

1 Committee," I believe?

2 A He gave the accurate name.

3 Q I had called it the organization --

4 A You had it a little bit wrong, and he knew it, and he
5 straightened you out on it.

6 Q He said it's the Fair Play for Cuba, is that about
7 right, or something to that effect?

8 A Yes sir, that's right.

9 Q And this went on until say 12:30 or 1:00 o'clock in
10 the morning, on Saturday morning the 23rd?

11 A Yes sir, it was at least that late, 1:00 or 1:30.

12 MR. WADE: Pass the witness.

13 CROSS EXAMINATION

14 BY MR. BELLI:

15 Q Did he speak that very bitterly, in answer to Mr.

16 Wade, that Mr. Oswald was a member of the Fair Play for Cuba
17 Committe, I mean as though he were angry, an angry shout. From
18 the crowd?

19 A No sir. That was not my impression. It was more that
20 it was shouted because nearly everything was shouted.

21 Q You had to shout.

22 A You had to shout as loud in the assembly room as you
23 did up in the hall. It was more of an explanatory statement.

24 Q That is the subversive group, isn't it? At least, wo
25 are led to believe, the Fair Play for Cuba?

1 WILLIAM G. SERUR

2 a witness called by the Defendant, having first been duly
3 sworn, testified on his oath as follows:

4 DIRECT EXAMINATION

5 BY MR. TONAHILL:

6 Q Please state your name, your age, your occupation, and
7 place of residence to the Court and jury?

8 A My name is William G. Serur. I live at 1248 Stevens
9 Ridge Drive. I'm self employed. I'm a salesman for myself.
10 I sell out of my car, and I travel Dallas and Ft. Worth.

11 Q How do you spell your last name?

12 A S-E-R-U-R.

13 Q How old are you?

14 A Fifty-one.

15 Q You live here in Dallas?

16 A Yes, sir.

17 Q You're fifty-one?

18 A Yes, sir.

19 Q How long have you lived here?

20 A About twenty-seven or twenty-eight years.

21 Q And you are a salesman?

22 A Yes, sir.

23 Q What do you sell?

24 A Drug sundries and novelties.

25 Q Did you ever engage in the upholstery business?

4-83

1 A Yes, sir.

2 Q Do you know Jack Ruby, the defendant here?

3 A Yes, sir. I know him very well.

4 Q How long have you known Jack?

5 A I would say in the neighborhood of around eleven or
6 twelve years.

7 Q Have you had occasion to visit him in his place of
8 business, or elsewhere?

9 A Yes, sir.

10 Q Do you know Jack Ruby's personality and his mental
11 make-up, his behavior pattern and so forth?

12 A Well, sir, I met Jack about -- are you asking me what
13 did I think about him when I met him?

14 Q I said do you know his behavior pattern, his personal-
15 ity, his temperment and disposition?

16 A Yes, sir. I found him to be a very emotional man.

17 Q That's what I want to know. You say you found him to
18 be a very emotional man?

19 A Yes, sir.

20 Q Just what do you have in mind?

21 A Well, he -- in my opinion he wasn't like most of the
22 men that I've met, the people I've met. He was high strung
23 and he was -- well, he was just the type man that he would
24 never stay in one place long enough to really talk with him.
25 He was on the go all the time. And I tried to make him out

4-84

1 from the beginning, but it was awful hard for me to figure
2 him out.

3 Q You consider him then to be highly emotional, and a
4 very unstable person?

5 A I would say that's right.

6 Q Have you had occasion to witness quick and instantan-
7 eous outbursts of rage by Jack Ruby while you were present?

8 A Well, the -- I have noticed that at his Vegas Club, yes,
9 sir.

10 Q Did you ever have occasion to visit one of his competi-
11 tors and find that they were overflowing with business, and
12 then go to see Jack when his business wasn't so good, and tell
13 him about it?

14 A Yes, sir, I have.

15 Q Tell us about it. What happened? What was Jack's re-
16 action?

17 A Well, Jack always didn't like me coming up and telling
18 him about any of his competitors. He said, "I don't want to
19 hear anything about my competitors."

20 Q Just start at the beginning now, and tell us what you
21 saw and what you went over and told Jack about? What happened?

