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In The Matter Of:

Assassination Records Review Board

Re: President John F. Kennedy

Deposition of Robert J. Groden

July 2, 1996

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BEFORE THE
ASSASSINATION RECORDS REVIEW BOARD

In Re: :
PRESIDENT JOHN F. KENNEDY :
Claymont, Delaware

Tuesday, July 2, 1996

The deposition of ROBERT J. GRODEN, called
for examination by counsel for the Board in the
above-entitled matter, pursuant to notice, at the
Wilmington Hilton, 630 Naamans Road, Claymont,
Delaware, convened at 10:12 a.m. before Robert H.
Haines, a notary public, when were present on
behalf of the parties:

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APPEARANCES:

On Behalf of the Plaintiff:

T. JEREMY GUNN, ESQ.

General Counsel

Assassination Records Review Board

600 E Street, N.W., Second Floor

Washington, D.C. 20530

(202) 724-0088

ALSO PRESENT:

CHARLES W. MAYN, ESQ.

U.S. National Archives

LAURA DENK and DOUGLAS HORNE

Assassination Records Review Board

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PROCEEDINGS

[1] Whereupon,
[2] ROBERT J. GRODEN
[3] was called for as a witness and, having been first
[4] duly sworn, was examined and testified as follows:
[5] EXAMINATION BY COUNSEL FOR THE
[6] ASSASSINATION RECORDS REVIEW BOARD
[7] BY MR. GUNN:
[8]

[9] Q: Would you state your name for the record,
[10] please?

[11] A: Robert Jacob Groden.

[12] Q: What is your address?

[13] A: 212 Emily Lane; Boothwyn, Pennsylvania
[14] 19061.

[15] Q: Mr. Groden, I am a representative of the
[16] Assassination Records Review Board. My name is
[17] Jeremy Gunn. I am the general counsel and the
[18] associate director for research and analysis for
[19] the Review Board.

[20] I'm accompanied here today by Laura Denk,
[21] who is a senior analyst with the Review Board, as
[22] well as by Douglas Horne, who is a senior analyst

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[1] at the Review Board. Also present in the room is
[2] Mr. Charles Mayn, who is affiliated with the
[3] National Archives.
[4] Mr. Groden, I would like to remind you, as
[5] we discussed shortly before the deposition began,
[6] that this deposition is being conducted pursuant
[7] both to the subpoena that was issued to you, as
[8] well as being under the auspices of the federal
[9] perjury statute. It is important during the course

[10] of the deposition that you tell the truth and the
[11] whole truth, as you have sworn.

[12] Mr. Groden, do you remember that I have
[13] informed you that you are entitled to have counsel
[14] here today?

[15] A: Yes.

[16] Q: And did you make the decision not to have
[17] counsel?

[18] A: Well, I certainly can't afford counsel.
[19] So, even if I wanted to, I couldn't.

[20] Q: Mr. Groden, could you describe for me the
[21] general background you have in areas related to
[22] photographic record related to the Kennedy

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[1] assassination?

[2] A: Well, President Kennedy was shot on my
[3] eighteenth birthday, November 22nd, 1963. And
[4] starting with the early issues of Life magazine, I
[5] was fascinated by the fact that the photographic
[6] record did exist. Back in the beginning, we had no
[7] concept—nobody had any concept of how many parts
[8] of the photographic record actually existed.

[9] And through the years, as time went by and
[10] more and more started to surface, being a
[11] photographer and being interested in photographic
[12] images and the history of the case, I—as probably
[13] every other researcher in the case—wanted to
[14] examine those items. But they were not available.

[15] I had called up UPI, and asked to examine
[16] the Nix and Muchmore films. They, of course,
[17] refused. They said they would charge \$10,000 just
[18] to inspect the films—just to look at them. And
[19] the Zapruder film was locked up in Life magazine's
[20] possession. And none of them were available to any
[21] researcher or any member of the public.

[22] In 1969, I started working for a

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[1] photographic—I'm sorry—motion picture optical
[2] effects house in New York City, called EFX
[3] Unlimited. Over a period of several months, my
[4] employer and I discovered that we had a mutual
[5] interest in the Kennedy assassination as a historic
[6] investigation.

[7] And after several months, he had showed me
[8] that he had been, in fact, employed by Life
[9] magazine—by Time-Life, Incorporated to blow up the
[10] original eight millimeter film of the assassination
[11] to 35 millimeter, with the object being a
[12] documentary that Time-Life was considering doing.

[13] Q: Could I interrupt you there for a moment?

[14] A: Sure.

[15] Q: What was the name of the person for whom
[16] you worked at EFX Unlimited?

[17] A: His name was Mo Weitzman. And he showed
[18] me the copy that he had kept—the mechanic's copy
[19] that was left over from the work that they had done
[20] to the film.

[21] Q: If I can interrupt you again.

[22] A: Sure.

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[1] Q: Was the mechanic's copy a 35 millimeter?

[2] A: Yes, it was.

[3] Q: And was that a positive or a negative?

[4] A: Positive.

[5] Q: Was it your understanding that that 35
[6] millimeter positive was taken—or copied directly
[7] from the original, or was there an intermediary
[8] step?

[9] A: There would be a negative involved.

[10] Q: So, the mechanic's copy would have a been
[11] a second generation. Would that be fair to say?

[12] A: That's correct. It would be— It was a
[13] test print from the copies that they had made from
[14] the original. At that time no one, to my
[15] knowledge, had ever taken an eight millimeter
[16] film—an original, regular eight millimeter film
[17] and blown it up to 35 millimeter.

[18] They had described the steps that they
[19] went through, in order to make it—how involved it
[20] was. They had to take the bellows off the camera,
[21] extend it beyond its usual range, refocus it, and
[22] shoot it in the dark at a very, very long exposure

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[1] time because of the degree of blowup.

[2] And it is my impression that they made
[3] several negatives for Life magazine. They did not
[4] keep any of the negatives. All they had was one
[5] test print that had come back.

[6] Q: Just so I'm clear here. There were
[7] several—it was your understanding that there were
[8] several negatives made from the original—camera-original
[9] Zapruder film?

[10] A: Right. On the roll itself, it said "third
[11] take". On this particular print, it said "third
[12] take". So, I assume that they made at least three
[13] negatives. Probably at different exposures, to get
[14] the best exposure.

[15] Q: And would it be fair to say that you have
[16] never seen any of the originals taken directly from
[17] the camera-original Zapruder film?

[18] A: I have seen the Secret Service copy. The
[19] HSCA people told me that it was the Secret
[20] Service's original duplicate copy.

[21] Q: Okay.

[22] A: Let's see. Anyway, Mr. Weitzman showed me

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[1] the film—hand-held. A 21-second film in
[2] 35 millimeter is virtually impossible to project.
[3] It's very, very difficult, and goes by very, very
[4] quickly. The original film was shot at 18.3 frames
[5] per second. And all 35 millimeter projectors play
[6] back at 24. So, it would play back at about a
[7] third to a half again as fast as it was originally
[8] taken.

[9] Anyway, Mr. Weitzman granted me access to
[10] the print, to make optical effects copies. What I
[11] did is, I stabilized the film. The original
[12] Zapruder film is very shaky.

[13] You know, Abraham Zapruder was an older
[14] man. He had vertigo. He had to be held up by his
[15] secretary, Marilyn, to keep him from falling over.

[16] So, the President, in successive frames,
[17] would appear all over the film. And it made it
[18] virtually impossible for anybody to examine what
[19] was going on.

[20] What I did is, I stabilized it. I zoomed
[21] in, as close as I could get; and I re-photographed
[22] the film one frame at a time, and repositioned the

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[1] President, so that he was now rock steady in the
[2] center of the image. Now, for the first time, you
[3] could actually see what was happening to him.
[4] The eye didn't have to travel all over the
[5] screen, because by the time you got to where he was
[6] in one frame—by the next frame, he was somewhere
[7] else. This created a situation whereby what
[8] happened in the film—what was captured—the images
[9] that were captured on the film could be viewed and
[10] analyzed for the first time.

[11] The problem was, I was too afraid to say
[12] anything to anybody about it. I mean, when you
[13] looked at the film that way, you could easily see
[14] that the President was struck in the head and
[15] thrown to the rear. I mean, researchers had been
[16] talking about it for years, but here was the proof.
[17] Here was the physical evidence. And at that time,
[18] the Zapruder film had never been seen publicly.

[19] Q: If I can ask you a couple of questions.

[20] A: Okay.

[21] Q: First, what time did you perform the
[22] stabilizing; that is, what year approximately?

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[1] A: It was over quite a period of time. I did
[2] it several different times. But, initially, I
[3] would say probably 1969 or 1970.

[4] Q: Is the term for stabilization either
[5] "rotoscoping" or "Grodenscoping"?

[6] A: Rotoscoping is a different term. What
[7] it—what rotoscoping means, basically, is to match
[8] a position using a source to align.

[9] The term "Grodenscoping" I didn't make up.
[10] I was using the term as—it's a modification of the
[11] rotoscoping technique that I had used. And
[12] somebody in Texas came up with the term
[13] "Grodenscoping", and it sort of stuck. There is no
[14] official term "Grodenscoping", except for what I
[15] did. So, if it's got to be called anything, it may
[16] as well be that, I suppose.

[17] But that stabilization technique—yes, you
[18] could refer to that as Grodenscoping. That's
[19] basically what it is.

[20] Additionally, on some of the copies I
[21] made, I multi-framed it. In other words, since the
[22] film goes by so quickly, it's, again, difficult for

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[1] the mind to perceive what's going on in the film.
[2] So, by double framing it, I slowed it down to half
[3] speed. And, therefore, it's as if the car were
[4] going slower, and the mind can more easily grasp
[5] what's going on. I didn't do that in all the
[6] copies, but I did do it in some.

[7] Q: Is that term also called "step framing"?

[8] A: Yes.

[9] Q: Okay. Approximately how many different
[10] times did you do either a Grodenscope or a
[11] variation on rotoscoping?

[12] A: I don't have the slightest idea, honestly.
[13] I did many different versions of it. I did it of
[14] the President. I did it of Mrs. Kennedy. I did it
[15] of Governor Connally. I did it of people in the
[16] background. There's just many different versions
[17] of it. Again, it was done as an examining type of
[18] exercise.

[19] Q: Was each time that you did either the
[20] rotoscoping or the Grodenscoping on that same
[21] 35 millimeter test positive that you obtained from
[22] Mr. Weitzman?

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[1] A: Yes.

[2] Q: Okay.

[3] A: Okay. In sometime during the early 1970s,
[4] I did get in contact with a few known assassination
[5] researchers, and allowed them to see the work that
[6] I had done. And they were fascinated by it, and
[7] urged me to go public with it. But, again, I was
[8] too afraid to do that. I didn't want to.

[9] Q: Do you remember the names of any of the
[10] researchers whom you showed the film to?

[11] A: Harold Weisberg, Jerry Policoff. There
[12] were others. I'm not really sure which ones.
[13] Eventually, David Lifton, Richard Sprague —

[14] Q: Which Richard Sprague is that?

[15] A: The computer analyst. The
[16] computer—"analyst", I don't think is the right
[17] word. Not the one who was the chief counsel of the
[18] Assassinations Committee.

[19] I'm sure there were others. Members of
[20] the Assassination Information Bureau in Boston,
[21] Robert Katz, Robert—let's see, Robert Salzman,
[22] Harvey Yazigian, and others.

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[1] Finally, in November of 1973, for the
[2] tenth anniversary of the assassination, there was a
[3] symposium held at Georgetown University in
[4] Washington. And I was asked to present the film —

[5] Oh, I actually left something out that
[6] doesn't relate to the Zapruder film. So, I'll get
[7] back, and I'll add that in a minute.

[8] I was asked to present the films—"The
[9] Assassination Films" at that conference. And it
[10] took several people quite a while to convince me to
[11] go ahead and do it, but I did. I did show it
[12] there. There was no press coverage, and it never
[13] went beyond that. Nobody ever reported it. It
[14] just— Nothing happened.

[15] Prior to that point, we had been working
[16] on the movie "Executive Action". And for
[17] "Executive Action" since I had done the work on the
[18] Zapruder film, I was approached and asked to—you
[19] know, if I could do the same sort of thing with the
[20] Nix and Muchmore films.

[21] The producers had licensed the Nix and
[22] Muchmore films from UPI at the time. They couldn't

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[1] use the actual assassination footage, but they
[2] could use the stuff just before and just after.
[3] And they used actors for the actual assassination.

