

TESTIMONY OF MALCOLM O. COUCH

The testimony of Malcolm O. Couch was taken at 9:43 a.m., on April 1, 1964, in the office of the U.S. attorney, 301 Post Office Building, Bryan and Ervay Streets, Dallas, Tex., by Mr. David W. Belin, assistant counsel of the President's Commission.

Mr. BELIN. Will you please rise and raise your right hand and be sworn, sir?

Do you solemnly swear that the testimony you're about to give will be the truth, the whole truth and nothing but the truth, so help you God?

Mr. COUCH. I do.

Mr. BELIN. Be seated, please.

Mr. BELIN. You are Malcolm O. Couch?

Mr. COUCH. That's right.

Mr. BELIN. Mr. Couch, we are taking your deposition here in Dallas to record your testimony for the President's Commission on the Assassination of President Kennedy—is that correct?

Mr. COUCH. That's right, sir.

Mr. BELIN. Do you request that an attorney be present here to represent you?

Mr. COUCH. No.

Mr. BELIN. We have written you about the taking of this deposition and I assume that you have waived notice of the taking of the deposition—is that correct?

Mr. COUCH. That's right.

Mr. BELIN. Mr. Couch, you have the right to look at the deposition and sign it, or you can follow the general custom and rely on the court reporter and waive the signing of the deposition—whatever you would like to do. If you would like to sign it, you can; if you want to waive signing it, you can also. Whatever you want to do.

Mr. COUCH. All right. I'll sign it.

Mr. BELIN. You want to sign it?

Mr. COUCH. Yes, sir.

Mr. BELIN. All right.

Mr. Couch, where do you live?

Mr. COUCH. 4215 Live Oak in Dallas.

Mr. BELIN. And how old are you?

Mr. COUCH. Twenty-five.

Mr. BELIN. And were you born in Texas?

Mr. COUCH. Yes; born in Dallas and raised in Dallas.

Mr. BELIN. And what is your educational background? Did you go through high school?

Mr. COUCH. I went to Woodrow Wilson High School here in Dallas, I have a Bachelor of Arts degree from John Brown University; and I will receive a Master of Theology degree this May from Dallas Seminary.

Mr. BELIN. You then plan, when you receive your Master of Theology degree, to become a minister?

Mr. COUCH. I will be ordained. I don't know if I will have a church or not, but I will be ordained.

Mr. BELIN. Are you married, Mr. Couch?

Mr. COUCH. Yes.

Mr. BELIN. Any family at all?

Mr. COUCH. Yes; one boy—since last Friday.

Mr. BELIN. Since last Friday? Well, congratulations to you. I assume your wife and baby are doing well?

Mr. COUCH. Yes, sir.

Mr. BELIN. What did you major in at college?

Mr. COUCH. Social science.

Mr. BELIN. What is your present occupation, Mr. Couch?

Mr. COUCH. Part-time television news cameraman with WFAA-TV in Dallas.

Mr. BELIN. When you say "part time," do you mean you're going to school part time—

Mr. COUCH. Right.

Mr. BELIN. And spending part time with WFAA-TV?

Mr. COUCH. Right.

Mr. BELIN. How long have you been employed by WFAA-TV?

Mr. COUCH. Uh—for 2 years straight. But I worked with them full and part time, I believe, back in—starting in 1955 to 1957.

Mr. BELIN. And then what happened in 1957?

Mr. COUCH. I went to college.

Mr. BELIN. You went to college full time?

Mr. COUCH. Right.

Mr. BELIN. And then you got out in 1961?

Mr. COUCH. I got out in January 1960.

Mr. BELIN. January 1960?

Mr. COUCH. Yes—and came back to Dallas and went into graduate school here.

Mr. BELIN. And when you came back to Dallas, you went to work with WFAA-TV?

Mr. COUCH. No; no. I began going to Dallas Seminary, but—uh—I worked for Keitz & Herndon Film Studios—[spelling] K-e-i-t-z and H-e-r-n-d-o-n.