22 A This was the last Saturday in October, or I would say
23 it was the first Saturday in November. I cannot recollect
24 that -- which date it was. That night about ten o'clock, I
25 took my wife home, and I told her I was going downtown. I had

1-85

1 heard someone tell me that Abe's Colony Club had a terrific
 2 show, and I found great relaxation in going to shows, so I
 3 decided I'd go there. I got up there about ten-thirty that
 4 night, on a Saturday night, and when I got up to the top of
 5 the steps, the smoke was pouring out of there, and people
 6 were standing there waiting to go in, and there was no seating
 7 there available at that particular time, so I had to stand at
 8 the wall. And the M.C. was terrific and the girls they had
 9 was real good, and I was enjoying it even though I didn't have
 10 a seat. So, I guess I stayed there until about eleven-thirty.
 11 And the show was over, and I enjoyed it much, and I said, I
 12 guess I'll take a little run and go over and see Jack. When
 13 I got to where the Carousel Club entrance is, I walked up the
 14 stairs, and when I got to the top of the stairs, I looked to
 15 the right there and left, and I couldn't see anything except --
 16 his club was real dark, and I guess there was about five or six
 17 people in there. I looked over to my left, to the post that I
 18 always found Jack at, where he turns the lights on the stage.
 19 Jack had his hands to his back and pacing back and forth,
 20 looking at the floor. And I stood there for a minute, and I
 21 said, I'm really surprised at the kind of crowd that Jack has
 22 here. So I said, I guess I'll just walk over to where he is.
 23 I walked about ten steps and turned to my left, and Jack was
 24 still pacing back and forth. I walked up to Jack and he
 25 looked at me, and he didn't say a word for a second. And the

1-85

1 lights was shining right on Jack's face, the light was showing
 2 right on him, and I said, say Jack, I just got in -- came in
 3 from Abe's Colony Club and he had a tremendous crowd, one of
 4 the largest crowds that I have ever seen. I can't figure this
 5 out. Jack kind of tilted his head over to one side, I could
 6 see the intent in his eyes. What the intent was, I didn't
 7 know, but Jack started in on me and he said, what do you mean
 8 coming up here telling me about this competitor of mine. I'm
 9 not interested in my competitors. I feel bad enough as it is.
 10 Do you see the crowd I have? Don't you do this to me any
 11 more. I froze and was petrified. I couldn't even move for a
 12 second, and I didn't -- I just dared not say a word. I just
 13 didn't say another word.
 14 Q Mr. Serur, describe again what he did. He turned his
 15 head, twisted sideways?
 16 A Jack, when he gets mad, he doesn't walk to you straight
 17 and look at you. He kind of tilts a little bit, and he ex-
 18 plodes without warning, and that's the way he did me. And I
 19 just stood there.
 20 Q What kind of a look did he have in his eyes?
 21 A I kept looking at those eyes, and I got scared. And I
 22 knew I said too much. He kept raving like a mad man, and he
 23 said, "Don't you ever do this to me again. If you want to
 24 come to my club I don't want to hear this kind of stuff any
 25 more. I'm telling you now and you'd better be careful."

4-57

1 Q All right. Did he have a wild look in his eyes?
 2 A he looked wild enough to me, he had me scared.
 3 Q Why were you scared?
 4 A Because I wasn't used to Jack getting into that type of
 5 outburst.
 6 Q Well, did he get over it suddenly, or what?
 7 A I kept my back to him when he walked away, and I walked
 8 about two or three feet and I saw a little table and a chair,
 9 and I decided I'd better get right there, but first I decided
 10 I'd better leave. And I said, "No, Jack will get mad." So I
 11 looked towards the bar, the bar is over to the left, and he
 12 walked to the bar and the man gave him a glass of water, the
 13 bartender. And then Jack disappeared into the right corner.
 14 And I was sitting there and didn't know what to do, and I was
 15 pretty scared. I would say about seven or eight minutes later
 16 then I said, "This is it" and Jack started walking toward me
 17 and I said, "Now, what's he going to say", and he walked up to
 18 me. When he walked up to me he was a different person altogether
 19 and he walked right straight to me and he laid his shoulder on
 20 my hand, and said, "Kid, you want a cup of coffee?" He said,
 21 "Get me one too, black coffee, no sugar and no milk."
 22 Q You just said he laid his shoulder on your hand.
 23 A I mean laid his hand on my shoulder.
 24 Q What did he say about the coffee?
 25 A He said, "Why don't you get yourself a cup of coffee,

4-58

1 and fix me one, black, no cream and no sugar." I think that's
 2 what he wanted. He said, "You'll find the coffee behind that
 3 little wall, right behind that little wall."
 4 Q Was he calm?
 5 A He was just as cool and calm as I ever saw him.
 6 Q Did he apologize for what he'd just said to you?
 7 A I never found Jack to be an apologetic type person.
 8 Q Did he appear to you as though he realized he had just
 9 bawled you out in a fit of emotional rage?
 10 A He acted as if nothing had happened, or as if he had
 11 said nothing.
 12 Q How long did you stay there and talk?
 13 A He stood up drinking this coffee and said, "I don't
 14 want you to leave. I've got this girl, Jada, and I want you
 15 to see her and tell me what you think about her."
 16 Q Have you see Jack in these outbursts on numerous
 17 occasions?
 18 A Yes, I have.
 19 Q Does he cool off rather quickly, and not mention them
 20 as though nothing ever happened?
 21 A I will say this with true respect for Jack, that when
 22 he explodes and gets mad, he does it quicker than any person
 23 I ever seen, but he can cool off quicker than any person I
 24 ever saw.
 25 Q Have you always been astounded and terrified by those

4-20

1 instantaneous violent tempers of his?