[4] And although I was not involved in the
[5] actual duplicating of the films for the movie, it
[6] was done at EFX Unlimited, which was the company
[7] that I had worked for prior to that point. I had
[8] made the connections for them—gotten UPI and the
[9] producers together with EFX Unlimited, and they
[10] made the copies for the film.

[11] Q: Did EFX Unlimited have access to the
[12] camera-original Nix and Muchmore films?

[13] A: Yes. And there's a footnote to that.
[14] When the films were delivered to them, what they
[15] received was the original Nix film—the color
[16] original Nix film. But the copy of the Muchmore
[17] film that they got was a black and white copy. It
[18] was a duplicate. It wasn't the original.

[19] And they called me about that. And I
[20] said, "No, no. The original film was color. It
[21] was not black and white."

[22] And they went back, and they searched and

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[1] searched and searched, and they finally found it.
[2] And what they found was that the film was in two
[3] pieces. Somebody had physically cut the film at
[4] the frame of the head shot.

[5] What Mr. Weitzman had done at that point,
[6] in order to save the film—to prevent it from
[7] losing frames is, instead of doing a professional
[8] cement splice, which would have cost them at least
[9] two frames, he mylar spliced it — took mylar tape
[10] and spliced it.

[11] The alignment on that particular frame is
[12] not exacting. And because of the cut, there is a
[13] white bar—a space that exists in that frame. But
[14] he was able to save the film without losing the
[15] frames on that.

[16] Q: All right. During the time that the Nix
[17] and Muchmore films were in the custody of EFX
[18] Unlimited, did you, yourself, ever see the original
[19] films?

[20] A: No.

[21] Q: Did you play any role at all in terms of
[22] processing, developing, enlarging, enhancing the

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[1] Nix or Muchmore films while at EFX Unlimited?

[2] A: No.

[3] Q: Who, at EFX Unlimited, was involved in the
[4] photographic work on the Nix and Muchmore films?

[5] A: That, I don't know. I wasn't there. I
[6] was informed that it was going on. I was told that
[7] it was, indeed, happening. But the owners at UPI
[8] apparently were very, very uptight about it. They
[9] had somebody there with it at all times, and
[10] wouldn't leave it. And the— That's what I was
[11] told, anyway.

[12] And I always found it very curious that
[13] they had allowed the Muchmore film to be mutilated
[14] the way it was; that it had been cut. But by now,
[15] they were very protective of it.

[16] Q: Okay.

[17] A: In any case, the same sort of thing
[18] happened—with the Nix and Muchmore happened with
[19] the Zapruder film. You know, mechanic's copies,
[20] test prints were saved. They—you know, they
[21] wouldn't be thrown away. Thank goodness.

[22] Historically, as it turns out—where Nix

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[1] is concerned, particularly—it's extremely
[2] important, because now that WTN—the last people
[3] who had the Nix film have claimed that they've lost
[4] it. The only existing clear copies that
[5] exist—that are known to exist at this point are
[6] the copies that I have—the ones that were—the
[7] mechanic's copies that were given to me.

[8] As a matter of fact, I supplied copies of
[9] those to the Nix family, so they would have copies
[10] of the prints.

[11] Q: Are the copies that you saved, then, first
[12] or second generation of the Nix and Muchmore films?

[13] A: They would be second. Again, the
[14] negatives would be the first generation. And those
[15] were, as I understand, turned over to UPI.

[16] Q: Did you, yourself, ever see the negatives?

[17] A: No.

[18] Q: And that would be, you didn't see the
[19] negatives for either the Muchmore or the Nix film.

[20] A: No.

[21] Q: Is that correct?

[22] A: Never.

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[1] Q: Okay.

[2] A: Okay. Subsequent to my seeing those
[3] 35 millimeter copies, I was allowed access to an
[4] optical printer to do the same rotoscoping type
[5] work on those films as I did on the Zapruder film.

[6] Q: So, your optical printing work, then, was
[7] with a second-generation positive —

[8] A: Yes.

[9] Q: — is that correct?

[10] A: That's correct.

[11] Q: Did you perform the work of Grodenscoping
[12] at EFX Unlimited labs?

[13] A: Yes.

[14] Q: Did you need to obtain the authorization
[15] from anyone at EFX Unlimited to use their
[16] facilities?

[17] A: Yes.

[18] Q: And whom did you get the permission from?

[19] A: From Mr. Weitzman.

[20] Q: Okay.

[21] A: Through the years, other researchers that
[22] had copies of other films relating to the

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[1] assassination had sent me copies to study and work
[2] with, but they were very inferior copies—very
[3] inferior quality duplicates from the originals.
[4] And the results of what I was able to do with those
[5] were extremely unsatisfying. They were very
[6] contrasty, very blurry, very soft focus. And those
[7] were not of any real value.

[8] Additionally, other researchers had
[9] supplied 16 millimeter prints of professional news
[10] footage that was taken around the Dallas area and
[11] all through Texas for all parts of the trip. Many
[12] of those, to this day, remain unidentified. I have
[13] no idea who took them.

[14] I don't even remember who the sources were
[15] for a lot of those. It just— Through the years,
[16] it just— After a while, it was as if I became a
[17] focus for this. Everyone who had stuff would send
[18] copies to me to study. Or if they had a particular
[19] theory about somebody who appeared in one
[20] particular film, they sent it to me to study, and
[21] like that.

[22] Many of those are just copied onto

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[1] videotape, and didn't have film copies of. In some
[2] cases, I did. I'd sent them to a lab and have a
[3] duplicate made. Things of that nature.

[4] And then, also, through the years, there
[5] were a lot of slides and transparencies,
[6] photographs that were made available.

[7] Q: Could you give me some examples of the
[8] slides that were made available?

[9] A: The Willis slides, the—oh, gosh—Bond,
[10] Wilma Bond's slides. And there were other
[11] photographs, too.

[12] One was called the Foley photograph, which
[13] was thought to be taken on November 22nd; but,
[14] apparently, it was actually taken on the 24th.
[15] Foley was not the photographer. Foley was the name
[16] of the owner of the photo lab that found the print.

[17] The Altgens photographs, and many of the
[18] Dallas press photographers, and Life magazine—Art
[19] Rickerby's stuff. Stuff like that.

[20] I, again, don't know all of them. Many of
[21] them have been identified through the years, but if
[22] I— Some of them are so similar—particularly, the

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[1] ones following the actual assassination, where
[2] people are lying on the ground, I couldn't identify
[3] those. If you put them in front of me and offered
[4] me \$100,000 to identify them, I probably couldn't.

[5] And in the beginning of February 1975,
[6] there was a symposium held in Boston. Actually, I
[7] think it was Cambridge. Boston University, I
[8] guess. And it was called The Politics of
[9] Conspiracy.

[10] And by now, my work was known within the
[11] critical community. And they had asked me to
[12] present the films there, and I agreed to do it.
[13] But this time, there was press coverage. All the
[14] networks were covering it as a news story. And
[15] when I showed the films, everybody was
[16] flabbergasted again.

[17] Now we're all used to the Zapruder film
[18] today. But in those days, Life magazine was
[19] sitting on it, and no one had been allowed to see
[20] it. It had never been shown publicly. So, it
[21] became a news story, and it was shown around the
[22] country on different television shows—on news

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[1] shows, rather.

[2] And at the conference, one of the people
[3] in the audience was Dick Gregory, the social
[4] activist and comedian. And he approached me after
[5] the—after my presentation, which involved slides
[6] and films, and said, "You know, you really should
[7] do more with this than just show it here this one
[8] time."

[9] I said, "Well, you know, what can I really
[10] do? I'm just me."

[11] He said, "Well, let's get together and
[12] talk about it."

[13] And he came up with the idea of holding a
[14] press conference—which he decided he wanted to do
[15] in Chicago, of all places, since that's where he's
[16] from and had a good relationship with the press
[17] there—to announce that we were going to bring
[18] these films to the—the films and the photographic
[19] evidence to the Rockefeller Commission as evidence
[20] of conspiracy and possible involvement of the
[21] Central Intelligence Agency. And that was the
[22] vehicle for making the film public.

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[1] We held the press conference, and then the
[2] next day flew and testified before the Rockefeller
[3] Commission—presented the evidence to them, showed
[4] them the films.

[5] While we were there, we were contacted by
[6] Geraldo Rivera—his people. He wanted—he had seen
[7] the news stories, and wanted to show the film and
[8] do a story on it on his show, "Goodnight, America".
[9] And this was—I guess, this was still February of
[10] 1975. And by March of '75, the show was scheduled,
[11] and shot, and ready to air. And I showed the
[12] Zapruder film on national television for the very
[13] first time.

[14] And the public outcry for seeing, you
[15] know, the President when he's struck and thrown to
[16] the rear so violently—everybody wanted to know why
[17] they had not been allowed to see the film before.
[18] All they were able to see is still frames in Life
[19] magazine, and that doesn't have nearly the impact.

[20] As a result of that showing, I was invited
[21] to Washington to show the photographic and filmed
[22] evidence to the Virginia Congressional Delegation,

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[1] which I did. And as a result of that, Congressman
[2] Thomas Downing of Virginia introduced legislation
[3] to reopen the case. He felt that the photographic
[4] evidence had enough in it to justify a
[5] reexamination of the single bullet theory and the
[6] lone assassin theory.

[7] And that's where the House Assassinations
[8] Committee was conceived. You know, that's—
[9] Eventually, it became the Assassinations Committee
[10] some—I guess, about a year and a half later. And
[11] I was named staff photographic consultant to the
[12] Committee.

[13] And, of course, the opinion of the
[14] Committee in their final report was that, to a 95
[15] percent certainty, there was a conspiracy to kill
[16] the President. And that's where it remained.

[17] Of course, in what I call The Empire
[18] Strikes Back, the National Academy of Sciences took
[19] the acoustics evidence and tried to tear it apart,
[20] and reduced the probability from 95 percent to
[21] somewhat less—like 65 percent, or 50, or something
[22] like that—and then just walked away from it.

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[1] And, officially, that's where the case has
[2] remained ever since—with people torn apart. Do
[3] they believe the acoustics evidence, or don't they?
[4] And that's it.

[5] Q: Approximately, how large is your
[6] photographic collection from the materials related
[7] to the assassination?

[8] A: I've been told it's the largest in the
[9] world. Many years ago, I offered the National
[10] Archives the option of making copies of everything.
[11] Back in the '70s, as a matter of fact. And I spoke
[12] to Marion Johnson about it, and he said that they
[13] had no facility for doing it. He said that the
[14] only thing they could accept is stuff that was from
[15] the Warren Commission.

[16] And this was before the HSCA even existed,
[17] you know. But I did offer to make it all available
[18] at that time. I thought it should be in the public
[19] record. I had offered to make the copies for them,
[20] if they wanted.

[21] Q: This may be difficult to actually describe
[22] in quantitative terms; but, if you could, do the

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[1] best that you can to describe what the total volume
[2] is of material that you have related to the
[3] assassination, either in file drawers, or boxes, or
[4] whatever way makes the most sense.

[5] A: There are literally thousands of
[6] photographic images. Many of them duplicates.
[7] Many of them shot years later.

[8] Some are recreations of events that
[9] happened at the time. Many are things that I took
[10] during the filming of Oliver Stone's movie "JFK".

[11] Some are copies from books and magazines.
[12] Some are duplicates of originals that had been
[13] loaned to me, or copies of copies of originals, and
[14] like that.

[15] At this stage, it's virtually impossible
[16] for me to tell what's what. It's very, very
[17] difficult. The majority of the stuff is not
[18] correctly filed.

[19] But one thing that I mentioned to you on
[20] the phone and again before we started this, I don't
[21] have any camera originals from Dealey Plaza—from
[22] the actual assassination. Everything that I have

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[1] is duplicates of other people's stuff.

[2] For instance, the Altgens photograph. I
[3] have copies of all the Altgens photographs, but the
[4] originals exist. Possibly better copies of this.
[5] They made copies of all of those for the House
[6] Assassinations Committees. So, their files contain
[7] the best positive images of those negatives.

[8] In fact, as I recall, I made film
[9] positives for them, as well; so that they wouldn't
[10] be hampered by the film structure—the grain
[11] structure. This was important, specifically, on
[12] the fifth Altgens photograph that shows the man in
[13] the doorway that many people thought was Lee Harvey
[14] Oswald.

