

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

TO: The Sixth Floor Museum  
411 Elm Street, Suite 120  
Dallas, Texas 75202-3301

YOU ARE HEREBY REQUIRED AND DIRECTED, PURSUANT TO 44 U.S.C. § 2107 AND RULE 30(b)(6) FED. R. CIV. P., TO APPEAR BEFORE:

T. Jeremy Gunn, Executive Director and General Counsel of the Assassination Records Review Board, at the offices of the United States Attorney at 1100 Commerce Street, Suite 300, Dallas, Texas, 75242, on March 24, 1998 at 9:00 a.m., and at the same time each day thereafter, until the taking of testimony is complete, or at such other mutually agreeable time and place, to testify under oath regarding information or records in the possession, custody, or control of the Sixth Floor Museum and that relate to the assassination of President Kennedy, including the records identified in Attachment A hereto.

Pursuant to Rule 30(b)(6), Fed. R. Civ. P., the Museum is requested to designate an officer, director, managing agent, or other person to testify on the Museum's behalf regarding certain "matters known or reasonably available to" the Museum, including the following subjects:

- (1) Inventories, indices and other records that will identify and describe its holdings relating to the Kennedy assassination;
- (2) the acquisition and legal ownership of the Museum's holdings relating to the Kennedy assassination;
- (3) the maintenance and preservation of original paper records, as well as photographs, motion pictures, videos, and audio recordings;
- (4) the rules and practices with respect to public access to the Museum's holdings relating to the Kennedy assassination; and

(5) the identification of any original records of the Museum that were made available to the Warren Commission, the Church Committee, or the House Select Committee on Assassinations.

YOU ARE HEREBY REQUIRED to produce and to make available for inspection and copying or reproduction at said time and place books, records, correspondence, notes, diaries, electronic recordings, photographs, motion pictures, documents, or other objects that are in the possession, custody, or control of the Sixth Floor Museum, and which are described in Attachment A hereto.

The production of documentary material in response to this subpoena must be made by a designee of the Sixth Floor Museum under a sworn certificate. Accordingly, please review and execute the attached Certificate of Compliance to verify that the Sixth Floor Museum has complied with the subpoena.

Inquiries concerning compliance with this subpoena should be directed to: T. Jeremy Gunn, Executive Director and General Counsel, Assassination Records Review Board, 600 E Street, N.W., 2nd Floor, 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

### A. PRELIMINARY STATEMENT

The Review Board is issuing this subpoena to obtain the sworn testimony of the appropriately designated officer of the Sixth Floor Museum with respect to the identity and existence of records relating to President Kennedy's assassination that are held in the archival collection of the Sixth Floor Museum. The subpoena seeks to have the requested records made available for inspection by the Review Board so as to assist the Review Board in determining whether the originals or copies of any records should be obtained for the JFK Assassination Records Collection ("JFK Collection") at the National Archives and Records Administration in College Park, Maryland. The subpoena of the records specified herein does not necessarily mean that the Review Board will seek to have the original records (or copies thereof) placed in the JFK Collection.

### B. DEFINITIONS AND INSTRUCTIONS

1. The "Museum" or "you" refers to the Sixth Floor Museum in Dallas, Texas, including all officers, officials, employees, and agents of the Museum that may have possession, custody or control of the records identified in this subpoena.
2. "Records in the Museum's possession, custody, or control" refers to records (to the extent requested in the subpoena) that are in the physical custody of the Museum, or records to which the Museum has control or legal custody or access.
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 as requesting the largest number of records.
3. "Document" or "record" should be understood broadly, as reflected in Rule 34(a), Fed. R. Civ. P., to include, without limitation, records, diaries, calendars, handwritten notes, memoranda, drawings, photographs, audio recordings, motion pictures, and correspondence. It also includes any tangible objects or artifacts. *However, you are not required to bring with you any commercially published documents (including books, articles, videotapes, or audiotapes) that might otherwise be called for by this subpoena.*
4. To the extent that you do not comply with any particular request, you should comply with all remaining requests and be prepared to explain the basis for not complying with the particular request.

5. To the extent that you do not produce one or more records that are otherwise responsive to this subpoena, please identify (for each document that is not produced):

-2-

(a) the date of the document; (b) the author; (c) the general subject matter of the document; and (d) the reason why you are unable to make the document available.

C. PAPERS, DOCUMENTS, AND RECORDS REQUESTED

YOU ARE HEREBY REQUIRED to bring all documents or other records in your possession, custody or control, including memoranda, correspondence, notes, drawings, photographs, audio recordings, and films, that discuss, refer to, relate to, reflect, or consist of the following (subject to the limitations above):

1. All inventories, indices, and other records that identify records and tangible objects or artifacts in the Museum's possession, custody or control.
2. Any original and duplicate copies of medical or autopsy records of President John F. Kennedy, former Texas Governor John Connally, Lee Harvey Oswald, Jack Ruby, and J.D. Tippit that may be in the possession, custody, or control of the Museum. These records include copies of any written statements made by treating physicians and personnel at Parkland Hospital.
3. The 8mm Dorman home movie of the Kennedy Presidential motorcade in Dallas on the day of the assassination.
4. Any original records or tangible objects made available to the Warren Commission, the Church Committee, or the House Select Committee on Assassinations.
5. With respect to the items specified in Request Nos. 2 to 4, also produce: (a) all documents that relate to the acquisition of these records by the Museum, including any contracts or deeds of gift; (b) all documents that relate to legal title to these records; (c) all documents that relate to the availability of these records to the public, including any restrictions on public access; and (d) all detailed indices or descriptions of these records.

**CERTIFICATE OF COMPLIANCE**

I/We hereby certify that a diligent search for the records called for by the subpoena issued pursuant to 44 U.S.C. § 2107 has been made, and that all such records in the possession, custody, or control of the Sixth Floor Museum have been produced and made available at the time, place and manner specified. A list identifying all of the records produced is attached.

Any records otherwise responsive to this subpoena which have been withheld from production under a claim of privilege or for any other reason have 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 claimed; (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 addressee to each other.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

Sworn to before me this  
\_\_\_ day of \_\_\_\_\_, 1998

\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_