Mr. BELIN. Have you had any other jobs since you've gotten out of college other than those?

Mr. COUCH. I worked a year for Camp Elhar, as executive director of the camp. It's a Christian camp here in Dallas.

Mr. BELIN. Is this for youngsters?

Mr. COUCH. Right.

Mr. BELIN. Boys and girls?

Mr. COUCH. Right.

Mr. BELIN. And when did that employment take place?

Mr. COUCH. Uh—I believe it was September 1961—and ended in September 1962. I started working for WFAA in March of 1962. And I've been there 2 years.

Mr. BELIN. In other words, part of the time while you were working with this camp, you were also part time with WFAA-TV?

Mr. COUCH. Right.

Mr. BELIN. And then when you started to work on your Masters in Theology, you stopped working?

Mr. COUCH. No. I started work on my Masters when I came back from college—

Mr. BELIN. Oh, I see.

Mr. COUCH. In January of 1960. It's a 4-year course.

Mr. BELIN. I see.

Mr. COUCH. I want to take you back to November 22, 1963, and ask you whether or not you were employed by WFAA-TV at that time?

Mr. COUCH. Yes; I was.

Mr. BELIN. In connection with your employment, what is the fact as to whether or not you had anything to do with the coverage of the visit of President Kennedy to Dallas?

Mr. COUCH. Yes; I did.

Mr. BELIN. Could you just state what your duties were and what you did that day?

Mr. COUCH. I was assigned to cover the arrival of the President at the airport and to ride in the motorcade through town and, then, to ride with the motorcade of the President back to the airport when he left.

Mr. BELIN. Now, when you were assigned, were you assigned as a reporter, as a photographer, or in what capacity?

Mr. COUCH. As a photographer.

Mr. BELIN. Would this be moving picture film or still shots, or both?

Mr. COUCH. Moving only.

Mr. BELIN. Moving picture film only?

Mr. COUCH. Yes.

Mr. BELIN. Were you at Love Field in Dallas when the President arrived?

Mr. COUCH. That's right; uh-huh.

Mr. BELIN. Did you take moving pictures of him there?

Mr. COUCH. That's right.

Mr. BELIN. Then you got in the motorcade?

Mr. COUCH. Right; uh-huh.

Mr. BELIN. And the motorcade proceeded, first, from Love Field toward downtown Dallas—is that correct?

Mr. COUCH. That's right.

Mr. BELIN. Do you remember the route you took through downtown Dallas?

Mr. COUCH. Uh—roughly. It was out through the airport parkway to Mockingbird Lane to Lemmon, down Lemmon to Turtle Creek, down Turtle Creek to—uh—I'm not sure of those streets. I think McKinney or Cedar Springs. I'm not sure.

Mr. BELIN. Well, if you aren't particularly sure—okay. What about when you got downtown to the center of Dallas? Do you remember what streets you went on?

Mr. COUCH. Yes. Well, we came in on Harwood and then turned right on Main at the City Hall.

Mr. BELIN. And then you took Main to where?

Mr. COUCH. Main down to—uh—Houston.

Mr. BELIN. All right. You were heading, now, west on Main down to Houston?

Mr. COUCH. Right.

Mr. BELIN. About where in the motorcade was your car? Do you remember offhand?

Mr. COUCH. Uh-uh—roughly—and I'm not sure—the fifth or sixth car back from the lead car. I'm not sure which one.

Mr. BELIN. Now, do you remember, as you approached Houston Street on Main about how fast the motorcade was going?

Mr. COUCH. I would estimate—uh—20 miles an hour. The speed had picked up some. Everyone gave a sigh a relief that—uh—it was over; and one of the cameramen, I remember, his camera broke and another one was out of film. Everyone was relaxed. And—uh—of course, then we turned north on Houston, and it was there that we heard the first gunshot.

Mr. BELIN. All right. Before we get to the first gunshot—do you remember who was riding in the car with you?