[15] They had gone to the most prestigious
[16] photographic outfits in the country—RIT,
[17] Aerospace, I guess, Kodak—Eastman Kodak, all of
[18] them—and they tried to bring out the frame
[19] pattern—the image pattern in the shirt. And they
[20] all failed. They couldn't come up with a
[21] conclusion.

[22] And then they gave the negative to me.

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[1] And what I did is, I tried a totally different
[2] technique. And I went from the negative directly
[3] onto film, which was much finer grain than any of
[4] the papers that were being used by the others, and
[5] came up—using a technique which I developed called
[6] vario-density cynexing.

[7] And using that technique, I was able to
[8] create an image of the shirt much clearer than
[9] anything that was ever done by anyone else before,
[10] and established that I had been wrong for all those
[11] years. That it was not Lee Harvey Oswald in the
[12] doorway; but, rather, it was Billy Lovelady.

[13] So, I had proved myself wrong—which
[14] didn't bother me. If someone was going to prove me
[15] wrong, I'd rather it was me than someone else.

[16] Q: We all feel that way.

[17] A: Well, I'm not so sure that a lot of people
[18] involved in this endeavor do feel that way. A lot
[19] of people become very protective of their personal
[20] theories, and get very defensive about it.

[21] Q: If I could ask one just clarifying
[22] question.

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[1] A: Sure.

[2] A: Did I understand you correctly to say that
[3] the House Select Committee had the original
[4] camera—or the camera-original negatives from the
[5] Altgens films—Altgens slides?

[6] A: Yes. They had the full set of the
[7] originals.

[8] Q: Okay.

[9] A: They had actually gained access to
[10] originals of virtually everything that they wanted.
[11] They had the original Zapruder film—which they
[12] wouldn't let me see or touch, unfortunately.
[13] Although, there was a period in the early 1970s
[14] where I was allowed to examine and handle the
[15] original film at Life magazine's offices.
[16] I was working on a documentary project
[17] that never came to be, and we were bidding on the
[18] film. And they kept jacking the price up. They
[19] started at \$10,000. And then when we finally
[20] raised the money to go to \$10,000, then they raised
[21] it to \$20,000. And then when we agreed to \$20,000,
[22] they went up to \$50,000. And it was just insane.

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[1] We were playing tag with it.

[2] But I was allowed to view and hand-hold
[3] the original film. So, from my memory, what I saw
[4] was without any question a camera original—for
[5] many reasons.

[6] Q: Were you able to make any copies of the
[7] camera original of the Zapruder film?

[8] A: At that time? No.

[9] Q: At that time, or at any other time?

[10] A: No, I have never had—I've never been able
[11] to duplicate the original myself.

[12] It was done for CBS TV in 1975. They had
[13] licensed it from Time, Incorporated. And they made
[14] first-generation duplicates at that time—I
[15] believe, Ektachrome copies. CBS would still have
[16] those, I would think, unless they had to return
[17] them to Jamie Silverberg or to the Zapruder family.

[18] Q: Mr. Silverberg is the Zapruder's lawyer;
[19] is that right?

[20] A: Yes.

[21] Q: In case I forget —

[22] THE WITNESS: I specifically want to

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[1] address you on this. The slides that are in the
[2] National Archives of the Zapruder film—the later
[3] frames are misnumbered. From a specific point,
[4] they're off by one. And I don't know which
[5] direction they go in, but I remember noticing that;
[6] that they are not correct.

[7] MR. MAYN: Okay.

[8] THE WITNESS: I had pointed it out to
[9] Mr. Silverberg a few years ago, but he wasn't—he
[10] didn't have the time to deal with it at the time.

[11] I would also suggest that if the
[12] Committee —

[13] Because I don't want to forget to say
[14] this. It doesn't really, perhaps, belong here; but
[15] I'd like to add it.

[16] Many years ago, I had pleaded with the
[17] Zapruder family and with the Archives to be able to
[18] create a new copy of the Zapruder film from the
[19] original, photographing each frame individually,
[20] including the information between the sprocket
[21] holes. There's an additional 20 percent of image
[22] that only appears on the original, which is on none

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[1] of the duplicates.

[2] And it would—what it would require is
[3] re-photographing each frame outside of a film
[4] shuttle. In other words, it gets masked off by the
[5] film shuttle, and you can't see that image. I
[6] think that, historically, a film should be made.
[7] And it's not a particularly difficult thing to do.
[8] It's very time consuming and meticulous, but it
[9] could be done.

[10] And you would end up being able to see the
[11] actions of Clint Hill prior to the head shot—the
[12] Secret Service follow-up agent—and be able to tell
[13] the velocity of the motorcycles, as well. The
[14] Zapruders have declined access to me to do that for
[15] them and for history.

[16] That film is not in the greatest of shape.
[17] The last time I saw it, it had mold growing on it.
[18] It has not been cared for correctly prior to the
[19] Archives getting it. And there are torn frames.
[20] There are at least two splices in the film.

[21] And what I would recommend is doing this
[22] project that I had requested—I guess, almost 15,

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[1] 16 years ago—before it's too late, while there's
[2] still a useable image on the film.

[3] BY MR. GUNN:

[4] Q: If we could go back to the collection that
[5] you have, do you keep your photographs or images
[6] in— Well, let me try it a different way.

[7] Where do you keep your photographs and
[8] images?

[9] A: I, basically, keep them in file folders
[10] and filing cabinets in the house. The problem is,
[11] though, that I've taken so many of them out for use
[12] in the books that I've published and have not had
[13] the time to refile them. They're all—it's pretty
[14] much of a hodgepodge now. They're actually in
[15] boxes. And it would probably take months for me to
[16] refile them.

[17] Q: Do you have any kind of cataloging or
[18] index system for your Kennedy assassination images?

[19] A: No. I wish I did. I don't.

[20] Q: Do you now store your images in any place
[21] other than your home in Boothwyn, Pennsylvania?

[22] A: No.

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[1] Q: Have you ever entrusted your images to
[2] another person to keep for you?

[3] A: No. Well, not that I can recall. I think
[4] I have lent specific images over the years to other
[5] people. I've usually gotten them back. I am very
[6] nervous about this.

[7] As a matter of fact, I have approached the
[8] Sixth Floor in Dallas with the possibility of their
[9] buying my entire collection, because I think that
[10] they could probably deal with it better than I
[11] could, as far as historically preserving them and
[12] like that. And, besides, right now I need the
[13] money a great deal more than I need the
[14] photographic images.

[15] Q: When did you approach the Sixth Floor
[16] Museum?

[17] A: Originally? I guess, about six months
[18] ago. I have not gotten an answer from them, but I
[19] spoke with them again just this week. I guess, it
[20] was yesterday—or maybe it was Friday. And they're
[21] not particularly interested. They do not appear to
[22] be particularly interested in it—which surprised

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[1] me, frankly.

[2] Q: Have you ever stored any images related to
[3] the Kennedy assassination at any laboratories or
[4] commercial storage facilities?

[5] A: Videotape copies, yes. But not the
[6] original films.

[7] Q: Do you keep the original films that you
[8] have in any kind of special storage facilities,
[9] some form of cooler or temperature-controlled
[10] environment?

[11] A: Unfortunately, no. Relatively, yes. In
[12] other words, they're in the house; and the house is
[13] kept at a relative comfortable living situation.
[14] They should be stored cooler than I have the
[15] capability of doing it. And they should be
[16] humidity controlled, as well. This is one of the
[17] reasons why I was interested in preserving them
[18] with the Sixth Floor people.

[19] Q: Mr. Groden, at this time, I'd like to show
[20] you copies of a couple of documents, and ask you
[21] whether you have seen these before. Have you seen
[22] a copy of the document before?

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[1] MR. GUNN: I'll state for the record that
[2] the first document appears on its face to be a
[3] Subpoena Duces Tecum for the production of
[4] documents and appearance for testimony before the
[5] Assassination Records Review Board, Robert Groden.

[6] THE WITNESS: This appears to be a copy of
[7] the subpoena that you sent to me, yes.

[8] MR. GUNN: Okay. I'd like to ask the
[9] reporter to mark that as Exhibit 1.

[10] [Deposition Exhibit No. 1
[11] marked for identification.]

[12] MR. GUNN: Mr. Groden, I'd like to hand
[13] you a second document, and ask you whether you have
[14] previously seen that document before?

[15] And I'll state for the record it appears
[16] on its face to be a letter signed by me to Mr.
[17] Robert Groden, dated June 26th, 1996.

[18] THE WITNESS: Yes. You faxed me a
[19] copy—probably. Yes, I would say this sure seems
[20] to be what you faxed to me.

[21] MR. GUNN: That will be marked Exhibit 2,
[22] please.

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[1] [Deposition Exhibit No. 2
[2] marked for identification.]
[3] BY MR. GUNN:
[4] Q: Do you understand that you are here today
[5] pursuant to the subpoena as issued and as recorded
[6] on Exhibit 1—as well as 2, the letter now marked
[7] Exhibit 2?
[8] A: Yes, I believe so.
[9] Q: I'd like you to take Exhibit 1, if you
[10] would, please, and turn to the second page of
[11] Attachment A, which is entitled Documents and
[12] Photographs. Do you see that before you?
[13] A: That would be the third page; right?
[14] Q: Third page of the document, yes —
[15] A: Yes.
[16] Q: — the second page of the attachment.
[17] Mr. Groden, did you bring any materials
[18] with you today pursuant to Exhibit 1 of the
[19] deposition?
[20] A: Yes.
[21] Q: Could you show me the materials that you
[22] brought with you today?

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[1] A: Yes.
[2] Q: Mr. Groden, I notice that you've put some
[3] canned—apparently, film containers on the table.
[4] Are the containers that you put on the table all of
[5] the documents, or records, or images that you
[6] brought pursuant to the subpoena.
[7] A: Yes. They're not original films shot in
[8] Dealey Plaza—not original films, but copies of the
[9] films that were originally shot in Dealey Plaza.
[10] Q: With the assistance of Mr. Mayn, I'd like
[11] us to go through the films one at a time, so that
[12] we can make a record of what the films are; the
[13] condition; the format of the film —
[14] A: Okay. I actually prepared a list for you.
[15] Q: Thank you.
[16] MR. GUNN: If I could, I'll ask the
[17] reporter to mark this as Exhibit 3.
[18] [Deposition Exhibit No. 3
[19] marked for identification.]
[20] MR. GUNN: We can go off the record for a
[21] moment.
[22] [Discussion off the record.]

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[1] THE WITNESS: First is a reel—from its
[2] length, I would say probably several takes—of the
[3] Zapruder film. And there appears to be one splice
[4] in it.
[5] BY MR. GUNN:
[6] Q: Does that correspond to number one on
[7] Exhibit 3?
[8] A: Yes, it does. It is a Ektachrome copy of
[9] the original Zapruder film.
[10] Q: And is that 16 millimeter?
[11] A: Yes, it is.
[12] Q: Are there any identifying marks on the
[13] tape that would specifically identify it as being
[14] your film; that is, something in your handwriting
[15] or any identifying number or date?
[16] A: There— I had written in print the words
[17] "Zapruder first-generation Ektachrome projection
[18] print". And from the nature of this, it was
[19] probably written on there many years ago.
[20] Q: Could you estimate approximately when you
[21] prepared the film that's marked as the first entry
[22] on Exhibit 3?

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[1] A: No. I have no idea. I would say probably
[2] late 1960s.
[3] Q: Would it be fair to say that the film was
[4] created prior to the time of the House Select
[5] Committee on Assassinations?
[6] A: Oh, yes.
[7] Q: And when you called it "first-generation
[8] Ektachrome", what did you mean by "first
[9] generation"?
[10] A: It is made directly from the 35 millimeter
[11] print that I was allowed access to.
[12] Q: And, as I believe you stated before, the
[13] print was actually itself a second-generation copy;
[14] is that correct?
[15] A: That is correct. Which would make this a
[16] third-generation copy.
[17] Q: Okay. Could we go to the next film,
[18] please?
[19] A: Okay. The next one is an Ektachrome
[20] master copy, first generation— Well, I have to
[21] give a background on this.
[22] When the Zapruder film was originally

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[1] shot, Dallas the afternoon of the assassination,
[2] three additional prints were made. The original
[3] Zapruder film was mutilated by Life magazine,
[4] either by accident or on purpose. There were two
[5] splices put in it. One in the 150s—going by the
[6] frame numbers—and one at frame 207.