2 A Yes, sir. I saw a lot of that at the Vegas Club on
3 Oak Lawn.

4 Q Did you ever see Jack with his dogs, or talk to him
5 about his dogs?

6 A Yes, sir.

7 Q What did he refer to the dogs as?

8 A He called them my children and my kids.

9 Q How did he feel about those dogs?

10 A Well, in order to tell you about that, I would have to
11 tell you about the telephone call I received from Jack.

12 Q Go right ahead.

13 A I received a telephone call from Jack one day, and he
14 said he wanted me to put seat covers on his automobile. I
15 said, "What's wrong with your seat covers, Jack?" And he
16 said, "Well, I'll let you look at them and then you can tell
17 me what I'll need." So I said, "Jack, I won't be able to see
18 you today, but tomorrow evening at three o'clock I'll drive
19 down there and see you." And he said, "Look Bill, I'll be
20 parked on the Field Street side, or my car might be in the
21 garage" but he said, "I'll meet you then." I said, "Fine,
22 I'll be there at three o'clock." So at three o'clock the next
23 morning -- I mean the next day, I drove to Field Street and
24 noticed an Oldsmobile parked, but I didn't look into it be-
25 cause I wanted to get around there quick to where Jack was.

4-20

1 When I made the corner to go where the Carousel Club was, I
2 looked to the left and Jack was stooping down opening up dog
3 food. There was a little ledge inside of the garage, the
4 parking station, and I would say there was three or four dogs --
5 and Jack used to always tell me, "I don't want you to refer to
6 them as dogs." He said, "Those are my children." He said,
7 "Don't you have children?" He said, "Don't you respect them?"
8 He said, "I respect my kids." He said, "They go wherever I go
9 and I want you to not call them dogs any more." So he had
10 names for them, but I couldn't recall what the names was. So
11 as he was opening up the dog food, his left hand was bleeding
12 profusely. It wasn't scratches, it was deep gashes.

13 Q He cut it on the can?

14 A As he was opening up -- he had that type that you go up
15 and down, but he was cutting his hand. And I said, "Jack, how
16 come your hand's all cut up?" And he said, "It'll be all
17 right." And about that time, blood was all over his hand, and
18 the largest of the dogs was licking the blood off of his hand.
19 I said, "Jack, I wouldn't let those dogs lick that blood. I'd
20 be afraid of them." And he said, "I told you not to call these
21 children of mine dogs any more." And he stood up and looked
22 at me right straight in the face, and I didn't say no more.
23 And I said, "That's all right, Jack. I'm sorry." He said,
24 "These are my children, and I respect them just like you re-
25 spect your kids." He said, "You tell me you've got three kids."

-31

1 Q Did he have that twist in his neck and head, and that
2 look in his eye?

3 A Well, I didn't notice too much the twist that particula-
4 rly, but he said, "Would you help me get these dogs upstairs?"
5 He said, "Then we'll go look at the car." And we got up-
6 stairs, and he's got a big white towel that you dry dishes
7 with, and he wrapped it around his left hand.

8 Q Did you help him get his children upstairs?

9 A I helped him get the dogs upstairs, and when he opened
10 the door I had to turn because I couldn't stand the odor com-
11 ing from the room where he kept his dogs.

12 Q Well, did you ever do anything for him about the up-
13 holstery on his car?

14 A Yes, sir. We went back down to his car. He opened the
15 door, and when he did, I burst out laughing. And he looked at
16 me, and he said, "What are you laughing about?" He kind of
17 tilted his head that time. I said, "I want to know what did
18 this. I've never seen seat covers like this."

19 Q Did what?

20 A Did this to his seat covers. They were all eat out.
21 All the upholstery was all over the back floor board, and all
22 over the front floor board. The only thing left of the seat
23 covers was the outer shred of the seat covers. They were
24 nylon material that Oldsmobile usually puts, but they ate out
25 the pockets. I called it pockets. The only thing they left

4-02

1 was the outer edges. If I could describe it to you. They
2 left the outer edges, but they ate out the whole thing and you
3 could see the springs protruding. I said, "Jack, what did
4 this?" He said, "My children." He said, "Anything wrong with
5 that?" He kind of tilted his head, and I said, "I can't
6 figure this out. You mean the dogs?" And he said, "What did
7 I tell you about my dogs?" He said, "My children did it."
8 He said, "What do you want to do, cause an argument out here?"
9 He said, "I asked you to come down here and give me a price on
10 these seat covers, and now you want to criticize my children."
11 I said, "Wait just a minute, Jack. Will you give me a little
12 time to see what you're going to need here?" I said, "What
13 type of seat covers do you want?" He said, "I want something
14 that my children can't eat up too quick." I said, "Well, the
15 only thing I would suggest would be naugahyde." And he wanted
16 to know if that was the same material that they use on cafe
17 booths, and I said, "Jack, that is the only thing that you
18 could put to keep them from getting to it too quick." I said,
19 "I don't guarantee you that they won't chew it all up." He
20 said, "That's all right. What are you going to charge me?"
21 And I said, "Now, Jack let me tell you something. If you went
22 to any seat cover place in Dallas, Texas, they would charge
23 you anywhere from a hundred to two hundred dollars to fix this
24 car." And when I said that, he tilted his head and said, "I
25 didn't ask you to give me any reference to other seat cover

4-93

1 companies. I called you because you are my friend." And he
2 said, "I don't appreciate you telling me anything about anybody
3 else. I called you because I wanted you to fix this car for
4 me. I wanted to help you out."