Mr. COUCH. Uh—as best I can, it was Jimmy Darnell—Channel 5; uh—Bob Jackson—Times Herald; Jim Underwood—KRLD-TV; and the fellow—uh—Mr. Dillard—Tom Dillard—Dallas Morning News. And the driver of the car; I don't know his name.

Mr. BELIN. Were you sitting in the front or the back seat?

Mr. COUCH. Sitting in the back.

Mr. BELIN. Do you remember anything about your position as to the way you were sitting in the back?

Mr. COUCH. Yes: I was almost in the middle and sitting on the—it was a convertible—and sitting on the back of the back seat, with my feet on the seat.

Mr. BELIN. Your feet were on the seat—and you would be sitting on the top of the back seat?

Mr. COUCH. That's right.

Mr. BELIN. There were three of you in the back?

Mr. COUCH. Yes; three in the back.

Mr. BELIN. And were you in the middle or to the right or to the left?

Mr. COUCH. I was about in the middle.

Mr. BELIN. All right. Now, as you turned north on Houston, do you remember about how fast you were going?

Mr. COUCH. Well, I'd say still that—of course, allowing for the turn—that the pace of the motorcade was about the same. We were clipping along and, as I said, I do have films after we had turned the other corner, and you could still see that the motorcade was moving fairly fast.

Mr. BELIN. Were there any motorcycle policemen riding alongside the motorcade, that you remember?

Mr. COUCH. Yes; there were.

Mr. BELIN. Do you remember the names of any of those people?

Mr. COUCH. No; I don't.

Mr. BELIN. Were they two-wheel or three-wheel motorcycles?

Mr. COUCH. Two-wheel.

Mr. BELIN. Was there one riding alongside of your car?

Mr. COUCH. Uh—he was. I remember distinctly one was on my right going down Main. They would jockey from time to time in different positions. As I recall, on Houston, I don't remember any beside us on Houston. As I say, they would fade back and forth. Sometimes they would be; sometimes they wouldn't.

Mr. BELIN. All right.

Now, as you turned onto Houston, you said that you heard what you described as a—

Mr. COUCH. It sounded like a motorcycle backfire at first—the first time we heard it—the first shot.

Mr. BELIN. Do you remember about where your car was at the time you heard the first noise?

Mr. COUCH. I would say—uh—15 or 20 feet from the turn—from off of Main onto Houston.

Mr. BELIN. Fifteen or 20 feet from the turn?

Mr. COUCH. We had already completed the turn.

Mr. BELIN. After you had completed the turn, then 15 or 20 feet further on you heard the first shot—the first noise?

Mr. COUCH. Because, I remember I was talking and we were laughing and I was looking back to a fellow on my—that would be on my right—I don't know who it was—we were joking. We had just made the turn. And I heard the first shot.

Mr. BELIN. What happened—or what did anyone say?

Mr. COUCH. As I recall, nothing—there was no particular reaction; uh—nothing unusual. Maybe everybody sort of looked around a little, but didn't think much of it. And—uh—then, in a few seconds, I guess from 4-5 seconds later, or even less, we heard the second shot. And then we began to look—uh, not out of thinking necessarily it was a gunshot, but we began to look in front of us—in the motorcade in front of us. And, as I recall, I didn't have any particular fears or feelings at the second shot. By the third shot, I felt that it was a rifle. Almost sure it was. And, as I said, the shots or the noises were fairly close together, they were fairly even in sound—and—uh, by then, one could recognize, or if he had heard a high-powered rifle, he would feel that it was a high-powered rifle. You would get that impression.

Mr. BELIN. Do you remember where your vehicle was by the time you heard the third shot?

Mr. COUCH. I'd say we were about 50 feet from making—or maybe 60 feet—from making the left-hand turn onto Elm.

Mr. BELIN. Did you hear more than three shots?

Mr. COUCH. No.

Mr. BELIN. Had you heard any noises, what you'd describe like a motorcycle backfiring or firecrackers, prior to the time that you made your turn north onto Houston?

