

## QUESTIONS FOR ME

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- Prepare Exhibits
- Have the Court Reporter mark these notes for identification purposes...
- Is this your handwriting?
- Did you prepare this?
- Please read it into the record...
- What if he exercises a Fifth Amendment Challenge?

## DEPOSITION

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We are here today at the offices of the Assassination Records Review Board for the purpose of taking the deposition of Mr. Robert White.

My name is Kim Herd. I am an attorney for the Review Board. Also present are.....

Mr. White is appearing pursuant to a Subpoena Duces Tecum issued by the Department of Justice on behalf of the Review Board.

- If at anytime you wish to take a break during the deposition, please let me know. Also, if you do not understand a question, please don't hesitate to ask for clarification..
- At this time, I'll ask the Court Reporter formally administer the oath..

You understand that you're here pursuant to a subpoena?

You're testifying under oath

You are subject to all laws with respect to perjury?

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## Background Questions

- Just a couple of background questions....
- Did you receive a copy of the subpoena ?
- From Whom?
- When?
- Age
- Where do you currently reside?
- Where do you currently work?
- Brief description of your educational background?
- When start collecting?
- What sparked your interest?
- How did you start off collecting?
- What did you do with the items you collected?
- Where did you obtain these items?

## Evelyn Lincoln - Background

- At some point, did you try to make contact with Evelyn Lincoln?
- When?

- Why?
- Did you receive a reply from her?
- What was her reply?
- Did you try to contact her again?
- For what purpose?
- How often would you write to her?
- Did she ever write back?
- When did she write back, and what did she say?
- What did you do next?
- Continue to write to her?
- During the course of your conversation, did you ever mention any of the items you had, and ever ask her to authenticate them?
- How did you first bring this up?
- What was her response?
- List all the items you asked her to authenticate...
- Did you ever go to her home?
- While you were at her home, did she ever show you any JFK items?
- What did she show you?
- Did you ever ask her for any of these items?
- Did she ever give you anything?
- What did she give you?
- What did you do with these items?

- Did Evelyn or Harold Lincoln describe the origin of these records?
- Do you have any documentation to this effect?
- Ever any discussion or understanding about what you were to do with these items?
- Did you ever buy anything from Evelyn Lincoln during her life time?
- Go through each and every item you received from Evelyn Lincoln during her life time?
  - provenance of each

Dictabelts - Origin? Logs?

- Did Ms. Lincoln ever introduce you to anyone else that had in any way been associated with the Kennedys?
- Who were these people?
- Did any of these individuals give you any of the items which you ever placed in your collection?
- What were these items?
- 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.

- Origin of dictabelts - what did Ms. Lincoln say with respect to the origin of the dictabelts?

- Did you ever buy anything from Evelyn Lincoln during her lifetime?
- How much did you pay for it?

- Did you ever show any thing to Evelyn Lincoln (that you had received from someone else) and ask her to authenticate 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?

- RE: Assassination-Related Materials

- Ask question - Do you remember coming here and telling us that you didn't have Any assassination-related material. Now, you're telling us that you do?

### **Lincoln's Estates**

- First, I will talk about them jointly,

- When did you first see items that Evelyn Lincoln had left under her will?

- Did Harold Lincoln show you any of these items?

- - “Mr Lincoln showed White where the file cabinets were located in the Lincolns' apartment, but they were unable to open any of the combination locks that sealed the cabinets.

- Did Harold Lincoln give you any of these items? (Annapolis article - Harold gave him the Hermes briefcase and said - Evelyn would have wanted you to have this)

- Did you ever tell the Annapolis Quarterly that the items you received from Evelyn and Harold Lincoln represented 60 percent of your core collection?

- What did he show you?

- Did he ever write anything down for you?

- Where are these documents?
- When Harold Lincoln died, when did you first have access to the Lincoln's apartment?
- Did you tell Brian Rosen and Dave Montague that "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?
- What did Blakeslee have to say about this?
- How long did the inventory take?
- Were Blakeslee and McGuire present with you the entire time?
- Did you take notes?
- What did you do with these notes?
- "Forwarded the notes and blank stationary to Blakeslee, who created the final letter, inventory and appraisal
- White merely signed the papers at Blakeslee's request.
- Did you keep any copies of your notes?
- When you inventoried the trunks, how did you label them for purposes of your notes?
- Why do they appear differently here?
- WHITE PROVIDED US WITH A LIST AND DESCRIPTIONS OF HE ITEMS HE RECEIVED FROM THE LINCOLN ESTATE< all of which are "memorabilia" unrelated to the assassination.
- When did you take possession of your file cabinets and trunks?
- What were the size of the file cabinets and trunks?

- Describe the size of the others' file cabinets and trunks.
- Did you know Stephanie Kenyon? Did you assist her with her appraisal in any way?
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- Describe the diaries you observed in the file cabinets?
- Day journals with red covers packed together in a single, average sized box.
- Any appointment books separate from day journals?
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- What happened after you were done with the inventory?
- Ever go back to the Lincolns' apartment?
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- What was your relationship with Stephen Blakeslee?
- Had you met him prior to the Lincoln's death?
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- What if anything did you receive from Stephen Blakeslee after the deaths of Evelyn and Harold Lincoln?
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- What items did you receive from Stephen Blakeslee?
- Did you prepare an inventory? (Have inventory marked for identification)
- Who asked you to prepare this inventory?
- Was your preparation of the inventory preceded by any meetings or conversations?
- how many?
- how many times did you meet with Mr. Blakeslee to discuss the inventory
- Did you personally go through each of the file cabinets?

- Who was present when you did this?
- Did you make notes when you did this?

### GO THROUGH THE INVENTORY

#### Evelyn Lincoln Inventory

- What does this inventory represent?
- When did you prepare it?
- 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
- Is there anything you received from Evelyn Lincoln at any time - either before or after her death, that is not on here?
- How many items in total did you receive from Evelyn Lincoln - both during her lifetime and after her death?
- What?
- Where are these items now?

#### EACH INDIVIDUAL ITEM UNDER THE INVENTORY

- Dictabelts - in what condition did you receive them?
  - any transcripts of anything that was heard on these dictabelts?
  - Do you possess any logs or other records relevant to the dictabelts?
- Do you possess any documentation or records that accompanied the dictabelts?
- Do you possess any analog tapes of meetings that occurred in the White House or with JFK?

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

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### Court Proceedings Surrounding Lincoln Estates

- At what point did you feel it was necessary to file suit?

- Do you have information regarding Maria Wray's challenge to the authenticity of the documents?

- What were the terms of the agreement?

- Why did you believe Maria Wray took items to which you were entitled?

- What was your contact with the Wrays when they came to Maryland?

### 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?

- Go through each paragraph and ask about each item received..

- When did you receive this?
- What condition was it in?
- Who gave it to you?
- Any documentation accompanying the item?
- Has it been in your custody and control since then?
- Any other /

#### CATEGORIES OF THE ROBERT L. WHITE COLLECTION

Further delineate what you mean by -

- Feature Items
- Letters
- Assassination-related material
- Miscellaneous trivia

#### MEETING WITH BRIAN ROSEN AND DAV E MONTAGUE ON 4-10-97

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#### GENERAL QUESTIONS -

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

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

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

- Any records or documents that contain a 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?