5 Q Did you consider it unusual that he referred to those
6 dogs of his as his children?

7 A Yes, I couldn't figure that out.

8 Q But he was insistent that you call them his children,
9 wasn't he?

10 A He demanded I call them.

11 Q Well, did you ever have any trouble with him about the
12 -- some furniture, or something in the living room of his
13 apartment, that his dogs chewed up that you went to fix there?

14 A No, sir, I didn't have any trouble --

15 Q About some wall paper, or something?

16 A He asked me to come to his apartment, which was off of
17 Fitzhugh. This apartment was behind the Holiday Central, or
18 whatever you call that big, nice apartment motel that's up
19 there on Central Expressway. And I visited him one Sunday
20 morning, and when I went into his apartment that Sunday morn-
21 ing, the first thing I noticed, the baseboard was all eat out,
22 and the couch was all eat up, part of it. And I said, "Jack,
23 what in the world happened?" And he said, "My children." He
24 said, "Anything wrong in that?" He said, "My children eat it
25 up." He said, --

4-94

1 Q In other words, whenever you acted as though his
2 children had been bad children, he didn't like that? He would
3 get mad and get in an uproar?

4 A Well, he just wanted to take up for his kids, I guess.
5 I don't know. That's what --

6 Q Have you seen him have any of these episodes or violent
7 outbursts over trivial things?

8 A Yes, sir, I have.

9 Q On many occasions?

10 A Yes, sir.

11 Q You consider him then to be a highly emotional and un-
12 stable person, don't you?

13 A I would say that from the time that I first met Jack,
14 I didn't think that, but right here in the last few years I
15 thought that he might have been suffering from some form of
16 disturbance, mental disturbance, by the way he acted.

17 Q There's no doubt in your mind about that now, is there?

18 A Sir?

19 Q There's no doubt in your mind about that now, but that
20 Jack has a mental disturbance?

21 A I would almost say that I was sure of it.

22 Q You're positive now, aren't you?

23 A I'm positive that it can hit him most any time. That's
24 the way I've got it figured.

25 Q Have you ever seen him cry?

4-55

1 A Never have.

2 Q Emotionally?

3 A No, sir.

4 Q Where do you live now?

5 A 1248 Stevens Ridge Drive.

6 MR. TONAHILL: That's all.

7 CROSS EXAMINATION

8 BY MR. WADE:

9 Q You never have seen him cry?

10 A I never have.

11 Q How long have you known him?

12 A About twelve years.

13 Q You've known him twelve years? How often have you seen

14 him during that time?

15 A Well, the first time I recollect meeting Jack Ruby was

16 at the Silver Spur.

17 Q Out on South Ervay. When he got mad he scared you to

18 death, didn't he?

19 A Well, I just don't like to be around people that

20 hollers at me.

21 Q You kept on going back to see him though, didn't you?

22 A Well, I --

23 Q For twelve long years?

24 A Well, now --

25 Q You didn't have to go out there, did you?

4-55

1 MR. BELLI: Wait a minute. I suggest if you want

2 an answer, let him answer first.

3 Q (By Mr. Wade) Did anybody make you go out there?

4 A Jack didn't --

5 MR. BELLI: Now we've got three questions.

6 A Jack didn't get into any outbursts when I first met him.

7 MR. TONAHILL: Your Honor, it's argumentative

8 anyhow.

9 Q (By Mr. Wade) Have you ever seen him throw anybody

10 out of his club up there?

11 A I've seen him walk them out of his club, yes, sir.

12 Q What for?

13 A Well, I can tell you of a lot of instances that -- he

14 know them all. The minute they entered his club, he said, "I

15 don't want you in here, and I told you don't come out here any

16 more."

17 Q How about carrying a pistol? Did he throw them out of

18 there for carrying a pistol, or did everybody in the club carry

19 a pistol?

20 MR. TONAHILL: We object to it and ask him to

21 break it down. That's three questions.