[7] The original three copies remained intact
[8] until approximately 1967, when Life magazine
[9] purposely mutilated their intact copy for the
[10] purpose of creating an item for the Clay Shaw trial
[11] in New Orleans. The original film— Not the
[12] original film. A copy of the film, I believe, was
[13] subpoenaed by Jim Garrison.

[14] And what Life had done is, they took a
[15] poor quality, eight millimeter copy—took their
[16] existing duplicate—Dallas duplicate, cut it up,
[17] mylar spliced frames from the Dallas duplicate into
[18] their further-generation copy, and then had it all
[19] duplicated again. And that's what they sent to
[20] New Orleans.

[21] What this is—what this particular —

[22] Q: When you say "this", you're referring to

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[1] item number two on Exhibit 3?

[2] A: Yes. This is a copy of the Secret Service
[3] copy of the film. In other words, this is one of
[4] the surviving two intact copies that has the frames
[5] that are missing from the original film.

[6] Q: Okay. So, if I can try to recreate the
[7] provenance of the film, there is the original—the
[8] camera-original Zapruder film. From the camera-original
[9] film, there was a first-generation copy
[10] made. There were three prints, total.

[11] Now, is the film that you're holding in
[12] your hand—number two on Exhibit 3—one of those
[13] Secret—or one of those first-generation prints; or
[14] is this a copy from that first-generation print?

[15] A: This is a copy of one of those prints.
[16] Those prints were all eight millimeter. This copy
[17] is 16 millimeter.

[18] Q: Okay. So, the film that you're holding in
[19] your hand—again, number two on Exhibit 3—is then
[20] itself a third-generation copy; is that correct?

[21] A: This is correct.

[22] Q: Where did you obtain the film in your hand

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[1] now?

[2] A: These copies were made when I was with the
[3] House Assassinations Committee. They had lent me
[4] the original film, and they had me make several
[5] copies.

[6] Q: When you say "the original film", you're
[7] referring to the first print that was made from the
[8] camera-original Zapruder film; correct?

[9] A: That is correct.

[10] May I interject, too? The term

[11] "generation" is, in fact, open to debate.

[12] Some people consider the camera original
[13] to be the first generation. In fact, by

[14] definition, "generation" would mean that the first-
[15] generation duplicate would be a first generation.
[16] The first copy would be the first generation.

[17] If that's the case, then, what I have here
[18] is a second-generation print.

[19] Q: Okay. Either terminology is fine, but I
[20] think it would be useful for us to be consistent
[21] with that.

[22] A: Okay.

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[1] Q: So, we will say, then, that that is a
[2] second-generation print made from a first-generation print,
[3] which was made from the camera
[4] original.

[5] A: That would be the most accurate way of
[6] doing it.

[7] Q: Could you identify the next film?

[8] A: Next is number three. That's a 35
[9] millimeter color print of the Nix film. It came to
[10] me via Mo Weitzman at EFX Unlimited. To my
[11] knowledge, this is the only surviving copy of the
[12] film made directly from the original, although this
[13] is a print. The negative, which must exist
[14] somewhere, is a generation closer to the original
[15] than this.

[16] Q: So, if I'm clear, is the film that you're
[17] holding in your hand now a copy made from the
[18] negative, or is it a copy made from the camera
[19] original?

[20] A: This is a copy from the negative, which
[21] was made from the camera original. So this, again,
[22] would be a second-generation item.

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[1] Q: Where did you obtain the film in your hand
[2] now that— Actually, let me withdraw that.
[3] I assume that the film that you're
[4] discussing now would be item number three on
[5] Exhibit 3; is that correct?
[6] A: This is correct.
[7] Q: Where did you obtain item three?
[8] A: This was given to me by Mo Weitzman.
[9] Q: Approximately, when was it given to you by
[10] Mo Weitzman?
[11] A: I think, sometime during 1973. It had to
[12] be before November of '73, because I did show it at
[13] Georgetown University at that tenth anniversary
[14] symposium I told you about before.
[15] Q: Are there any identifying marks or words
[16] that would help —
[17] A: I don't believe so. I wrote "Nix print"
[18] on the tape that's on that, but I wrote that on
[19] just a couple days ago. I don't— As far as I
[20] know, there aren't any—
[21] No. No, there's nothing written on the
[22] leader at all.

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[1] Q: Could you go to the next film, please?
[2] A: The next is the Muchmore film, a film
[3] taken by Marie Muchmore. That also is a color
[4] print. And the generation here would be identical
[5] to that of the Nix film.
[6] Q: That is to say that the copy which you
[7] are—which is in your hands now was taken from the
[8] negative that was, in turn, taken from the camera
[9] original?
[10] A: This is correct.
[11] Q: Where did you obtain the Muchmore film?
[12] A: The same situation as the Nix film. From
[13] Mr. Weitzman.
[14] Q: And just so the record is clear, you're
[15] now referring to number four on Exhibit 3; is that
[16] correct?
[17] A: That is correct.
[18] Q: Are there any identifying marks on the
[19] tape?
[20] A: Nothing on the tape. As a matter of fact,
[21] I wish I had a longer piece of tape. This one is a
[22] little old. But the leader itself says "Groden,

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[1] Muchmore 35 color print".
[2] Q: Approximately, when did you obtain this
[3] from Mr. Weitzman?
[4] A: Probably the same day as the Nix film.
[5] Q: Could you turn to the next film you
[6] brought today?
[7] A: Okay. Can I put these back into their
[8] correct containers?
[9] Q: Sure.
[10] A: I appreciate that.
[11] MR. MAYN: I think we're clear on relating
[12] these pieces to the list, particularly the first
[13] two. They're both 16 Ektachromes. . .
[14] THE WITNESS: Right. Well, this one says
[15] "Secret Service".
[16] MR. MAYN: Okay.
[17] THE WITNESS: And that's the intact one.
[18] MR. MAYN: Intact—just to be sure that we
[19] can relate the pieces to your list.
[20] THE WITNESS: Okay.
[21] MR. GUNN: We can go off the record for a
[22] minute.

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[1] [Discussion off the record.]
[2] BY MR. GUNN:
[3] Q: Mr. Groden, what is the next film that you
[4] brought with you today?
[5] A: The next one is the Bell film—something
[6] that I marked "Bell". And this is a 35 millimeter
[7] color print, also.
[8] Q: What generation copy is the Bell film?
[9] A: The Bell film would be the same generation
[10] as— Actually, let me think. You have the camera
[11] original. It would be second generation.
[12] Q: Where did you obtain the Bell film?
[13] A: I'm not sure where this one came from,
[14] because I've had the original—well, I've had
[15] sources in my hands several times. This one may
[16] well have come through the House Assassinations
[17] Committee.
[18] Q: When you say that you've had "sources" in
[19] your hands many times, what do you mean by that?
[20] A: I had copies of the Bell film prior to the
[21] House Committee, but I didn't have the original to
[22] work with. When I was working for the House

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[1] Committee, I had the original film. And I do
[2] believe that that's where this one came from.
[3] The one— It says "very good color print".
[4] The copies that were made prior to that point were
[5] very bad quality. So, I'm convinced that this did
[6] come from the House Committee.

[7] Q: When you say you had the original film to
[8] work with for the Bell film, did you mean the
[9] camera original or a first-generation negative?

[10] A: The camera original.

[11] Q: Do you know where the camera original to
[12] the Bell film is now?

[13] A: I assume that the House Committee returned
[14] it to Mark Bell.

[15] Q: So the record is clear, the film that
[16] we're referring to now is from Exhibit 3, number
[17] five; is that correct?

[18] A: That is correct.

[19] Q: And is the color print a color positive?

[20] A: Yes. "Print" means positive.

[21] The House Committee had the negative. The
[22] negative was turned over to them with their

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[1] prints—print or prints. I don't remember how many
[2] were made for them.

[3] Q: Do you know where the negative is now?

[4] A: I assume, it's in the National Archives.
[5] You'd know better than I do.

[6] BY MR. GUNN:

[7] Q: Could you bring out the next film marked
[8] on Exhibit 3, please?

[9] A: Yes. The next one is the Hughes film, and
[10] the Hughes film is also a 35 millimeter color
[11] print.

[12] Q: Where did you obtain the Hughes film?

[13] A: Also, from the HSCA. I also had previous
[14] copies prior to that. This one has got to be from
[15] the HSCA, because as with the Bell film, the
[16] quality of those original prints was really
[17] terrible. And this is very good.

[18] Q: Was the Bell film—the one that you
[19] brought with you today—taken directly from the
[20] camera original, or was there an intermediary
[21] negative?

[22] A: There is an intermediary negative.

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[1] Q: Do you know where the negative is today?

[2] A: Again, I assume it's at the National
[3] Archives. It was turned over to the House
[4] Committee.

[5] Q: Could you describe the next film you
[6] brought with you today, please?

[7] A: That would be the Towner film, a film
[8] taken by Tina Towner.

[9] Q: Is that number seven on Exhibit 3?

[10] A: Yes, it is. And this is a 16 millimeter
[11] color print.

[12] Q: Where did you obtain the Tina Towner film?

[13] A: Through the House Committee—the House
[14] Assassinations Committee.

[15] Q: Did you have access to the original?

[16] A: Yes.

[17] Q: Is the print that you brought with you
[18] today taken directly from a first-generation
[19] negative?

[20] A: Yes, it is.

[21] Q: Do you know where the first-generation
[22] negative is?

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[1] A: I assume the House Assassinations
[2] Committee put it in the Archives.

[3] Q: Do you know where the original Tina Towner
[4] film is?

[5] A: I assume that was returned to Tina Towner.

[6] Q: Have you ever had in your possession
[7] either—in your personal possession either the Tina
[8] Towner original film or the Tina Towner first-generation
[9] negative?

[10] A: I had both.

[11] Q: When you say you had both, do you mean
[12] during the time at the HSCA?

[13] A: Yes.

[14] Q: Did you ever personally own them or have
[15] them in your own possession, as opposed to in the
[16] custody of the HSCA?

[17] A: Well, you said, did I ever have them in my
[18] possession? Well, I didn't own them, but the
[19] Committee gave them to me to make copies of. And,
[20] so, for a period of a few days, I had the original.
[21] And then when the negative was made, I had
[22] possession of that when I brought it back to the

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[1] Committee. And when I turned them over, I turned
[2] them over to them at the same.
[3] Q: Okay. What is the next film that you
[4] brought with you today?
[5] A: The next one is the Bronson film.
[6] Q: Could you describe that briefly, please?
[7] A: This is a 16 millimeter Ektachrome color
[8] print—I mean, not color print—just color copy.
[9] Q: What is the difference between a color
[10] print and a color copy?
[11] A: Well, a print is made from a negative.
[12] Since this is an Ektachrome, which is reversal
[13] film, there is no negative involved.
[14] Q: Where did you obtain the Bronson film?
[15] A: From Mr. Bronson himself.
[16] Q: When did you obtain the original from
[17] Mr. Bronson?
[18] A: I believe it was toward the end of 1978.
[19] Q: How long did you have access to the camera
[20] original Bronson film?
[21] A: I don't remember exactly. My gut feeling
[22] is probably a few weeks.