Mr. COUCH. Well, way uptown on Main Street, a motorcycle did backfire right beside us—and we all jumped and had a good laugh over it. And the three shots sounded, at first—the first impression was that this was another motorcycle backfiring.

Mr. BELIN. Now, between the first and the second shots, is there anything else you remember doing or you remember hearing or seeing that you haven't related here at this time?

Mr. COUCH. Nothing unusual between the shots. Uh—as I say, the first shot, I had no particular impression; but the second shot, I remember turning—several of us turning—and looking ahead of us. It was unusual for a motorcycle to backfire that close together, it seemed like. And after the third shot, Bob

Jackson, who was, as I recall, on my right, yelled something like, "Look up in the window! There's the rifle!"

And I remember glancing up to a window on the far right, which at the time impressed me as the sixth or seventh floor, and seeing about a foot of a rifle being—the barrel brought into the window.

I saw no one in that window—just a quick 1-second glance at the barrel.

Mr. BELIN. In what building was that?

Mr. COUCH. This was the Texas Book Depository Building.

Mr. BELIN. At the corner of Houston and Elm in Dallas?

Mr. COUCH. That's right.

Mr. BELIN. You said it was the sixth or the seventh floor. Do you know how many floors there are in that building—or did you know at that time?

Mr. COUCH. No; I didn't know at that time.

Mr. BELIN. Did it look like to you he was on the top floor or next to the top floor or the second to the top floor—or——

Mr. COUCH. It looked like it was the top. And when you first glance at the building, you're thrown off a little as to the floors because there's a ridge—uh, it almost looks like a structure added onto the top of the building, about one story above. So, you have to recount.

Of course, at the time, I wasn't counting, but——

Mr. BELIN. You just remember, to the best of your recollection, that it was either the sixth or seventh floor?

Mr. COUCH. That's right.

Mr. BELIN. And when you say, "the far right"——

Mr. COUCH. That would be the far east.

Mr. BELIN. The far east of what side of the building?

Mr. COUCH. The south side of the building.

Mr. BELIN. Do you remember whether or not that window at which you saw the rifle, you say, being withdrawn—first of all, could you tell it was a rifle?

Mr. COUCH. Yes, I'd say you could. Uh—if a person was just standing on the—as much as I saw, if the factors that did happen, did not happen, you might not say that it was a rifle. In other words, if you just saw an object being pulled back into a window, you wouldn't think anything of it. But with the excitement intense right after that third shot and what Bob yelled, my impression was that it was a rifle.

Mr. BELIN. Did you see anything more than a steel barrel of a rifle?

Mr. COUCH. No.

Mr. BELIN. Could you tell whether or not the rifle had any telescopic sight on it?

Mr. COUCH. No.

Mr. BELIN. Did you see any of the stock of the rifle?

Mr. COUCH. No.

Mr. BELIN. Did you see any person pulling the rifle?

Mr. COUCH. No.

Mr. BELIN. Do you remember whether or not, if you can remember, the window was open or halfway open or what?

Mr. COUCH. It was open. To say that it was half or three-quarters open, I wouldn't say. My impression was that it was all the way open—but that was an impression.

Mr. BELIN. Did you see anything else in the window that you remember—any boxes or anything like that?

Mr. COUCH. No; I didn't.

Mr. BELIN. You didn't notice whether there was or was not—or do you definitely remember that you did not notice any?

Mr. COUCH. No; I didn't notice anything.

Mr. BELIN. Did you see any other people in any other windows in the building?

Mr. COUCH. Yes; I recall seeing—uh—some people standing in some of the other windows—about, roughly, third or fourth floor in the middle of the south side. I recall one—it looked like a Negro boy with a white T-shirt leaning out one of those windows looking up—up to the windows up above him.

Mr. BELIN. Uh-huh. Is there anything else you can remember about the building?