22 THE COURT: All right. Break it down.

23 Q (By Mr. Wade) Did everybody up there carry a pistol?

24 A No, sir.

25 Q Did you carry one?

4-97

1 A No, sir.

2 Q Do you carry one all around town while you're traveling?

3 MR. TOMAHILL: That's not material.

4 MR. WADE: I think it's important.

5 THE COURT: Sustain the objection.

6 A No, sir.

7 Q (By Mr. Wade) You're a traveling salesman, aren't you?

8 A That's right, but I don't fool with pistols.

9 Q You don't fool with them?

10 A No, sir.

11 Q I thought everybody in Dallas carried them?

12 A I've never owned one in my life.

13 MR. TOMAHILL: Your Honor, we'll stipulate if the

14 District Attorney thinks everybody in Dallas carries a

15 pistol.

16 MR. WADE: That's according to the defense

17 lawyers. They said everybody carried a pistol, Your

18 Honor.

19 MR. TOMAHILL: Mr. Wade said, "I thought every-

20 body in Dallas carried a pistol" and if he want's to

21 say that and think it --

22 MR. WADE: That's all you've been --

23 A Mr. Wade, you don't insinuate I carried a pistol?

24 Q (By Mr. Wade) Do you carry a pistol?

25 A No, sir. Never.

COMMISSION EXHIBIT No. 2411--Continued

4-98

1 THE COURT: Talk one at a time, gentlemen.

2 Q (By Mr. Wade) Did you --

3 MR. BELLI: Judge, we can't get a record, in

4 fairness to the reporter here --

5 Q (By Mr. Wade) In all of this time, you say he took the

6 dogs with him nearly everywhere he went, didn't you? In his

7 car, didn't he?

8 A He told me he carried them wherever he went.

9 Q No matter where he went, he had the dogs with him?

10 A That's right.

11 Q Did he have them up in the club?

12 A Yes, sir.

13 Q Where were they up there during the strip acts?

14 A He had them in a room to the left of the kitchen.

15 Q I imagine after this incident that you told about when

16 you were so scared you didn't know what to do, that you re-

17 ported that to the police, didn't you?

18 A No, sir.

19 Q Did you report any instance you ever saw with the de-

20 fendant, to the police?

21 A No, sir.

22 Q Never reported anything?

23 A No, sir. Had no occasion to.

24 Q Well, you were scared, you said almost to death when he

25 was threatening you.

COMMISSION EXHIBIT No. 2411--Continued

4-30

1 A I get scared every day of some people, but I can get
2 over it pretty quick myself.

3 Q Did you keep going back to him the next day?

4 A I don't -- sometimes when I get in a little wrangle
5 with Jack, I may stay away from his place two or three weeks,
6 but I always go back.

7 Q Always go back, because you like him?

8 A I like him very much.

9 Q You like that atmosphere up there, don't you?

10 A Well, yes, sir, I found great relaxation there.

11 Q Great relaxation --

12 MR. BELLI: Judge, we just can't get a record --

13 MR. WADE: She's not complaining.

14 MR. BELLI: Well I am. And I want a record, and
15 I want a good record here, with every word.

16 MR. TONAHILL: That's something the District
17 Attorney doesn't want, is a record.

18 MR. BELLI: That's exactly it. The District
19 Attorney doesn't want a record here, Your Honor, but
20 we do.

21 MR. WADE: Judge, we object to all that, and ask
22 the jury not to consider what he's saying there about
23 our not wanting a record.

24 MR. TONAHILL: Ask the jury not to consider Mr.
25 Wade's questions too, Judge.

4-100

1 Q (By Mr. Wade) I guess when he came over there and you
2 were complaining about his business being not as good as next
3 door, that did make him mad, because he liked to make money,
4 didn't he?

5 A I think he did, yes, sir.

6 Q He liked to be in the lime light, didn't he? He liked
7 to be known by people?

8 A Jack was well known, in my opinion.

9 Q He liked -- he was always looking for a plug here and
10 there, wherever he could get it?

11 A I don't know about the plugs, but I knew that he knew
12 a lot of people.

13 Q Did he like to have good looking girls with him?

14 A I don't know. I never have seen Jack on any of his
15 dates, or anything after leaving the club, no, sir.

16 Q I'm talking about, you've never seen him in a public
17 place with any girl?

18 A Not that I know of, no, sir.

19 Q In twelve years?

20 A No.

21 Q Never have seen him with any girl in twelve years?

22 A No, sir.

23 Q You've seen him once or twice a week, I guess, haven't
24 you?

25 MR. BELLI: Judge, I hardly know what grade of

4-101

1 character that would prove or disprove, someone who
2 didn't want to be seen complacent with a good looking
3 girl, and I say that with my wife in the audience.

4 MR. ALEXANDER: Now, Your Honor, this witness
5 doesn't need any coaching from Mr. Belli. We object
6 to his comments.

7 Q (By Mr. Wade) And you never have seen him cry in all
8 your life?

9 A Never.

10 Q I assume after that last time when he got so mad with
11 you, and threatened you, that you were afraid to even leave,
12 is that right?