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[1] Q: Where did you have access to that?
[2] A: It was sent to my house in New Jersey.
[3] Q: Do you have photo lab equipment at your
[4] house in New Jersey?
[5] A: Yes. That's not where I did the work on
[6] the film. The film was done, again, at EFX
[7] Unlimited in New York.
[8] Q: And that work was done approximately 1978?
[9] A: Yes.
[10] Q: What is the next film that you brought
[11] with you today?
[12] A: The next one is the last one. And it's
[13] the Dorman film, a film taken by Elsie Dorman.
[14] Q: Would you describe the Dorman film,
[15] please?
[16] A: Thirty-five millimeter color print.
[17] Q: Where did you obtain the Dorman film?
[18] A: From the HSCA.
[19] Q: Did you have access to the camera-original
[20] Dorman film while you were at the HSCA?
[21] A: Yes.
[22] Q: Did you have access to a first-generation

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[1] negative of the Dorman film at the HSCA?
[2] A: I made it for them.
[3] Q: Do you know where the original—camera-original
[4] Dorman film is now?
[5] A: I assume the House Committee sent it back
[6] to Ms. Dorman.
[7] Q: Do you know where the first-generation
[8] negative of the Dorman film is?
[9] A: I would assume it's in the National
[10] Archives. Everything that I made for the
[11] Committee—all of these items, whether they were
[12] still photographs or whether they were films, were
[13] all turned over to Jane Downey at the House
[14] Committee and/or Michael Goldsmith. As I
[15] recall—and I'm certainly not clear on it—I would
[16] say, most probably Jane Downey.
[17] Q: Other than Mr. Goldsmith and Ms. Downey,
[18] was there any other person at the HSCA from whom
[19] you obtained photographic materials for your work?
[20] A: As I recall, no. We're going back to the
[21] mid and late 1970s, so I can't be 100 percent sure
[22] that there wasn't anybody else. But as I recall,

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[1] everything went through them.
[2] Q: Did anyone at the HSCA give you permission
[3] to make a copy of any of the films for your own
[4] personal use?
[5] A: I had permission to make copies of all of
[6] them, yes.
[7] Q: Who gave you the permission?
[8] A: As I recall, it was both Mr. Goldsmith,
[9] Jane Downey. And I believe that they cleared it
[10] with Professor Blakey. Professor Blakey certainly
[11] knew, because he had me make copies for him, as
[12] well.
[13] Q: For his personal possession?
[14] A: Yeah. And the copies that he had were
[15] ruined or destroyed through the years. He came
[16] back to me years later and asked me to make
[17] additional copies for him from mine.
[18] Q: Approximately, when did he come back to
[19] you to make additional copies?
[20] A: I don't remember. I believe, I was still
[21] living in New Jersey at the time. It would have
[22] been about 10 years ago—10, 11 years ago.

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[1] Q: So, very roughly, in the mid 1980s; is
[2] that fair?
[3] A: Approximately.
[4] Q: Did you make additional copies for
[5] Mr. Blakey at that time?
[6] A: Yes. Specifically at that time, I
[7] remember it was a Secret Service copy. He was
[8] trying to do something with a Secret Service copy
[9] of the Zapruder film. And the lab they had sent it
[10] to had destroyed it—had torn it apart or
[11] something.
[12] Q: Do you know of any other person affiliated
[13] with the HSCA who kept copies of photographic
[14] images in their personal possession, other than
[15] yourself and Mr. Blakey?
[16] A: I would have no knowledge. Nobody told
[17] me.
[18] Q: When you made the copies for Mr. Blakey in
[19] the mid 1980s, did you make them from the films
[20] that you brought with you to this deposition today?
[21] A: To the best of my knowledge, yes. I feel
[22] sure that the— The one I remember making

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[1] specifically— It may have been the only one, or
[2] there may have been more.
[3] The one I remember specifically was the
[4] Secret Service copy of the Zapruder film. And this
[5] is the master. This is the one that was made
[6] directly from the Secret Service copy. So, this is
[7] the one I would have used for Professor Blakey,
[8] yeah.
[9] Q: When you say "this", you're pointing to
[10] number two —
[11] A: Number two.
[12] Q: — of Exhibit 3; is that correct?
[13] A: Yes.
[14] Q: Mr. Groden, in addition to the films that
[15] we have just itemized, did you bring any other
[16] materials with you today pursuant to the subpoena
[17] which has been marked as Exhibit 1?
[18] A: No. Based on our discussion on the phone
[19] the other day, you said that you were interested in
[20] items that were shot in Dealey Plaza and as close
[21] to the originals as possible. And these are the
[22] films that exist from the plaza.

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[1] Anything else would be professional motion
[2] pictures that were shot by news cameramen or people
[3] of that nature. And those were multi-generations
[4] away from the original.
[5] Q: Could you describe for me—and I'll
[6] specify this as we go along—other films that you
[7] had that you did not bring with you today to the
[8] deposition? Let's maybe go through the list that
[9] I've handed to you.
[10] A: Oh, okay.
[11] MR. GUNN: Which I'll ask the reporter to
[12] mark as Exhibit 4 to the deposition.
[13] THE WITNESS: The original?
[14] BY MR. GUNN:
[15] Q: The original. It contains yellow
[16] highlightings. And then you can just continue to
[17] refer to it.
[18] [Deposition Exhibit No. 4
[19] marked for identification.]
[20] BY MR. GUNN:
[21] Q: The first one that you see there is the
[22] Abraham Zapruder film. Now, you brought two —

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[1] A: That is correct.
[2] Q: — two with you. Do you have any other
[3] early-generation copies or negatives of the
[4] Zapruder film?
[5] A: I don't have any early-generation
[6] negatives at all. And to the best of my knowledge,
[7] this is the closest to the original that I've got.
[8] The Secret Service copy—again, which is the intact
[9] copy—I know for a fact, this is the youngest
[10] generation I've ever had.
[11] Q: Could you turn to number two?
[12] A: That's the Nix film. And what I've got
[13] here is my only existing —
[14] Q: I'm sorry. Number two on the list,
[15] Exhibit 4.
[16] A: Oh, I thought just the ones that were
[17] highlighted.
[18] Q: No, I'd like to go through all of them.
[19] A: Oh, okay.
[20] Q: From number two, autopsy photographs, what
[21] is the earliest generation original source you have
[22] for autopsy photographs?

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[1] A: Fifth. Fifth generation. Maybe more. At
[2] least fifth, maybe sixth or seventh.
[3] Q: And you have those in your house in
[4] Boothwyn, Pennsylvania?
[5] A: Yes.
[6] Q: Now, in my reading of the subpoena, the
[7] autopsy photographs were called for.
[8] A: They were initially called for, but they
[9] weren't mentioned in the—in our conversation the
[10] other day.
[11] Q: As I mentioned to you in the conversation,
[12] as recorded in the letter, the limitations on the
[13] scope of the subpoena are only those that are
[14] explicitly recorded in Exhibit 2. And from my own
[15] personal recollection, I explicitly stated during
[16] the conversation that I did want autopsy
[17] photographs.
[18] But the point is not who said what, or
[19] whether there's a misunderstanding. The point
[20] would be that we do want your earliest generation
[21] and any early-generation autopsy photographs.
[22] During our discussion, you also said that

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[1] you would be able to go home if there was any
[2] question about this.
[3] A: Yeah, sure.
[4] Q: And, so, I would like to make arrangements
[5] to collect the autopsy photographs, as well.
[6] The next issue—the next one is autopsy
[7] transparencies. Do you have any autopsy
[8] transparencies?
[9] A: I have some transparencies that were made
[10] for study from the photographs. The photographs
[11] themselves are younger. They're closer to the
[12] original.
[13] Any slides that I would have, any
[14] transparencies would be probably—well, if the
[15] copies are fifth generation, then, they would be
[16] sixth generation. If they're seventh generation,
[17] then, these would be eighth.
[18] Q: Do you have any copies of the autopsy
[19] X-rays from before?
[20] A: Only the ones that were published in the
[21] volumes—the House Committee volumes. I made
[22] slides and photographs from the printed page.

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[1] Q: Did you make any film-to-film copies of
[2] the autopsy X-rays while you worked at the House
[3] Select Committee on Assassinations?
[4] A: No. And I made no copies of the original
[5] photographs, either.
[6] Actually, that's not true. I did. But
[7] they were always in the possession of the
[8] Committee, and they're in the National Archives.
[9] They were done at the—at a lab in Maryland.
[10] Q: If you would, go down to the next one on
[11] the list that we haven't discussed, which is number
[12] six, the William Allen black and white photos. Do
[13] you have any originals or early-generation copies
[14] of the William Allen photos?
[15] A: The William Allen photos were photographs
[16] of the tramps being arrested. Those were—there
[17] were two or three of them, as I recall. I don't
[18] know how early mine are. Several of them were
[19] copied from books.
[20] Q: Do you have any photographs or images from
[21] the William Allen that are earlier generations than
[22] any that you might have photocopied—or copied from

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[1] books?
[2] A: I don't know. I honestly don't know. As
[3] I recall, there's a total of seven photographs of
[4] the tramps. And I don't know which were taken by
[5] who. It was George Smith, William Allen, and Jack
[6] Beers. And I'm not sure who took which.
[7] Q: When you go back to your house, in
[8] addition to obtaining the early autopsy
[9] photographs, I would also like you to bring any of
[10] the tramp photographs that you have, to the extent
[11] you have any generation earlier than one that you
[12] might have taken from a published source.
[13] A: Okay, let me write these down.
[14] Q: Why don't you take a list, if you would.
[15] That would be helpful for you.
[16] A: Okay.
[17] Q: The next one on the list is James Altgens.
[18] What is your earliest-generation Altgens
[19] photograph?
[20] A: The House Committee had first
[21] generation—had the original negatives, the camera
[22] negatives. And I made film positives and prints of

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[1] all of those then for the Committee and for myself.
[2] Q: Then you have both first and second
[3] generations of the Altgens photographs; is that
[4] correct?
[5] A: I probably have second. The majority that
[6] I've got, I would think, would be first-generation—either
[7] film positives or photographs
[8] would both be from first-generation positives.
[9] Q: Okay. We'd like you to bring those with
[10] you, as well.
[11] A: May I ask a question?
[12] Q: Sure.
[13] A: If the first-generation copies I made for
[14] the Committee are in the Archives, why would you
[15] need my copies?
[16] Q: We would just like to examine them.
[17] A: Oh, okay.
[18] BY MR. GUNN:
[19] Q: Look at the next one on the list, please,
[20] the Thomas Alyea film. What is the earliest
[21] generation copy that you have of the Alyea film?
[22] A: I don't know. I had a multi-generation

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[1] copy, which was rather contrasty. And I don't have
[2] any idea what the source was. It was much later
[3] than the original.
[4] Q: Have you ever had access to an earlier
[5] source?
[6] A: Not that I'm aware of. I've seen—I have
[7] seen Alyea footage—earlier prints that I did not
[8] have access to, which had footage that I had never
[9] seen before. But it was definitely his film.
[10] Q: Okay. We'd like you to bring that—your
[11] earliest generation of the Alyea film, as well.
[12] Have you ever seen the original Alyea film?
[13] A: The camera original?
[14] Q: Camera original.
[15] A: Not that I'm aware of, no.
[16] Q: For Jack Beers, do you have any early-generation
[17] copies?
[18] A: You mean of the tramp photographs?
[19] Q: Yes.
[20] A: Because he took hundreds of photographs
[21] that day.
[22] Q: Of the tramp photographs.

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[1] A: No. As far as I know, the House Committee
[2] didn't have the originals. The only copies I've
[3] got of the Beers photographs came from books.
[4] Q: If the only copies that you have of the
[5] Beers photographs are from books, you do not need
[6] to bring those with you.
[7] A: Okay.
[8] Q: The next one is the Hugh Betzner. Do you
[9] have any early-generation copies of the Hugh
[10] Betzner photos?
[11] A: Yes.
[12] Q: What do you have?
[13] A: I have prints that were made off of the
[14] originals. I believe, they were the originals—or
[15] they could have been from second-generation
[16] negatives from prints.
[17] Q: Where did you obtain them?
[18] A: I don't recall, to be honest with you. It
[19] could have been the HSCA.
[20] Q: We would like you to bring those with you.
[21] The next one, Wilma Bond photos. What is
[22] the earliest generation you have of Wilma Bond?

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[1] A: They were copy slides from copy
[2] slides—that may have been from copy slides. So,
[3] what I've got is either— They weren't the
[4] originals. So, it would be second, third, or
[5] fourth generation.
[6] Q: Where did you obtain your copies of the
[7] Wilma Bond photos?
[8] A: From researchers through the years. I
[9] have no idea. I can't remember which is which.
[10] I've gotten copies from other people. Yeah, that
[11] looks like that.
[12] Q: We would like you to bring the earliest-generation
[13] Wilma Bond photos that you have. Do you
[14] know whether the HSCA had access to the originals?
[15] A: I don't think so. I don't know. They
[16] probably could have. It's possible they did.
[17] Q: Other than the Zapruder camera original
[18] which you mentioned earlier, were there any other
[19] photographic materials available to the House
[20] Select Committee to which you did not have access?
[21] A: Did not have access to Zapruder, Nix, or
[22] Muchmore originals. I had requested, specifically,

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[1] the Nix film. And they told me they had already
[2] returned it to WTN, or UPI, or whoever it was they
[3] had gotten it from; and it was no longer available.

[4] Q: Other than those three films, were you
[5] permitted access to all of the photographic
[6] materials available to the HSCA?