Mr. COUCH. No; that's just about the only impression I had at the moment.
Mr. BELIN. Now, you related what you heard Bob Jackson say. Did anyone else say anything in the car?

Mr. COUCH. No one else said anything, that I recall, about a rifle, or anything.

Mr. BELIN. Where was the car when you saw this rifle being withdrawn?

Mr. COUCH. I'd say about 25 feet before we made the turn onto Elm. Our car was facing the south side of the building.

Mr. BELIN. All right. Then what happened after Bob Jackson made his exclamation and you saw what you just related?

Mr. COUCH. Well, I picked up my camera. As I recall, I had it in my hand, but it was down leaning against my legs. And I picked it up and made a quick glance at a setting and raised it to my eye. And—uh—you can see from my film that we're just turning the corner. We start the turn and we turn the corner, and you can see people running. As I recall, there's a quick glance at the front entrance of the Texas Depository Book Building. You can see people running and you can see about the first three cars, maybe four, in front of me as we complete the turn.

And then I took pictures of—uh—a few people on my left and a group, or a sweeping, of the crowd on my right standing on the corner.

Mr. BELIN. Did you take any pictures of the School Book Depository Building itself?

Mr. COUCH. Not of the south side at that moment.

After we went, say, 50 to 75 feet on down Elm, uh—we began to hang on because the driver picked up speed. We got down under the—I think there's three trestles there, three crossings underneath the—uh—at the very bottom of Elm Street—

Mr. BELIN. Is that what they call the triple-underpass?

Mr. COUCH. Right.

And—uh—I think, as I recall, right after we'd made the turn on Elm, one or two of the fellows jumped out. But after we got all the way down underneath the three trestles we finally persuaded the driver—who wasn't too anxious to stop—to stop and—uh—we all jumped out.

And I ran, I guess it was about 75 yards or a little more back up to the School Depository Building and took some sweeping pictures of the crowd standing around. I didn't stay there long.

Mr. BELIN. Did you take any pictures of the Depository Building entrance?

Mr. COUCH. No—uh—

Mr. BELIN. When you came back up there?

Mr. COUCH. Not with determination. I cannot recall at this moment whether some of my pictures I took when I ran back might have a sweeping shot of the entrance through a wide angle lens. But not with determination. I didn't plan to take pictures of it.

Mr. BELIN. Would these shots—these wide angle lens shots, if anyone were standing in front of the building or leaving the building at that time, would you be able to identify them, or would they be too far away?

Mr. COUCH. They would be too far away. Possibly if the frames were blown up, one might determine if someone was standing there—identify someone.

Mr. BELIN. About how many minutes after the last shot would you say you came back to take these pictures?

Mr. COUCH. Well, I'd say it took me—uh—maybe a minute and a half to get back to there after this third shot—because we weren't but seconds getting down underneath that underpass after we made the turn.

Mr. BELIN. Uh-huh.

Mr. COUCH. And—uh—I jumped out and ran back. So, I'd say not over a minute and a half.

Mr. BELIN. And then you started taking general sweeping shots of the area?

Mr. COUCH. Right.

Mr. BELIN. Were most of the shots directed at people along the side there as to what their reactions were, or were most of the shots directed at the School Book Depository Building?

Mr. COUCH. Mostly of the people standing around, the policemen and shots such as this.

Mr. BELIN. In what direction, generally, would the camera have been pointed, and where would you have been standing when you took these pictures?

Mr. COUCH. Some of the pictures, I remember, the camera was pointing south—because I was standing on the little knoll which is just at the foot and west of the Depository Building, where the little park area begins. There's a sidewalk that runs between the Book Depository property, I would assume and the park. And I was standing on that little sidewalk.

Mr. BELIN. And your camera was pointing south?

Mr. COUCH. Pointing south. That's right. Now, after I had taken I don't know how many feet of film of people standing around, I—uh—we—I think there was one or two other fellows with me and who they were, now, I can't remember; they were photographers—we stopped a car that was going by with a boy in it—a young boy of about high school age—and asked him to take us out to Parkland. And as the car started off, I started my camera and I have a sweeping shot moving west from about—uh—maybe the middle of the Book Depository Building from ground level on past the park area—a sweeping shot with the car moving.