13 A For a little minute, yes, sir, I thought I better not
14 leave because Jack might get mad at me.

15 Q You didn't want to make him mad at you?

16 A No, sir.

17 Q You wanted to keep his friendship?

18 A Yes, I learned the way to get around Jack, and I under-
19 stood Jack better than a lot of people.

20 Q You understood him a lot better, so understanding his
21 problem I assume you took him to a psychiatrist, or a doctor,
22 to treat him, didn't you?

23 A No, sir, I didn't.

24 Q Didn't you ever take him to a doctor with all that out-
25 burst that he was giving you?

COMMISSION EXHIBIT No. 2411--Continued

4-102

1 A No, sir.

2 Q You didn't? And you kept going back to see him, and
3 see his show there?

4 A Yes, sir. Every time he had a good headliner there,
5 I made up my mind to go there. I was a free paid patron. I
6 never paid a dime to go in Jack Ruby's place.

7 Q You never paid a dime?

8 A No, sir.

9 Q Who was your favorite stripper there?

10 MR. BELLI: That's objected to. It's incompetent,
11 irrelevant and immaterial.

12 THE COURT: Sustain the objection to it.

13 A I didn't show no favoritism to any stripper.

14 Q You never --

15 MR. BELLI: Don't get in an insulting match with
16 the District Attorney, because he can out insult anyone
17 in the room.

18 THE COURT: Let's keep the sidebar remarks out.
19 The Court's going to sustain the objection to the last
20 question. Go ahead.

21 Q (By Mr. Wade) You kept on coming back? You were in
22 there the night before -- a day or two before the assassina-
23 tion, weren't you?

24 A No, sir, I wasn't.

25 Q You weren't?

COMMISSION EXHIBIT No. 2411--Continued

4-103

1 A No, sir.

2 Q Were you off on the road?

3 A No, sir. I was in town, but I -- after Jack -- a few
4 little things go on sometimes, I just don't go up there to see
5 him. I just stay away sometimes, but he always wants to know
6 why I haven't been around.

7 Q Why you haven't been around. But you liked him quite
8 a bit, and was a good friend of his?

9 A Yes, sir.

10 Q You'd do nearly anything to help him, wouldn't you?

11 A Well, he -- I thought I was helping him a lot of times,
12 but he helped me a great deal.

13 Q He's helped you a lot and you'd be glad to help him,
14 you'd do anything you could for him?

15 MR. TONAHILL: Let him be specific, Your Honor.

16 A Well, I don't know what you mean, Mr. Wade by --

17 Q (By Mr. Wade) You'd testify for him, wouldn't you?

18 A Well, I would just say that Jack was fine up until
19 about -- until he took over the Carousel Club, and then he
20 begun to do so many crazy things, that I started forming my
21 opinion that Jack was becoming to be a sick man of some type.

22 Q Did you ever carry him to a doctor of any kind?

23 A No, sir. He didn't ask me to.

24 Q He didn't ask you to?

25 A He didn't tell me that he was ailing with any troubles.

COMMISSION EXHIBIT No. 2411--Continued

4-104

1 Q You were his friend, weren't you?

2 A Yes, sir, but he didn't disclose his personal feelings
3 or his health to me.

4 Q He was running a business there that took in hundreds
5 of dollars every night, didn't it?

6 MR. TONAHILL: What's that got to do with this
7 law suit? It's irrelevant and immaterial.

8 MR. WADE: It has a lot to do with it.

9 THE COURT: Sustain the objection.

10 Q (By Mr. Wade) He was running a business and handling
11 money, and making money out of it, wasn't he?

12 MR. TONAHILL: Same objection heretofore imposed.

13 MR. WADE: Judge, that's important on the mental
14 state, whether a man could run a business out here for
15 twelve years. That's the first time he knew him.

16 Q (By Mr. Wade) He's been in business for twelve years,
17 since you've known him, hasn't he?

18 A Yes, sir.

19 Q Where all has he been in business, what clubs that you
20 can recall that you've been in?

21 A Well, the first club that I recall meeting Jack, it was
22 so far back there, was the Silver Spur.

23 Q Where was that located?

24 A On South Ervay Street.

25 Q What type of place was that?

COMMISSION EXHIBIT No. 2411--Continued

4-103

1 A Well, after going down there a few times I decided that
2 that wasn't the part of town that I wanted to be, so I didn't
3 go down there too much.

4 Q All right. Where is the next club you saw him running?
5 A Then came the Studio Lounge. This was out on Oak Lawn,
6 and Jack Ruby took that over and called it the Vegas Club.
7 I would say that's about nine or ten years ago.

8 Q Nine or ten years ago. You went out there often,
9 didn't you?
10 A Sir, I was out there practically every other night, or
11 every night.

