

03_DOCUMENT_REGISTER

DOCUMENT REGISTER — John P. Frawley dossier

Every artifact located in this investigation, with type, date, source archive, stable locator, any Bates/exhibit number, seal status, and whether full text was obtained.

Rule observed: every entry has a real, resolvable locator; no IDs are invented. "Located" = a resolvable locator exists. "Full text obtained" = the document body (not just metadata/snippet) was actually read by a research agent.

Grading key: **[P]** primary obtained/read · **[P-cite]** primary, locator confirmed but body not read · **[2]** secondary · **[abs]** searched, not found.

A. Frawley's own primary publications (full text or pinpoint-confirmed)

#	Title / cite	Date	Archive	Locator	Full text?
A 1	"Scientific Evidence and Common Sense as a Basis for Food-Packaging Regulations," <i>Food Cosmet. Toxicol.</i> 5(3):293–308	1967 (delivered BIBRA London 25 Jan 1967)	Local PDF; PubMed; Semantic Scholar	PMID 4861454; CorpusID 33759952; papers/Frawley - 1967...pdf	[P] yes
A 2	"Investigations Establishing the Safety of Rosin Products for Food and Food-Packaging Applications," <i>Proc. Naval Stores Work Conference</i> (Gainesville FL, 19–20 Oct 1964), USDA ARS, pp. 65–70	1965	Local PDF; Internet Archive scan	IA proceedingso fnav7250nava ; papers/Frawley - 1965...pdf	[P] yes
A 3	"The 1980s — A decade of change," <i>Regul. Toxicol. Pharmacol.</i> 1(1):3–7 (inaugural-issue article; his ideological manifesto — attacks "zero risk"/Delaney & GLPs)	Jun 1981 (delivered Williamsbu rg, Jun 1980)	Local PDF + PubMed	PMID 7186152; papers/Frawley - 1981... pdf	[P] yes
A 3 b	Fitzhugh, Nelson & Frawley, "A Comparison of the Chronic Toxicities of Synthetic Sweetening Agents," <i>J. Am. Pharm. Assoc.</i> 40(11):583–586 (FDA; judged saccharin & cyclamate relatively nontoxic)	Nov 1951	Local PDF + PubMed	PMID 14907466; DOI 10.1002/jps.30304 01117; papers/Fitzhugh...1951...pdf	[P] yes

#	Title / cite	Date	Archive	Locator	Full text?
A 4	"Our sacred food — a perspective," <i>Regul. Toxicol. Pharmacol.</i> 9(3):209–211 (reprise of his 1965 FCT title)	1989	PubMed; CrossRef	PMID 2667039; DOI 10.1016/0273-2300(89)90057-3	[P-cite]

(Full publication list with ~27 confirmed items is in **02_Frawley_bibliography**; only the dossier-critical four are registered here.)

B. The central litigation record

#	Title / cite	Date	Archive	Locator	Full text?
B 1	<i>In re "Agent Orange" Prod. Liab. Litig.</i> , 565 F. Supp. 1263 (E.D.N.Y. 1983) (Pratt, J., sitting by designation; MDL 381). The government-contractor-defense opinion; six verbatim Frawley sentences extracted.	order 20 May 1983; rearg. denied 22 Jun 1983	cetient.com mirror; CourtListener cluster 2312256; r.jina.ai proxy of Justia (Justia direct = HTTP 403)	565 F. Supp. 1263; cetient ... 1458052	[P] yes (via mirrors)
B 2	Hercules, Inc. v. United States, 516 U.S. 417 (1996) (Rehnquist, C.J.; 4 Mar 1996). <i>180Msettlement; Herculesshare</i> * <i>18,772,568**</i> ; Tucker Act recovery denied. Frawley not named.	1996	Cornell LII; FindLaw; Justia	516 U.S. 417; No. 94-818	[P] yes
B 3	<i>In re Agent Orange</i> , Pretrial Order No. 43, 96 F.R.D. 582 (E.D.N.Y. 1983) — Special Master Sol Schreiber's blanket protective order (oral May 1982; written 14 Oct 1982) sealing all party documents and depositions. This is the instrument sealing Frawley's deposition/affidavit.	1982–83	Justia/CourtListener index (full text not retrieved — Justia 403, CL JS-empty)	96 F.R.D. 582	[2] (described, not read verbatim)
B 4	<i>United States v. Vertac Chemical Corp.</i> , 671 F. Supp. 595 (E.D. Ark. 1987) — CERCLA cost-recovery; cites " Frawley deposition p. 45 " as PX 213 for Hercules' ~\$60,000/mo leachate costs (surname only; almost certainly J.P. Frawley). Vacated 855 F.2d 856 (8th Cir. 1988).	1987	CourtListener (read via reader proxy)	671 F. Supp. 595; CL 2344231	[P] yes
B 5	<i>O'Dell v. Hercules, Inc.</i> , 904 F.2d 1194 (8th Cir. 1990) — Jacksonville dioxin trial, jury verdict for Hercules affirmed. Frawley NOT named (experts: Cranmer, Harbison, Stapleton; Judge Rubin).	1990	Justia (read via reader proxy)	904 F.2d 1194	[P] yes (Frawley absent)
B 6	<i>United States v. Vertac</i> opinions at 966 F. Supp. 1491 (1997), 79 F. Supp. 2d 1034 (1999), 33 F. Supp. 2d 769 (1998) — Frawley absent from all three.	1997–99	Justia (reader proxy)	as cited	[abs] (searched; no Frawley)