Mr. BELIN. And that's about it insofar as the School Book Depository Building is concerned?

Mr. COUCH. Well, no. After we got out to Stemmons—they'd set up a road-block just as you entered Stemmons Expressway.

Mr. BELIN. Uh-huh.

Mr. COUCH. We jumped out of the car and I took, I believe it was, a 2-inch lens shot of the Book Depository Building of the west wall.

Mr. BELIN. Of the west wall?

Mr. COUCH. Yes.

Mr. BELIN. Not of the front entrance?

Mr. COUCH. No.

Mr. BELIN. Is there any particular reason, Mr. Couch, why you didn't take your first pictures of the School Book Depository Building itself when you say you saw a rifle being withdrawn?

Mr. COUCH. Well, uh—as best I can recall, the excitement on the ground of people running and policemen “revving” up their motorcycles—and I have a real nice shot of a policeman running toward me with his pistol drawn—the activity on the ground kept my attention. The reason I did not stay and take pictures of the Depository Building—which I had originally intended to do when I got out of the motorcade—was that—uh—another cameraman from our station, A. J. L'Hoste—[spelling] L'-H-o-s-t-e—he came running up and—uh—when he ran up, why I said, “You stay here and get shots of the building and go inside—and I'm going to go back—I'm going to follow the President.”

Mr. BELIN. All right. Was he also a moving picture cameraman?

Mr. COUCH. Yes; right.

Mr. BELIN. Where was he at the time you made this statement?

Mr. COUCH. Uh—he was standing on that little sidewalk that runs between the—I met him on the little sidewalk between the Book Depository property and the beginning of the parkway.

Mr. BELIN. That would be the west side of the Depository Building?

Mr. COUCH. That's right; that's right. It's there that I saw the blood on the sidewalk.

Mr. BELIN. All right. Now, you say you saw blood on the sidewalk, Mr. Couch?

Mr. COUCH. That's right.

Mr. BELIN. Where was that?

Mr. COUCH. This was the little walkway—steps and walkway that leads up to the corner, the west corner, the southwest corner of the Book Depository Building. Another little sidewalk, as I recall, turns west and forms that little parkway and archway right next to the Book Depository Building.

Mr. BELIN. Did this appear to be freshly created blood?

Mr. COUCH. Yes; right.

Mr. BELIN. About how large was this spot of blood that you saw?

Mr. COUCH. Uh—from 8 to 10 inches in diameter.

Mr. BELIN. Did people around there say how it happened to get there, or not?

Mr. COUCH. No; no one knew. People were watching it—that is, watching it carefully and walking around it and pointing to it.

Uh—just as I ran up, policemen ran around the west corner and ran—uh—northward on the side of the building. And my first impression was that—uh—that they had chased someone out of the building around that corner, or possibly they had wounded someone. All the policemen had their pistols pulled. And people were pointing back around those shrubs around that west corner and—uh—you would think that there was a chase going on in that direction.

Again, the reason that I didn't follow was because A. J. had come up, and my first concern was to get back with the President.

Mr. BELIN. This pool of blood—about how far would it have been north of the curbline of Elm Street as Elm Street goes to the expressway?

Mr. COUCH. I'd say—uh—well, from Elm Street, you mean, itself?

Mr. BELIN. Yes. This is from that part of Elm Street that goes into the expressway?

Mr. COUCH. I'd say—uh—50 to 60 feet, and about 15 feet or 10 to 15 feet from the corner of the Texas Depository Building.

Mr. BELIN. It would have been somewhere along that park area there?

Mr. COUCH. Right.

Mr. BELIN. Was there anything else you noticed by this pool of blood?

Mr. COUCH. No. There were no objects on the ground. We looked for something. We thought there would be something else, but—

Mr. BELIN. There was nothing?