12 Q Every night. Are you a married man?
13 A Yes, sir.

14 MR. BELLI: That's insulting, if Your Honor please.
15 "Is he a married man." And I say this man is a master
16 at insult as any District Attorney I've ever heard, and
17 I've tried them all in this country and abroad. I
18 think he can insult with the best of them. Now, to
19 ask him if he's a married man, what has that got to do
20 with the --

21 MR. WADE: I think it's important.

22 MR. BELLI: He can outshout me too, but what has
23 that got to do with this man on trial for murder, ask-
24 ing him if he's a married man. I submit, Your Honor,
25 that that's incompetent, irrelevant and immaterial.

COMMISSION EXHIBIT No. 2411--Continued

4-103

1 Dirty, salacious, meretricious and insulting.
2 MR. BOWIE: Your Honor, he's already testified
3 that he's a married man.
4 MR. BELLI: Then why does he ask him repeatedly
5 again? To put in a little more prejudice in the case
6 that he's got so full of prejudice here, Judge?
7 MR. WADE: Judge, he's just making a speech, he's
8 not making an objection.
9 MR. BELLI: That's right, whenever it's
10 necessary --
11 THE COURT: All right. Sit down, Mr. Belli. Go
12 ahead, Mr. Wade.
13 MR. TONAHILL: Did I understand you to sustain
14 the objection?
15 THE COURT: I did.
16 MR. TONAHILL: Exception.

17 Q (By Mr. Wade) Now, you were there -- what was the last
18 question -- you were there every night at the Vegas Club?
19 A I wouldn't say every night, Mr. Wade, but I was there
20 practically every night.

21 Q Practically every night?
22 A Towards the weekend, every night.
23 Q On the weekend nearly every night?
24 A Friday, Saturday and --
25 Q Well, when did you move from there to the Carousel Club?

COMMISSION EXHIBIT No. 2411--Continued

1 A Well, Eva Grant took over the Vegas Club, and about
2 the summer of '60, I think, Jack took over the Carousel Club
3 which was called the Sovereign Club. He took it over from Joe
4 Slayton. That was the man that I was dealing with up there at
5 that particular time.

6 Q Joe Slayton?

7 A That's right.

8 Q And he operated the Vegas Club for how long?

9 A Jack Ruby?

10 Q Yes.

11 A I would say that he took the club over out there which
12 used to be called the Studio Lounge, I would say that was in
13 the early fifties, probably '51, '52, '53, somewhere in there.
14 I can't recall the exact date. About nine or ten years, I'd
15 say.

16 Q And how long has he been running the Carousel Club?

17 A I would say that he's been at the Carousel Club a little
18 over three years, there about, somewhere. I don't know exactly
19 the exact time.

20 Q Have you ever seen him throw anybody out of there for
21 carrying a gun?

22 A Not at the Carousel, no, sir.

23 Q How about the Vegas?

24 A Yes, sir.

25 Q What would he do? Would he throw them out and keep the

1 gun?

2 A No, sir. One night I was at the Vegas Club, and some
3 man came running up to Jack, and he says, "That man standing
4 back there at that booth has a pistol on him." And Jack left
5 us so quick that I couldn't even tell what happened to Jack,
6 and here come Jack marching him out of the club. Jack had his
7 hands back of his belt, and had the gun in his other hand, and
8 he didn't have it pointed at the man, he was just kind of hold-
9 ing it. He took it off the man. And he said, "You leave my
10 club and don't you ever come back in here any more." And Jack
11 Ruby called the police and they came. I was still there when
12 they came.

13 Q Did they come and get him for carrying a gun?

14 A Came and got who?

15 Q The other man I guess.

16 A No, sir. The other man got away.

17 Q He got away?

18 A Jack Ruby shoved him out the front door.

19 Q Why did he need the police? Did he tell the police to
20 go after him?

21 A The police did go after him.

22 Q Did they get him?

23 A They followed the car that he got into. Jack knew it
24 was an old model car and I did too, because I ran out there to
25 see the car when he sped away down Lemon Avenue.

4-109

1 Q What happened to the gun?

2 A Jack had it right there at the club when the police
3 came.

4 Q He kept the gun?

5 A I don't know what happened to the gun. I never did see
6 it any more.

7 Q You never have, in all your friendship and close rela-
8 tionship with him, you never have taken him to a doctor at
9 any time to be treated?

10 MR. BELLI: That's been asked many times.

11 THE COURT: Sustain the objection.

12 Q (By Mr. Wade) You haven't even suggested it, have you?
13 Not in all your life?

14 MR. BELLI: Did you sustain the objection, Your
15 Honor.

16 THE COURT: Yes, sir.

17 MR. BELLI: I thought so too.

18 Q (By Mr. Wade) And you're not trying to tell this jury
19 that Jack Ruby didn't know what he was doing when he was run-
20 ning those clubs?

21 A Jack Ruby knew what he was doing when everything was
22 going swell, but Jack was easy -- he was always upset with the
23 cold drink man and the people who brought him -- he was fuss-
24 ing with them all the time.

25 Q He was fussing with them and he was high tempered too,

4-110

1 wasn't he?