#	Title / cite	Date	Archive	Locator	Full text?
B7	<i>Reutershan v. Dow, Hercules, Northwest Industries & U.S.</i> — early Agent Orange tort complaint naming Hercules as defendant (S.D.N.Y.), pre-MDL.	n.d. (c. 1978)	USDA NAL, Alvin L. Young Collection on Agent Orange	NAL item 6529 , Box 197 Folder 5551	[P-cite]
B8	<i>U.S. v. Vertac Chemical Corp. and Hercules, Inc.</i> (E.D. Ark., Judge Henry Woods), 7 pp. — Jacksonville Superfund enforcement.	18 Jul 1984	Poison Papers via UCSF IDL	UCSF id tlb10360	[P-cite]

SEALED / OFFLINE — the prize the register cannot yet hold: Frawley's full Agent Orange MDL **deposition transcript** and **answering affidavit** (the originals behind B1's six quoted sentences) are governed by **PTO 43 / 96 F.R.D. 582** and were not digitized. Likely physical location: **National Archives at New York City, RG 21, U.S. District Court E.D.N.Y., MDL 381**. See **05_OPEN_QUESTIONS** for the drafted NARA request.

C. The two "key letters" (Strand III crux)

#	Title / cite	Date	Status	Locator
D O C A	Letter, Frawley → V.K. Rowe (Dow) re USDA Dr. John Leary's request to test phenoxy herbicides; hazards said to relate to 2,4-D not 2,4,5-T	3 J ul 1 9 6 3	[P-cite] — concrete exhibit locator FOUND (2026-06-09) . Indexed as exhibit H281 14-1 5 , "john p. frawley's letter to V. K. rowe of 07-03-63" (parties: J.P. Frawley / Rowe, V.K. & Hunt, W.H.) inside a local MDL-381 deposition/exhibit packet — <code>toxicdocs/3unclear__xxxx__na__Dioxin__RBqNnvVrnkZ54xyyyqd90yKV.txt</code> (lines 57656–57680; ToxicDocs <code>RBqNnvVrnkZ54xyyyqd90yKV</code>). The H281-series scan itself still to be pulled; this is the first production handle ever located. (Court paraphrase remains 565 F. Supp. at 1273.)	ToxicDocs RBqNnvVr... ; exhibit code H281 14-1 5
D O C B	12 Jul 1965 confidential J.P. Frawley / Hercules Powder Co. memo , recording a 9 Jul 1965 telephone conversation with Earl Farnham (Dow) : Farnham convinced no other producer had removed the contaminant; " Dow was extremely frightened that this situation might explode "; competitors marketing 2,4,5-T with "alarming amounts of acnegen"; "the whole industry will suffer"; "particularly fearful of a congressional investigation."	1 2 J ul 1 9 6 5	[P-cite] — UPGRADED from [2] (2026-06-09) . Verbatim text + exact date/author/subject now recovered from a litigation brief (Agent Orange MDL plaintiffs' brief), local <code>toxicdocs/3unclear__xxxx__na__Dioxin__jyBDvYGzG58gkKk3VmDbjxLK5.txt</code> (l.14017–14038) — not merely the U.S. Veteran Dispatch popular account. Also indexed in Poison Papers DowDATA as Bates A303 / 650712 (DocumentCloud 3418806, <i>to confirm</i>). Note: the "rabbit-liver study" detail in the old secondary account does NOT appear here → confirms the earlier conflation suspicion. The Bates-stamped memo scan is the next target.	brief: ToxicDocs jyBDvYGz... ; index: DowD ATA 3418 806 / Bates A303