Mr. COUCH. Huh-uh.

Mr. BELIN. Now, this A. J.—?

Mr. COUCH. L'Hoste. That's "L" apostrophe.

Mr. BELIN. Yes; I have that. I have made a note of the spelling, along with the phonetic sound.

Do you know if he got any pictures of the south side of the School Book Depository?

Mr. COUCH. No; I don't recall what he got—as I recall—now, I may be wrong, this is a guess—that he did not take any pictures.

Mr. BELIN. He did not take any?

Mr. COUCH. No.

Mr. BELIN. Do you know of anyone that took any pictures of the south side of the School Book Depository Building, particularly the front entrance of the building, shortly after the assassination?

Mr. COUCH. No; only what I have seen in Time magazine.

Mr. BELIN. Only what you've seen in Time magazine?

Mr. COUCH. Right.

Mr. BELIN. Now, did you ever know or hear of Lee Harvey Oswald before any of this?

Mr. COUCH. No.

Mr. BELIN. Have you ever met Jack Ruby?

Mr. COUCH. No.

Mr. BELIN. There is an FBI report that states that you had heard hearsay statements that someone had seen Jack Ruby emerge from the rear of the Texas School Book Depository Building around that time. Did anyone ever tell you that?

Mr. COUCH. Yes. Uh—where I first heard it, I could not now recall; but—uh—the story went that—uh—Wes Wise, who works for KRLD—

Mr. BELIN. TV?

Mr. COUCH. Yes—saw him moments after the shooting—how many moments, I don't know—5 minutes, 10 minutes—coming around the side of the building, coming around the east side going south, I presume.

Mr. BELIN. Did you ever talk to Wes Wise as to whether or not he actually saw this, or is this just hearsay?

Mr. COUCH. No; I didn't. This is just hearsay.

Mr. BELIN. Let me ask you this: Is there any observation, other than hearsay, that you have about this entire sequence of events that you have not related here?

Mr. COUCH. No; I can't think of anything. No.

Mr. BELIN. In this same FBI report of an interview with you, it states that—and by the way, I did not show this to you when you first chatted about this—is that correct?

Mr. COUCH. Uh-huh; that's right.

Mr. BELIN. There is a statement as to the time sequence—that you heard, first, two loud noises about 10 seconds apart. And you related here that it would have been 5 seconds apart or less. Do you remember whether or not at the time you gave your first statement to the FBI you said 10 seconds or would you have said about 10 seconds or would you have said less than 10 seconds—or could this be inaccurate, as sometimes happens?

Mr. COUCH. I don't recall now. Ten seconds is not a reasonable time; even if I said "about 10 seconds." I know a little bit more about timing than that. We have to time our stories pretty close—and that's a long time.

Mr. BELIN. And what's your best recollection now as to the amount of time between shots?

Mr. COUCH. Well, I would say the longest time would be 5 seconds, but it could be from 3 to 5.

Mr. BELIN. And would this be true between the first and the second shots as well as between the second and third—or would there have been a difference?

Mr. COUCH. As I recall, the time sequence between the three were relatively the same.

Mr. BELIN. Now, Mr. Couch, shortly before we commenced taking this deposition, you and I met for the first time. Is that correct?

Mr. COUCH. That's correct.

Mr. BELIN. And then we came to this room and we chatted for a few minutes before we started taking a formal deposition. Is that correct?

Mr. COUCH. That's correct.

Mr. BELIN. Now, is there anything that we talked about pertaining to the assassination that in any way differs or conflicts with the testimony that you have just given?

Mr. COUCH. No; no.

Mr. BELIN. What is the fact as to whether or not I questioned you in great detail about each question or whether or not I just asked you to relate the story to me?

Mr. COUCH. You asked me to give general highlight impressions before we began.

Mr. BELIN. And then, after you gave those to me, we started taking the deposition—is that correct?

Mr. COUCH. That's correct.