[7] A: I don't think so. I know, for one, I was
[8] not given access to the Croft photograph. I was
[9] not given access to the —

[10] When we say "access", do you mean viewing
[11] them or duplicating them?

[12] Q: Viewing them.

[13] A: I don't know. I don't know all that
[14] existed. I know that they published lots and lots
[15] of photographs that I never got to see.

[16] Q: If you could go to the next one on the
[17] list, Richard Bothun.

[18] A: I don't know what the Bothun photos are.
[19] I know they were taken after the assassination.
[20] But if I've got them, they're not identified as
[21] his. That's the sort of photograph I was talking
[22] about, where there's tons of them taken afterward.

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[1] And I don't know which is which.

[2] Q: Okay.

[3] A: If I've got that, it's probably from a
[4] book.

[5] Q: Okay. We won't ask you to bring anything
[6] from Richard Bothun.

[7] A: Okay.

[8] Q: On the next one, the name appears two
[9] different ways that I have seen. One is Harry
[10] Cablack, and one is Tom Cablack—I believe.

[11] A: There were two Cabluks. They were
[12] brothers. And the name is misspelled. As I
[13] recall, it's C-a-b-l-u-c-k. I could be wrong about
[14] that, but I'm pretty sure that's what it was. And
[15] it's written as b-l-a-c-k.

[16] Q: Do you have any early-generation copies of
[17] the Harry Cabluck photos?

[18] A: I don't think so. I don't think I do.

[19] The— Again, you know, they all look very much
[20] alike, that whole series.

[21] Q: Okay. We won't ask you to bring any Harry
[22] Cabluck photos.

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[1] Do you have any photos of Frank

[2] Cancellare?

[3] A: As far as I know, there was only one
[4] Cancellare photograph. That's not it. That's it.

[5] I have later-generation slides of copies
[6] of copies. I don't have anything off of an
[7] original. As I understand, the original was a
[8] square format photograph.

[9] And although I did ask, as I recall, the
[10] Committee for that, I don't think they—I don't
[11] know whether they ever had it or not. But I don't
[12] think I was ever granted access to it.

[13] Other than that photograph, I don't know
[14] if that's complete or not. That does appear to be
[15] the entire photograph. There's nothing missing
[16] from that that I've ever noticed before. And
[17] that's much clearer than any copy I've ever seen.

[18] MR. GUNN: So that the record is clear,
[19] Mr. Groden is looking at a photocopy of the
[20] Cancellare photograph that I brought with me today.

[21] BY MR. GUNN:

[22] Q: The next one, Malcolm Couch. What is the

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[1] earliest generation copy you have of Malcolm Couch?

[2] A: It is a copy from a videotape, multi-generation,
[3] from some release print I got sometime
[4] back during the 1970s. And it's on videotape.

[5] And, unfortunately, my best copy is on a
[6] tape that's falling apart. The oxides are falling
[7] off of it, and do not have anything really
[8] worthwhile. The copy I used in my videotape
[9] production was really substandard. I had no
[10] choice. I couldn't get a copy of the original.

[11] But, as I recall, it's ABC. If you need
[12] an original of that, you might be able to find it
[13] at the Grinberg Library in New York.

[14] Q: We would like you to bring the earliest
[15] generation that you have.

[16] A: Of the Couch film?

[17] Q: Malcolm Couch, yes.

[18] A: It's on a U-matic tape, and I don't know
[19] where it is. The U-matic tape is literally falling
[20] apart. If you try to play it, you'd probably
[21] damage the machine. I had to run it something like
[22] 20-odd times. And every time I tried to run it, it

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[1] clogged the heads. It's not really viewable.
[2] Q: But it was from that tape that you made a
[3] subsequent videotape?
[4] A: Yeah, but it's much clearer on the
[5] duplicate tape than it is on that. It would be
[6] much safer.
[7] Q: How could it be clearer on the duplicate
[8] tape than on the original?
[9] A: Because when you try to run it on the
[10] original, it clogs the heads. It's falling apart.
[11] It's—
[12] There was a series of tapes, as it was
[13] explained to me, that the formulation of the
[14] coating was defective. And when I made a copy from
[15] a borrowed print back in the 1970s, it was on one
[16] of those defective tapes.
[17] Now, the tapes are not logged, so I don't
[18] know which tape it would be on. And if I try to
[19] run them, I'm going to damage the machines.
[20] But the original film—the film that it
[21] was made from—that any of them were made
[22] from—should be available through the Grinberg

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[1] Library in New York.
[2] Also, I believe, if I'm not mistaken,
[3] there's a copy of it in the SMU Archive in Dallas,
[4] because Oliver Stone licensed it from them, if I'm
[5] not mistaken.
[6] Q: We would like you to make a search for the
[7] Malcolm Couch film, to the best extent that you
[8] can.
[9] A: Okay.
[10] Q: Next, with Robert Croft.
[11] A: Robert Croft. The only copy I've got is
[12] from the printed page in the HSCA volumes.
[13] Q: Did you ever attempt to make a copy— Oh,
[14] that was the film that you did not have access to;
[15] is that right?
[16] A: Right. I'm not even sure what the
[17] original was, whether it was a Polaroid or a
[18] negative.
[19] Q: You won't need to bring Robert Croft with
[20] you. The next one is —
[21] A: By the way, if I may interject, the House
[22] Committee published the Croft photograph in black

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[1] and white. And I always thought it was black and
[2] white. But when I was in the Archives last year, I
[3] saw what was a color slide.
[4] It was not an original, I don't believe.
[5] I believe it was a duplicate. But if you need to
[6] see the Croft photograph, a much younger generation
[7] than anything I've ever come in contact with is
[8] there.
[9] Q: Okay. For the Jack Daniel film, what is
[10] the earliest generation that you have?
[11] A: Jack Daniel, I have first-generation
[12] copies directly from the original.
[13] Q: Where did you obtain the copies from the
[14] original?
[15] A: From Jack Daniel himself.
[16] Q: We would like you to bring that when you
[17] return.
[18] The next film is the DCA film. We did
[19] discuss that somewhat earlier. Could you remind me
[20] of what the earliest generation that you have of
[21] the DCA film is?
[22] A: I have to think about that. I'm not sure.

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[1] I have an early-generation copy of it. I have the
[2] copy that was made—which I made for the House
[3] Committee, as a matter of fact—directly from the
[4] original film. But I'm not clear what the
[5] generation of—what mine is. Probably, I'd say
[6] first, second, or third.
[7] Q: What were the circumstances under which
[8] you obtained the DCA film?
[9] A: Well, the Committee had gotten copies from
[10] someone who had been involved in DCA, and they were
[11] all copies of release prints.
[12] And years earlier, I had discovered that
[13] the original was still in the hands of Life
[14] magazine, and had seen it up there. And I informed
[15] the Committee about it, and the Committee contacted
[16] Life and got the original film from them.
[17] Q: Did you attempt to make a copy directly
[18] from the original in the possession of the
[19] Committee?
[20] A: Yes. So, I'm pretty sure— If I made a
[21] negative and then printed the negative, then, what
[22] I've got is a— I've got a print, which would be

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[1] second generation.
[2] If it was made as an Ektachrome, then,
[3] what I've got is either the original Ektachrome or
[4] a copy of the Ektachrome. That's why I'm not sure
[5] what generation I've got.
[6] Q: We would like you to bring that.
[7] A: That one, I can't bring today, because I
[8] don't have it with me. It's in the lab. I'm
[9] having individual frames blown up. It's been at
[10] the lab for sometime.
[11] Q: Which lab is that at?
[12] A: It's at a lab called Buckley's. Buckley's
[13] Lab.
[14] Q: Where is Buckley's Lab?
[15] A: In Delaware.
[16] Q: Do you have any other films related to the
[17] assassination that are at Buckley's Lab?
[18] A: No.
[19] Q: Do you have any films related to the
[20] assassination that are at any lab other than
[21] Buckley's?
[22] A: No.

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[1] Q: We would still like to obtain the version
[2] of the DCA film that you have. We can make
[3] arrangements to transfer that at a subsequent time,
[4] but that is called for by the subpoena. So, we
[5] won't be expecting you to produce that today, but
[6] we still will want to see it.
[7] A: Okay.
[8] Q: The next one on the list is Tom Dillard.
[9] Do you have any early-generation Tom Dillard
[10] photos?
[11] A: No. The stuff— When the Committee
[12] borrowed the Dillard photographs, they subjected
[13] them to radioactive analysis. And the people that
[14] did it neglected to take the radioactive coating
[15] off the films. They destroyed the negatives.
[16] So, the copies that are in good shape that
[17] I've got—the ones that have the image on them—all
[18] came from books or previous prints.
[19] Q: We would not be interested in any that
[20] came from books, but we are interested in any that
[21] came from previous prints.
[22] A: Okay. Now, those original negatives were

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[1] returned to the Dallas Morning News. So, they've
[2] got the originals. At least, that's what they told
[3] me.
[4] Q: So that I'm clear, the original negatives
[5] were not destroyed; is that correct?
[6] A: The original negatives were destroyed.
[7] Q: Were destroyed. So, the destroyed
[8] original negatives were the films that were
[9] returned to the Dallas Morning News?
[10] A: Right.
[11] Q: Okay.
[12] A: Apparently, a year after they were
[13] radiated, somebody realized the mistake and had the
[14] radiation removed. But by that time, the emulsion
[15] was so softened that it just peeled away—or melted
[16] away.
[17] Q: Were prints made before any deterioration
[18] in the film?
[19] A: The Committee did, but I didn't have
[20] access to them until well after they showed them to
[21] me. And I was afraid of them, because if they were
[22] radiated, who knows?

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[1] Q: Okay. Just to —
[2] A: I wrote a report for them, by the way, on
[3] that.
[4] Q: Okay. Just to recapitulate, we would like
[5] the earliest prints that you have, unless they were
[6] taken from books, of the Dillard photos.
[7] A: If I have them, they're of the damaged
[8] negatives without the image on them.
[9] Q: Okay.
[10] MR. MAYN: Can we go off the record?
[11] MR. GUNN: Sure. Off the record.
[12] [Discussion off the record.]
[13] BY MR. GUNN:
[14] Q: I have in my hands now, a copy of the book
[15] entitled "The Killing of A President", by Robert J.
[16] Groden. Mr. Groden, I assume that you're the
[17] author of the book that's in my hands now?
[18] A: Yes.
[19] Q: All right. Turn to pages 208 and 209 of
[20] the book.
[21] A: Okay.
[22] Q: Do you see any versions of the Dillard

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[1] photographs on pages 208 and 209?

[2] A: Yes, there's copies on both.

[3] Q: Now, you mentioned during your prior
[4] testimony that part of the Dillard photograph
[5] was—or the negative was destroyed. Is that
[6] negative to which you were referring shown on page
[7] 209?

[8] A: Actually, they were both destroyed, and
[9] they're both shown. The photograph on the right,
[10] on page 209, is the one where the emulsion melted
[11] off. The one on the left suffers from something
[12] that's known as reticulation, which is the emulsion
[13] cracking and peeling. And this is reproduced on
[14] page 208 in the lower left.

[15] Q: Can you tell me what the source material
[16] was that you used for the photograph in the top
[17] right-hand of page 208 is?

[18] A: That came from a book.

[19] Q: Which book did that come from?

[20] A: That, I don't remember. It's been
[21] published again and again. I think it was from
[22] "Cover Up", by Gary Shaw and Larry Harris.

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[1] Q: You have some blowups on pages 208 and 209
[2] from the Dillard photo; is that correct?

[3] A: That's correct.

[4] Q: What was your original source for the
[5] blowups that you've used on 208 and 209?

[6] A: I believe, a transparency. I believe it
[7] was from a transparency made from the original
[8] negative, but it was after the damage was done.

[9] Q: Where is the transparency that was made
[10] from the original negative?

[11] A: The ones that these photographs came from?

[12] Q: Yes.

[13] A: I have those somewhere. Those are
[14] somewhere in my collection.

[15] Q: Okay.

[16] A: That would require a search to find them,
[17] though.

[18] Q: Okay. Those are photographs that we are
[19] interested in.

[20] A: Okay.

[21] Q: And just so it is clear, we would like you
[22] to bring those to the deposition.

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[1] Could you look now at number 24 on the
[2] list, Joe Laird.

[3] A: I don't know who Joe Laird is.

[4] Q: I'll show you a photograph—a Xerox
[5] photograph of what may be Joe Laird images. Have
[6] you ever seen those images before?