C-adjacent — the *verified* 1965 inter-company dioxin primaries (the real documents near Doc B)

#	Title / cite	Date	Archive	Locator	Full text ?
C 1	Letter, V.K. Rowe (Dow) → "Dr. John P. Frawley, Hercules Powder Company" (and Monsanto's Emmet Kelly, Hooker, Diamond Alkali), convening a 23 Mar 1965 meeting on "highly toxic impurities" (dioxins) in 2,4,5-trichlorophenol. The single best documentary tie of Frawley to the inter-company dioxin discussions.	19 Mar 196 5	The Poison Papers (DocumentCloud project 28127)	Document Cloud doc 3253794; Poison Papers Bates B 1575	[P] yes (OCR read)
C 2	Hercules-authored memo / minutes of the 24 Mar 1965 "Chloracne Problem Meeting" at Dow Midland (Dow "fearful of a congressional investigation"; Hercules: PHS "happy to get in the act"); minutes drafted ~5 days later	24– 29 Mar 196 5	Poison Papers (Van Strum); paraphrased by Independent Science News (Latham & Sorge, 14 Nov 2017)	exact Document Cloud ID not yet isolated	[2] (paraphrase read)
C 3	Letter, V.K. Rowe (Dow) → Ross Milholland: dioxin "exceptionally toxic... tremendous potential for producing chloracne and systemic injury"; whole 2,4,5-T industry "hard hit" by restrictive legislation; "Under no circumstances may this letter be reproduced... outside of Dow."	24 Jun 196 5	Agent Orange MDL exhibit / 2009 Greenpeace release; quoted by multiple secondaries	primary scan not isolated	[2] (quoted)
C 4	Boehringer Ingelheim → Dow, warning the "extraordinary danger" of tetrachlorobenzodioxin "is not generally known"; + 1956 Monsanto confidential physician letter	19 Dec 196 4 / 195 6	Poison Papers	Document Cloud 3418422-1A-1-563	[P-cite]

D. Strand I — de minimis / threshold-of-regulation record

#	Title / cite	Date	Archive	Locator	Full text?
D 1	NRC Food Protection Committee, "Guidelines for Estimating Toxicologically Insignificant Levels of Chemicals in Food" — the monograph that reviewed Frawley's ACS paper; operative presumption 1.0 ppm (per FEMA/Oser–Hall 1972 quote), carcinogen/pesticide/heavy-metal exclusions, 11 pp.	19 69	National Academies Press	DOI 10.17226/20376 (catalog 20376)	[P-cite] (authoring committee confirmed; roster/verbatim recs gated — image-only)

#	Title / cite	Date	Archive	Locator	Full text?
D 1 b	NRC, "Evaluating the Safety of Food Chemicals" — 62 pp., reprints D1 as its Appendix	1970	National Academies Press	catalog 20498	[P-cite] (image-only)
D 2	Frawley → Members of the NAS Food Protection Committee "Ad Hoc Committee on Insignificant Levels," declining to take active part in drafting the report, 9 pp. (Directly ties Frawley to D1.)	12 Jul 1968	UCSF IDL — William Darby Papers	UCSF id yhgd0228	[P-cite]
D 3	FDA National Conference on Indirect Food Additives (opened by Commissioner Goddard) — now primary-confirmed via D8: Frawley's address is dated to it (Tuesday, 13 Feb 1968, Washington D.C.) and Summerson's rebuttal paper is reported (08_VINYL_CHLORIDE §4).	13 – 14 Feb 1968	D8 (Frawley's text); Food Chemical News 19 Feb 1968 (Summerson); Heckman history	[P] (event + Frawley's & Summerson's papers confirmed; full proceedings volume still not located)	
D 4	The "Ramsey Proposal" (Dr. Lessel L. Ramsey, FDA): exempt substances migrating ≤50 ppb; abandoned 3 Jun 1971 as "scientifically sound" but legally unworkable	1969 – 1971	Keller & Heckman history	PackagingLaw.com	[2]
D 5	A.M. Rulis, "De Minimis and the Threshold of Regulation," in <i>Food Protection Technology</i> (C.W. Felix ed., Lewis Publishers 1987), pp. 29–37 — explicitly credits Frawley 1967 (ref. 2); "duly noted by Frawley in 1967, using a different data base."	1987	regulations.gov mirror; UCSF legacy library	downloads.regulations.gov/EPA-HQ-OPP-2013-0821-0008/content.pdf ; UCSF tid rdc05c00	[P] yes (downloaded)
D 6	FDA Threshold of Regulation final rule, 21 CFR 170.39, 60 FR 36582 (17 Jul 1995, eff. 16 Aug 1995; 0.5 ppb). Cites Rulis 1992 , <i>not</i> Frawley directly (govinfo full-text: no "Frawley" hit).	1995	GovInfo / Federal Register	FR Doc. 95-17435 ; dockets 77P-0122 & 92N-0181	[P] yes
D 7	Frawley → Paul Johnson re NAS Food Protection Committee joint meeting (1 p.); Frawley → FDA Hearing Clerk re proposed food-additive procedural regs; Frawley → Richard L. Hall re reply to editor of <i>Science</i>	1967 – 1968	UCSF IDL — William Darby Papers	UCSF ids qngd0228 , xygd0228 , xmfd0228	[P-cite]