2 A Definitely high tempered, high strung, emotionally up-
3 set a lot of times, I found him to be that way.

4 Q When he was high tempered he was also mean, wasn't he?

5 A I wouldn't say he was mean, no, sir.

6 Q Well, you were afraid of him, weren't you?

7 A No, sir, it just frightens me sometimes when a man
8 hollers at me.

9 Q It frightens you?

10 A It kind of gets me --

11 Q That was a good --

12 MR. BELLI: Let him answer.

13 A Say that again?

14 Q (By Mr. Wade) Your counsel -- I think you answered the
15 question.

16 MR. BELLI: That's a typical modus operandi that
17 we see of the District Attorney on television, but I
18 think Your Honor runs a more dignified court.

19 THE COURT: Make your objection to it, Mr. Belli.

20 MR. BELLI: Object to him cutting off the witness
21 before he has a chance to answer.

22 Q (By Mr. Wade) Go ahead and answer the question.

23 A What was that question, sir.

24 Q I don't know. We can let the reporter read it back,
25 but he said you were still talking and I thought you were

4-111

1 through with it.

2 MR. BELLI: He was asking what the question was,
3 Mr. Wade. Can't you remember?

4 MR. ALEXANDER: May it please the Court, counsel
5 over here on the left is not cross examining Mr. Wade,
6 and we object.

7 MR. BELLI: I'd love to though.

8 THE COURT: One more statement like that, counsel,
9 and I'm going to hold you in contempt. I'm not going
10 to put up with this. We've had enough of it. About
11 fifteen minutes of it is all I can take. I'm not going
12 to take any more of it.

13 MR. BELLI: I apologize to the Court.

14 Q (By Mr. Wade) Do you know why he wanted you to look at
15 Jada?

16 MR. TONAHILL: Now what's that got to do with it?

17 MR. WADE: He testified that he did, and I was
18 wondering if he helped him select his girls.

19 MR. BELLI: I think that was in answer to the
20 District Attorney's question that I was going to object
21 to at the time as incompetent, irrelevant and immaterial,
22 and I object now.

23 THE COURT: Sustain the objection.

24 Q (By Mr. Wade) Did you go with him to New Orleans at
25 one time to look at some strippers?

4-112

1 A No, sir.

2 MR. BELLI: That's objected to, and cited as
3 misconduct. It's only meant to confuse irrelevancies.

4 Q (By Mr. Wade) Have you been down there with him?

5 MR. BELLI: May we have a ruling?

6 THE COURT: Overrule your objection.

7 MR. BELLI: It's also incompetent, irrelevant and
8 immaterial and ask that it go out.

9 THE COURT: Overrule your objection.

10 MR. TONAHILL: Exception.

11 Q (By Mr. Wade) Did you go to Cuba with him, back in '59?

12 A No, sir. I didn't even know he went to Cuba until I
13 read it in the paper.

14 Q You didn't know it until you read it in the paper?

15 A That's right.

16 Q At that time he was gone two or three weeks. Didn't
17 you miss him?

18 MR. TONAHILL: There's no evidence here to sup-
19 port that, Judge.

20 THE COURT: Sustain the objection to it.

21 MR. WADE: All right. We pass him back.

22 REDIRECT EXAMINATION

23 BY MR. TONAHILL:

24 Q Now, with reference to Jack being mean, was Jack a kind,
25 charitable individual?

1 A If Jack liked you there wasn't anything in the world he
2 wouldn't do for you, but if he didn't like you he'd try to
3 avoid you.

4 Q You knew when Officer Mullinax died he took up a collec-
5 tion for his widow and gave a hundred and fifty dollars --

6 MR. WADE: We object to that.

7 THE COURT: Sustain the objection.

8 A I had heard something about --

9 THE COURT: Don't answer the question. Sustain the
10 objection.

11 Q (By Mr. Tonahill) What had you heard about Officer
12 Mullinax --

13 MR. BOWIE: We object, Your Honor. That's a
14 leading question.

15 THE COURT: The Court sustained the objection to
16 it. Go on to something else.

17 Q (By Mr. Tonahill) Now, you know Officer Blankenship?

18 A No, sir.

19 Q Did you ever hear of the time that Jack Ruby --

20 MR. BOWIE: To which we object. It's a leading
21 question.

22 THE COURT: Get on to something else, counsel.

23 MR. WADE: We ask you to instruct counsel not to
24 ask either of these questions of this or any other
25 witness.

1 THE COURT: Sustain the objection.

2 MR. WADE: So instruct him.

3 THE COURT: Not this witness or any other witness.

4 Q (By Mr. Tonahill) Mr. Serur, you say Jack was a kind
5 and generous individual, and not mean?

6 MR. WADE: Judge, that's leading. Just telling
7 the witness what to say.

8 A I would say that he was very unusually --

9 THE COURT: Don't be so anxious to answer the
10 question. Sustain the objection.

11 MR. TONAHILL: That's all.

12 MR. WADE: That's all.