[7] A: I may have seen them, but I don't have any
[8] photographic copies of them. I think I've seen
[9] these in "Pictures of the Pain"—the book "Pictures
[10] of the Pain". But I don't think I've seen them
[11] anywhere else.

[12] Is that what this is from?

[13] Q: I believe so. Well, if you don't have any
[14] images of it, then, you certainly can't bring them.

[15] The next one is John Martin.

[16] A: John Martin's film is in the DCA film.
[17] It's part of it.

[18] Q: Do you have any John Martin film, other
[19] than what is in the DCA film?

[20] A: No.

[21] Q: To the extent, then, that you would bring
[22] the DCA film, we would assume that that would

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[1] comply with the terms of the subpoena with regard
[2] to any films that you would have of John Martin.

[3] So, we won't make a separate request there.

[4] A: Okay.

[5] Q: Next one is Mary Moorman. Do you have any
[6] early-generation Mary Moorman films?

[7] A: The Moorman Polaroid photograph is
[8] still—as I believe, anyway—in the hands of Mary
[9] Moorman herself.

[10] The early-generation prints of the Moorman
[11] photograph are in the hands of Gary Mack. The
[12] copies that I had from Harold Weisberg and Josiah
[13] Thompson are all in his hands. All those source
[14] materials are his—or in his hands. He borrowed
[15] them because of the character who he discovered,
[16] called Badge Man.

[17] Q: Does that mean that the earliest-generation
[18] Moorman photographs that you have, you
[19] either gave or lent to Gary Mack?

[20] A: Lent to Gary Mack, yes. And I had
[21] borrowed them from someone else. He got permission
[22] from the people who had them, in order to keep

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[1] them. Before I'd release them, he got permission
[2] from them.

[3] Q: Do you still consider those Mary Moorman
[4] photographs that you have to be your property?

[5] A: How do you mean? I'm sorry.

[6] Q: Maybe I'm misunderstanding. Did you lend
[7] your personal property—i.e., the Mary Moorman
[8] photographs—to Gary Mack?

[9] A: No, those were not my property. Those
[10] were lent to me.

[11] Q: Okay.

[12] A: And then Gary Mack contacted the people
[13] that own those particular prints.

[14] Q: Okay. While those were in your
[15] possession—the Mary Moorman photographs, did you
[16] make any copies yourself?

[17] A: Yes.

[18] Q: We would like you to bring the Mary
[19] Moorman copies that you made from the prints to the
[20] deposition, as well as any other early-generation
[21] copies that you may have.

[22] The next one is Jim Murray.

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[1] A: Jim Murray. Jim Murray took lots of
[2] pictures through the plaza, I know.

[3] Q: Do you have any copies of Jim Murray
[4] photographs?

[5] A: Oh, the finding of the bullet? Yeah, but
[6] I'm not sure which ones are his.

[7] MR. GUNN: Let the record reflect I'm
[8] showing Mr. Groden some photographs that appear to
[9] be on their face Xerox copies of photographs by Jim
[10] Murray.

[11] THE WITNESS: I don't have all of these.
[12] I have some. And they're mostly copied from other
[13] books. To my knowledge, I have no originals of any
[14] of these.

[15] BY MR. GUNN:

[16] Q: Did the HSCA have access, either to the
[17] originals or early generations of the Jim Murray
[18] photographs?

[19] A: I don't know. I assume that they would
[20] have had access to it. Whether they had them or
[21] not, I don't know.

[22] Q: Unless you have first-generation negatives

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[1] or second-generation prints of the Jim Murray
[2] photographs, we won't ask you to bring any Jim
[3] Murray images.

[4] Do I understand your testimony to be that
[5] you do not have either negatives or first-generation prints
[6] of the Murray photograph?

[7] A: That is correct.

[8] Q: Would you turn to the next one on the
[9] list, Patsy Paschell. What is the earliest
[10] generation copy or original you have of the Patsy
[11] Paschell film?

[12] A: Probably fourth or fifth generation.
[13] Extremely blurry, out of focus, and very highly
[14] contrasty.

[15] Q: Where did you obtain your copy of the
[16] Paschell film?

[17] A: Patsy Paschell's film was subpoenaed—I
[18] believe it was subpoenaed by the HSCA. They had a
[19] copy that she represented as being the original,
[20] but it was not. I wrote a report for them, stating
[21] that it could not possibly be the original. But
[22] they never went back to get the original.

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[1] Q: Did you make a copy of the Paschell film
[2] on which you wrote your report?

[3] A: Yes.

[4] Q: We would like you to bring the copy you
[5] made from the HSCA version of the Paschell film.

[6] Do you have any earlier generation copies
[7] of the Paschell film, other than the one which I
[8] just mentioned that you made from the HSCA?

[9] A: No. But she has what she claims is the
[10] original herself right now.

[11] Q: Have you ever, in any commercial products,
[12] reproduced the Patsy Paschell film?

[13] A: Yes.

[14] Q: Where did you reproduce it?

[15] A: In the videotape program I did called "The
[16] Assassination Films".

[17] Q: What was your source material for that
[18] film?

[19] A: The duplicate of the duplicate of the
[20] duplicate of who knows how many duplicates that the
[21] HSCA had.

[22] Q: But it was the earliest generation that

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[1] you made from the version the HSCA had; is that
[2] right?

[3] A: Yes.

[4] Q: Do you have any originals or early-generation
[5] copies of James Powell photographs?

[6] A: Yes. I have early-generation copies. The
[7] House Committee allowed me the original on that,
[8] and I made copies for them and made copies for
[9] myself.

[10] Q: Okay. We would like you to bring those
[11] copies.

[12] Do you have any copies of the Arthur
[13] Rickerby photos?

[14] A: Only from Life magazine—a copy from the
[15] pages of Life magazine.

[16] Q: Did the House Select Committee have access
[17] to early-generation copies or the originals?

[18] A: I assume that they had access. I don't
[19] know whether they got them or not.

[20] Q: Did you have any role or responsibilities
[21] with regard to the Rickerby photos for the House
[22] Select Committee?

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[1] A: Not that I recall. Are there specific
[2] ones that you have in mind? Because he took lots.
[3] He took stuff at the airport.

[4] Q: Those that are of particular interest are
[5] in Dealey Plaza immediately after the shooting.

[6] A: I've seen the photographs before. And it
[7] is possible—it is possible that the bottom of
[8] these two—the bottom one of these two is one that
[9] we worked on for the picture of the Umbrella Man,
[10] who's sitting on the curb.

[11] So, if this is the one, then, yes, I did
[12] indeed deal with this one. But I'm not sure
[13] whether it was this one. There were so many of
[14] them that showed him, so I'm not clear.

[15] But the top one, I don't think we ever did
[16] anything on for the HSCA.

[17] Q: I would like to ask you to make a search
[18] of your records to determine whether you have any
[19] early-generation copies of the Rickerby photos.

[20] MR. GUNN: I'll state for the record that
[21] it's my understanding that the House Select
[22] Committee did have the original Rickerby photos.

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[1] THE WITNESS: I'll check.

[2] BY MR. GUNN:

[3] Q: The next one is George Smith. Do you have
[4] any originals or early-generation George Smith
[5] photographs?

[6] A: Again, George Smith was one of the three
[7] photographers that took pictures of the tramps—the
[8] three tramps that were arrested. I don't know
[9] which are which of those. I know that I copied the
[10] Smith photographs from books and from other
[11] photographs through the years; but as far as I
[12] know, I've never had the originals.

[13] But I may have. The House Committee did
[14] have some original negatives, but I don't know
[15] which was which.

[16] Q: You can look at number 39 on the list,
[17] where we refer to tramp negatives. In your search,
[18] we would like you to search for any tramp negatives
[19] or early-generation photos of the tramps, whether
[20] by George Smith or others.

[21] A: Okay. The negatives were all turned over
[22] to the House Committee. If I have anything, it

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[1] would be prints.

[2] Q: Okay. Although your list may say
[3] "negatives" on there, we're not intending that to
[4] be—for the purposes of the search—just negatives,
[5] but include early-generation copies.

[6] A: Okay.

[7] Q: Do you have any originals or early-generation
[8] copies of Jim Towner photographs?

[9] A: Yes.

[10] Q: What do you have?

[11] A: First-generation duplicate slides.

[12] Q: Do you have any others, in addition to
[13] first-generation duplicate slides?

[14] A: Probably do. Probably have later-generation
[15] copies of the first-generation slides I
[16] made.

[17] Q: We would like you to bring to the
[18] deposition the earliest-generation Jim Towner
[19] photographs that you have.

[20] The next one is number 35, Jack Weaver.
[21] Do you have any original or early-generation George
[22] Weaver?

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[1] A: The Weaver stuff I got was stuff that was
[2] photocopied out of "Six Seconds In Dallas" and
[3] stuff that was made at the National
[4] Archives—copies that you have the originals of.
[5] Q: Other than those two sources that you just
[6] mentioned, did you obtain any copies from any other
[7] sources?
[8] A: No.
[9] Q: You don't need to bring those, then, with
[10] you.
[11] Do you have any early-generation copies or
[12] originals of the David Weigman film?
[13] A: It says you have movie stills here. In
[14] fact, Weigman is a black and white motion picture
[15] film.
[16] Q: Do you have any originals or early-generation
[17] copies of the Weigman film?
[18] A: I have a early copy of a Weigman film.
[19] Q: Where did you obtain your copy?
[20] A: From a film archive. I think it's the
[21] First Library in Long Island City in New York.
[22] It's commercially available.

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[1] Q: Other than that commercial archive, did
[2] you obtain the photograph from any other source?
[3] A: The film, actually, appears in
[4] virtually—I'd say, probably 50 percent of the
[5] commercial documentaries that are out there.
[6] Q: We would like you to bring with you the
[7] earliest-generation Weigman film that you have.
[8] Do you have any early-generation or
[9] original Phillip Willis photographs?
[10] A: The original Phil Willis photographs are
[11] all in the possession of his widow, Marilyn.
[12] Q: Did you have —
[13] A: At least, to the best of my knowledge,
[14] they are.
[15] Q: All right. Did you have access to the
[16] original Willis photographs while you worked at the
[17] HSCA?
[18] A: I don't believe so.
[19] Q: Did you make any copies of any Willis
[20] photographs while you worked at the HSCA?
[21] A: I don't think so. I bought a set of the
[22] slides from him, but they're very poor quality,

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[1] commercial-grade copies. They've been available
[2] since the 1960s.
[3] Q: What is the best copy that you have of the
[4] Willis photographs?
[5] A: Just slides that I purchased from him.
[6] Q: Have you ever reproduced the Willis
[7] photographs in any commercial publication of your
[8] own, videotape or book?
[9] A: Yes. I did it in my books.
[10] Q: And what was the source material for the
[11] photograph that appears in your book?
[12] A: The slides that I had purchased from him.
[13] Q: We would like you to bring the slides that
[14] you purchased from Phillip Willis, as well as any
[15] other early-generation photographs that you have.
[16] Moving right along —
[17] A: That's easy for you to say.
[18] Q: — to Oswald backyard pictures. Did you
[19] have access to early-generation or original
[20] photographs of the Oswald backyard pictures while
[21] you were at the HSCA?
[22] A: I saw the originals. They never granted

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[1] me access, as far as duplicating goes from the
[2] originals. As a matter of fact, I had copies made
[3] at the National Archives years earlier, where the
[4] original films—the original photographs are.
[5] Q: Other than those that you obtained from
[6] the National Archives, did you have any—do you
[7] have any other early-generation copies?
[8] A: No. Everything else is from books or
[9] other people's work. That's much later-generation
[10] than that.
[11] Q: Have you ever published yourself, either
[12] in videotape or book, photographs of the Oswald
[13] backyard pictures?
[14] A: Yes.
[15] Q: What were your source materials for those
[16] photographs?
[17] A: The pictures I obtained from the Archives.
[18] Q: We won't ask you to bring any of the
[19] Oswald backyard photographs.
[20] I'd like to jump down the list to one that
[21] is not on your list. Do you have any early-generation or
[22] original photographs of the White

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[1] House press conference that was held in Dallas
[2] following the assassination, where Malcolm Kildoff
[3] announced the death of the president?

[4] A: At the White House?

[5] Q: It was a White House press conference, but
[6] it was at Parkland Memorial Hospital.

[7] A: Yes. Those— I got prints of that from
[8] "The Men Who Killed Kennedy". I copied it from the
[9] available documentary.