#	Title / cite	Date	Archive	Locator	Full text?
D 8	Frawley, " A Reasoned Approach to Regulation Based on Toxicologic Considerations, " <i>Food Drug Cosm. Law J.</i> 23(5):260–270 (May 1968) — this is the published text of Frawley's speech AT the Feb 13 1968 National Conference (D3) , i.e. the <i>Frawley side</i> of the Summerson showdown (08_VINYL_CHLORIDE §4). Byline confirms " Chief Toxicologist for Hercules, Incorporated, Wilmington, Delaware. " Restates the de minimis proposal in full (0.1 ppm diet / 0.2% container, ex-pesticides/heavy-metals; proposed for Reg. 121.2500(d)); now cites 245 chronic studies ("\$15–20M," "90% of all such studies"); admits " I personally had spent over a million dollars of my Corporation's money " on packaging safety, "all wasted"; claims 24 toxicologists endorsed the proposal in writing to FDA. (Note: the SPI agenda listed his paper as " <i>Toxicology of Indirect Food Additives</i> " — a working/agenda title; this is the published title.)	May 19 68	Local PDF + extract ed text + excerpt	papers/food_drug_1968_v23_n5.pdf (pp. 260–270); papers/fdc_lj_1968.txt; sources/Frawley_Reasoned-Approach_NationalConf_Feb1968_FDCLJ23-260_excerpt.md; HeinOnline hein.journals/foodlj23	[P] yes (read in full)

E. Strand III — Hercules / Jacksonville / dioxin record

#	Title / cite	Date	Archive	Locator	Full text?
E 1	Frawley & E. Ross Hart (Hercules) → William M. Upholt (EPA/USDA) re the Bionetics teratology study of 2,4,5-T performed for Hercules, 17 pp.	4 Mar 1971	UCSF IDL — William Darby Papers	UCSF id rxfb0228	[P-cite] (body refused programmatic fetch)
E 2	"Objections to and Modification of the Final Report... of the 2,4,5-T Advisory Committee" (Wilson, Dominick, Sterling), names Frawley and Hercules , 84 pp.	5 May 1971	UCSF IDL — William Darby Papers	UCSF id zkcb0228	[P-cite]
E 3	Direct Testimony of Dr. V. K. Rowe before EPA, <i>In re Dow Chemical et al.</i> , FIFRA Docket Nos. 415 et al. (Dow was lead 2,4,5-T registrant; no Hercules/Frawley in this item)	30 Oct 1980	USDA NAL, Young Collection	NAL item 2078 , Box 043 Folder 1025	[P-cite]
E 4	National Forest Products Association Statement of Position , <i>In re 2,4,5-T</i> , FIFRA Docket 295 (found while looking for a Hercules Statement of Position — none located)	n.d.	USDA NAL, Young Collection	NAL item 4787	[P-cite]
E 5	Dioxin Registry Report for Hercules, Inc. and Vertac Chemical Corp., Jacksonville AR (NIOSH IWS-117.20)	Jan 1991	CDC stacks; NTIS	stacks.cdc.gov/view/cdc/ 119117 ; NTIS PB2003103783	[abs] (PDF blocked the fetcher)
E 6	EPA Vertac, Inc. Superfund Site Profile (Reasor-Hill 1948 → Hercules 1961–76 → Transvaal/Vertac; Agent Orange 1964–68)	—	EPA cumulis	site id 0600023	[P] yes