Mr. BELIN. And then you repeated on the deposition what we had talked about—is that right?

Mr. COUCH. That's right—in more detail.

Mr. BELIN. Is there anything else that you can think of at this time which, in any way, would affect the investigation of the assassination of President Kennedy?

Mr. COUCH. No; I cannot think of anything.

Mr. BELIN. Well, we want to thank you very much for taking your time to come down here. We know that you're a busy man. We also would like you to convey our thanks to station WFAA-TV for allowing you to come down here. We appreciate it very much.

Mr. COUCH. Thank you, sir.

Mr. BELIN. Mr. Couch, we're going back on the record again. You're still under oath—and I'm not quite sure whether I asked this question, but I had better ask it again.

When you saw this rifle being withdrawn. About how much of it could you see at first?

Mr. COUCH. I'd say just about a foot of it.

Mr. BELIN. And in what direction was the barrel pointing at the time you saw it being withdrawn?

Mr. COUCH. Approximately a 45° angle westward—which would be pointing down Elm Street.

Mr. BELIN. Down Elm Street as it goes into the expressway there?

Mr. COUCH. That's right.

Mr. BELIN. And when you say "45° angle" would that be up or down, or are you referring to the angle of incline, or the angle of west and south?

Mr. COUCH. The angle of incline—from a horizontal position.

Mr. BELIN. All right. So, you would estimate about a 45° angle downward pointing in what would be a southwesterly direction?

Mr. COUCH. Uh—westerly direction. From looking straight on at the building, one could not tell the—uh—angle, whether it was more southward or not. In other words, something sticking out the building, I couldn't tell. It was not—it did not appear to me that it was sticking straight out the window, so to speak.

Mr. BELIN. Yes. Is there anything else that you noticed about the gun?

Mr. COUCH. No.

Mr. BELIN. All right. Thank you. I just wanted to make sure I got that on the record.

TESTIMONY OF TOM C. DILLARD

The testimony of Tom C. Dillard was taken at 9:15 a.m., on April 1, 1964, in the office of the U.S. attorney, 301 Post Office Building, Bryan and Ervay Streets, Dallas, Tex., by Mr. Joseph A. Ball, assistant counsel of the President's Commission.

Mr. BALL. State your name.

Mr. DILLARD. Tom C. Dillard.

Mr. BALL. Will you stand and raise your right hand, please?

Mr. DILLARD (Complying).

Mr. BALL. Do you solemnly swear the testimony given before this Commission will be the truth, the whole truth, and nothing but the truth, so help you God?

Mr. DILLARD. I do.

Mr. BALL. My name is Joseph A. Ball. I am staff counsel for the President's Commission on the Assassination of President Kennedy. You have already been requested to be present have you not—

Mr. DILLARD. By letter; yes.

Mr. BALL. By letter which you received last week?

Mr. DILLARD. Yes, sir.

Mr. BALL. What is your occupation?

Mr. DILLARD. I am a photographer.

Mr. BALL. I might state the purpose of questioning you is to ask you questions as to any knowledge you might have as to the facts concerning the assassination of President Kennedy on November 22, 1963, at Dallas, Tex.

Mr. DILLARD. I understand. My occupation is journalist; I am chief photographer of the Dallas Morning News, do some aviation writing but my primary job is head of the photographic department and, of course, I do outside work for the paper on photographic work.

Mr. BALL. How old are you?

Mr. DILLARD. I'm 49.

Mr. BALL. What has been your general education?

Mr. DILLARD. High school, very few college courses.

Mr. BALL. What?

Mr. DILLARD. High school and very few college courses.

Mr. BALL. Where did you go to school?

Mr. DILLARD. I didn't go to school. I graduated Fort Worth, from the old Central High School, went to the Officer Candidate School in the Military and Air University.

Mr. BALL. How long have you been with the paper?

Mr. DILLARD. The Dallas News since 1947 and I was with the Star Telegram, went to work in 1929.

Mr. BALL. Have you been a photographer for the papers all these years?