#	Title / cite	Date	Archive	Locator	Full text?
E 7	"Vertac" entry, Encyclopedia of Arkansas (drums, 1979 dioxin-in-fish, \$102.9M/1998 & \$124M/2007 judgments)	—	CALS	encyclopediao farkansas.net/ entries/vertac- 2198	[P] yes
E 8	DOJ ENRD press releases: #506 (23 Oct 1998, \$102.9M) and #07-372 (18 May 2007, \$124M) Hercules/Vertac Superfund judgments	199 8 / 200 7	justice.gov v archive	as cited (403 to fetcher; figures in titles)	[2]

F. Biography / institutional record

#	Title / cite	Date	Archive	Locator	Full text?
F 1	SOT Charter Members list — "John P. Frawley, PhD"	—	Society of Toxicology	toxicology.org /about/Inm/ch arter.asp	[P] yes
F 2	SOT History (Hays) — Councilor 1961–62; Arnold J. Lehman Award 1987 ; Regulatory Affairs Committee chair	cove rs 196 1– 97	SOT	toxicology.org /about/history /docs/SOTHis tory_revised. pdf	[P] yes
F 3	SOT Awards booklets 2002-03 / 2004-05 / 2013-14 + 2003-04 In Memoriam — the deceased-asterisk bracket placing death ~2003–2004	200 2– 201 4	SOT Historical PDFs	toxicology.org /pubs/docs/Hi storical/...	[P] yes
F 4	Frawley, " O. Garth Fitzhugh " (tribute to his FDA mentor), <i>Food Cosmet. Toxicol.</i> 6(2):121–122	Aug 196 8	PubMed	PMID 4876430	[P-cite]
F 5	46th MASH Surgical Research Team page — "John P. Frawley, 1st Lt., MSC" (July 1953) — disambiguation-contested identity (see dossier §Biography)	195 3	46thmash.c om	46thmash.co m/46th-mash- 2	[P] yes (but identity = same man unconfir med)
F 6	SourceWatch — ISRTP president 1989/90, W. Gary Flamm VP, Health & Environment International Ltd. , Wilmington DE	—	SourceWate r	sourcewatch. org (ISRTP entry)	[2]
F 7	" Statement of John P. Frawley, Ph.D. Before the [House] Subcommittee on Health and the Environment " — DRAFT tobacco-industry testimony (Covington & Burling), never delivered . Confirms late-career tobacco consulting .	Mar –Apr 199 4	UCSF Industry Documents Library (Tobacco Institute / RJR)	UCSF ids zqxb0104 , lhyg0018 , hmkb0121 , tjhg0001 , xhyn0050	[P] yes (metadata + DRAFT body)

G. Negative / absence findings of record (important results in themselves)

#	Finding	What was searched
G 1	ToxicDocs holds nothing on this Frawley — CORRECTED (this earlier finding was WRONG) . ToxicDocs' native search API reports 251 documents matching "Frawley" and 39 matching the exact phrase "John P. Frawley," overwhelmingly in the Allied Signal / Society of the Plastics Industry vinyl-chloride (PVC) collection, 1958–1970 (plus a dioxin cluster). The earlier "nothing" conclusion relied on Google's <i>incomplete</i> site: index. Whether these are the Hercules toxicologist (topically likely — PVC = food-packaging = his domain; SPI = the threshold-of-regulation petitioner) or a namesake is UNCONFIRMED : the scans are image-only (JBIG2) and could not be OCR'd from this environment (WebFetch can't read them; <code>/api/document</code> 404s; Bash is sandboxed). Highest-priority open lead — see 05_OPEN_QUESTIONS A0.	toxicDocs <code>/api/search?q=Frawley (251). ?q="John P. Frawley" (39); cdn PDFs image-only</code>
G 2	Document A (1963 letter) not digitized anywhere searched (Poison Papers, ToxicDocs, UCSF IDL, USDA NAL, DocumentCloud full-text API).	DocumentCloud API <code>q="V. K. Rowe Frawley"</code> → only the 1965 B 1575 letter
G 3	No evidence Frawley ever testified before Congress. Dingell Aug 1967 witness = Goddard (not Frawley); Frawley absent from the read 1970 Senate 2,4,5-T witness index.	Heckman first-hand account; Cong. Rec. Daily Digest D406 (10 Aug 1967); NAL full-text of the 1970 hearing
G 4	No record of Frawley as a witness/affiant in the EPA FIFRA 2,4,5-T/Silvex proceedings (Docket 295/415); Dow (Rowe) was the industry witness.	NAL Young Collection; FIFRA docket items

Compiled from the `frawley-dossier` workflow recon phase (8 specialist agents). Acquire- and verify-phase additions (full opinion transcription, Doc B handle hunt, adversarial verdicts) are folded into the master dossier and open-questions files.