[10] Q: Other than from the— Let me withdraw
[11] that. Is the copy that you have taken directly
[12] from "The Men Who Killed Kennedy" video?

[13] A: Yes.

[14] Q: So, you did not go back to the source that
[15] "The Men Who Killed Kennedy" used in preparing
[16] their video; is that correct?

[17] A: No.

[18] Q: Okay. You don't need to bring any copy of
[19] the Dallas press conference.

[20] A: Okay.

[21] MR. GUNN: Can we take a very short break,
[22] for just one minute.

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[1] [Recess.]

[2] BY MR. GUNN:

[3] Q: Let me try one more issue. Could you look
[4] at number 43 on your list, Ernest Montesana.

[5] A: Yeah, that's a mistake. It's not a black
[6] and white movie. It's a color movie.

[7] Q: And that's part of the DCA film; is that
[8] correct?

[9] A: Yes. It's part of the DCA, yes.

[10] Q: Do you have any Montesana early-generation
[11] or original copies, other than what you would have
[12] with the DCA film?

[13] A: No.

[14] Q: Okay. If we could go back over the list,
[15] just to make a quick rundown of those films for
[16] which we would like you to make a particular
[17] search, in order to bring back originals or early-generation
[18] films that you would have. And I'll
[19] just go down the list.

[20] I'm going to leave out some that you have
[21] already brought with you today. But I don't mean
[22] to exclude those to the extent you have other

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[1] earlier-generation copies of those.

[2] But those that we'd like you particularly
[3] to look for now are numbers two, three, and
[4] four—all related to the autopsy; the William
[5] Allen; James Altgens; Thomas Alyea; Hugh Betzner;
[6] Wilma Bond; Malcolm Couch; Jack Daniel; the DCA
[7] film; Tom Dillard; Mary Moorman; Patsy Paschell;
[8] James Powell; Arthur Rickerby; George Smith; Jim
[9] Towner; David Weigman; Phillip Willis; and the
[10] tramp photographs to the extent they are not
[11] otherwise covered.

[12] A: Okay.

[13] MR. GUNN: Now, could we go off the record
[14] for a minute.

[15] [Lunch recess.]

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AFTERNOON SESSION

[1] Whereupon,

[2] ROBERT J. GRODEN

[3] resumed the stand, and having been previously duly
[4] sworn, was examined and testified further as
[5] follows:

CONTINUED EXAMINATION BY COUNSEL FOR
THE ASSASSINATION RECORDS REVIEW BOARD

BY MR. GUNN:

[10] Q: Mr. Groden, did you have an opportunity to
[11] go to your house during the lunch break?

[12] A: Yes, I did.

[13] Q: Were you able to locate any of the
[14] photographs that we had discussed prior to the
[15] break?

[16] A: Yes. Yes, indeed.

[17] Q: Could we go through the photographs that
[18] you were able to identify, in the order that makes
[19] the most sense to you? I'll just let you choose
[20] the first one, and then we can make reference to
[21] the number on the records that I gave you.

[22] A: Okay. Well, I'll just pull them off the

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[1] top of the pile as they come up. They're in no
[2] particular order.
[3] The first is the Dillard photographs. I
[4] was able to find my copy of the closer of the two.
[5] One was severely damaged by the HSCA photo people.
[6] And also the other one, showing the man in the
[7] opposite window at the west end.
[8] Both of these are my originals, so please
[9] be careful with them. As we do this, I'm going to
[10] make files for each one.
[11] Q: Okay. So, for the Dillard, we are
[12] receiving two prints; is that correct?
[13] A: That is correct.
[14] Q: Mr. Groden, you are now writing your
[15] name—your initials on the back of the photographs,
[16] along with the name of the photograph; is that
[17] correct?
[18] A: Yes, indeed. I'm going to do that on all
[19] of the photographs—if I can get them out of their
[20] sleeves. Of course, this is the only one that's in
[21] a sleeve.
[22] Okay. Additionally, where Dillard is

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[1] concerned, I also have three slides with them, as
[2] well. I found the one from the book that I had
[3] used as the full slide, also showing the west end
[4] window, and an extreme blowup of the man in the
[5] west window.
[6] Q: Were all three photographs taken from
[7] books?
[8] A: No. These—the two blowups were taken
[9] from the original.
[10] Q: Okay.
[11] A: I don't have enough slide pages to
[12] separate them, so I'll write on them what they are.
[13] And I'm sure that the —
[14] Q: Okay.
[15] A: — Committee or the Review Board can
[16] afford a couple of slide pages. I hope. So, that
[17] adds three slides to the Dillard collection.
[18] Okay. Nix is already in the file folder.
[19] These are the autopsy photographs. Again, these
[20] are my originals, so please be careful. There are
[21] five color, and eight black and white.
[22] Q: Could you describe the size of the prints?

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[1] A: They're eight-by-ten prints. I'm going to
[2] put my initials on the back of each one. That will
[3] make it a total of 13 prints.
[4] Q: I'd like to take a brief look at those.
[5] I'll put on gloves, if you like.
[6] A: If you hold them on the edge, I don't
[7] care. As long as the surface doesn't get
[8] fingerprints.
[9] Q: Are these photographs—that have been
[10] marked as autopsy photographs—the originals that
[11] you used for the book "Killing of a President"?
[12] A: No. I made duplicate slides of these
[13] photographs, and those are the ones I submitted. I
[14] wouldn't let the originals out of my hands.
[15] Q: So, the photographs, then, in the book are
[16] two generations removed from the photographs that
[17] we have here in the room today; is that correct?
[18] A: Well, yeah, these photographs. Then you
[19] have slides that were made from these pictures.
[20] And then you've got the plates that were made—the
[21] separations that were made for the book. And then
[22] the book itself. So, it's probably three

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[1] generations later.
[2] There are photographs, here, I don't
[3] believe were even used in the book.
[4] Q: Have you ever possessed any other image
[5] from the autopsy, in addition to those that you
[6] have here today?
[7] A: No. I have seen additional ones, but
[8] they're not here. I didn't—I didn't quite get
[9] those. Nobody got those.
[10] Q: Have you seen an image that is not present
[11] in the collection at the National Archives?
[12] A: No. But I have seen images in the
[13] National Archives that are not in the inventory.
[14] Q: Where did you obtain the black and white
[15] photographs?
[16] A: From David Lifton in California.
[17] Q: Where did you obtain the color
[18] photographs?
[19] A: From my work with the House Assassinations
[20] Committee.
[21] Q: How did you obtain them through the House
[22] Assassinations Committee?

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[1] A: I went in and made copies for test prints.
[2] I kept some of them.
[3] Q: Did you make the copies from the originals
[4] in the Archives, or did you make them from
[5] photographs that had been made of the originals, if
[6] you know?
[7] A: They were made from duplicates in the
[8] House Committee's collection, not from the
[9] originals.
[10] Q: Did you have authorization from anyone to
[11] make copies of any of the autopsy photographs?
[12] A: They knew I was making them. In other
[13] words, I was making them for the Committee at the
[14] same time.
[15] Q: Did you have authorization from anyone at
[16] the House Select Committee on Assassinations to
[17] keep copies of the photographs for yourself?
[18] A: Not specifically.
[19] Q: Did you have it generally?
[20] A: I don't think that the issue ever
[21] specifically came up.
[22] Q: Did you ever tell anyone on the House

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[1] Select Committee staff that you were keeping copies
[2] of color photographs from the autopsy?
[3] A: I don't believe so.
[4] Q: Okay. The next ones that you have?
[5] A: The next ones are the Moorman photographs.
[6] Q: If I could apologize for a moment, let me
[7] just ask one last wrap-up question with the autopsy
[8] photographs.
[9] Do you now have any other photographs of a
[10] earlier generation of autopsy photographs in your
[11] possession, custody, or control?
[12] A: No, these are the originals.
[13] Q: Okay. Moorman, I believe you said, is the
[14] next one?
[15] A: Yeah.
[16] Q: And that's number 26 on our list.
[17] A: You have one copy of the first Moorman
[18] photograph, and two copies of the third. The
[19] second one was never handed over to any government
[20] agency, and was destroyed by a Dallas policeman.
[21] I gave you two copies of number three,
[22] because the darker one is made from a first-generation

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[1] negative that was made that day. And
[2] the lighter one was from a duplicate at some
[3] unknown period. So, I gave you both.
[4] Q: Okay.
[5] A: Next are the—oh, I just went blank—the
[6] Altgens photographs.
[7] Q: How many Altgens photographs did you
[8] bring?
[9] A: I'm counting them now. Seven. Which, I
[10] believe, is the entire inventory.
[11] Q: So, you brought today one of each of the
[12] seven different Altgens images; is that correct?
[13] A: Yes. All made from the original
[14] negatives.
[15] Q: I notice on the Altgens photographs that
[16] there are quite a few light scratches on those.
[17] A: Those are actually processing marks. When
[18] I did those, I didn't have a good dryer available
[19] to me. And they're, unfortunately, not the best
[20] quality prints. But some of those are the only
[21] ones that I've got.
[22] Q: Have you reproduced any of the Altgens

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[1] photographs in any of your books?
[2] A: Yes.
[3] Q: And are these the originals that you
[4] use—or the source originals for the copies that
[5] end up being published in your books?
[6] A: Yes. I would have made duplicate slides
[7] of these to submit to the publisher.
[8] Q: Okay. What is the next one that you have?
[9] A: Hugh Betzner.
[10] Q: And what did you bring from the Betzner
[11] photographs?
[12] A: All three. One eight-by-ten print of all
[13] three.
[14] Q: Let me take a look at that. So the record
[15] is clear, are these the earliest-generation copies
[16] that you have of the Betzner films?
[17] A: Yes. These, I believe, are made directly
[18] from the original negatives —
[19] Q: Okay.
[20] A: — or what was submitted to the Committee
[21] as being the original negatives.
[22] Q: All right. What's the next one?

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[1] A: The next one are the tramp photographs.
[2] Q: How many photographs did you bring?
[3] A: Eight of them. Which is interesting,
[4] because I thought there were only seven; but there
[5] are eight.
[6] Q: They're all eight-by-ten positives; is
[7] that correct?
[8] A: That's correct. My mind is blank as to
[9] the third photographer. I brought Allen, Smith,
[10] and for the life of me, I can't —
[11] MR. MAYN: Beers.
[12] MS. DENK: Beers.
[13] THE WITNESS: Jack Beers, thanks.
[14] BY MR. GUNN:
[15] Q: What are the next photographs that you
[16] have?
[17] A: Now we're going into slides,
[18] transparencies. I've already mentioned the Dillard
[19] ones. Well, these are not in any particular order.
[20] I've got the Willis slides here, and
[21] there's 13 I have here. There is a duplicate of
[22] Willis 5. One is made from the original I got from

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[1] him—one is the original I got from him, and the
[2] other one is from his commercial set that has the
[3] arrow pointing toward the President. So, there's
[4] 13 of those.
[5] Q: And these are the photographs that you
[6] purchased directly from Mr. Willis; is that
[7] correct?
[8] A: That is correct. At least, I believe
[9] that's correct. I have some that look a lot worse
[10] than these. These, I believe to be the best ones
[11] I've got. His were all very, very pink and faded.
[12] These are also pink, but they—these look actually
[13] better density than the stuff that I remember.
[14] Q: Are these, in any case, the earliest-generation
[15] copies that you have?
[16] A: I believe that they are. The one that
[17] your finger is by there, the greener one—there,
[18] that one—is actually closer to the original than
[19] any of the ones in the commercial set.
[20] Q: This is the one of the Willis collection
[21] that is not itself labeled—contains no marks, and
[22] it is a picture of the presidential limousine and

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[1] the backup Queen Mary as it's descending down Elm
[2] Street; is that correct?
[3] A: Yes. I'll mark that Willis 5, just to be
[4] safe.
[5] MR. GUNN: So, the record will reflect
[6] that you are now marking the Willis slide and
[7] writing the name "Willis" on the slide.
[8] THE WITNESS: Next— Oh, you haven't asked
[9] for it.
[10] BY MR. GUNN:
[11] Q: No, go ahead. The next one, please?
[12] A: Next is the Powell photograph.
[13] Q: Is there more than one photograph?
[14] A: No, there's only one.
[15] Q: And this, of course, is a slide
[16] transparency?
[17] A: That's correct.
[18] Q: I don't now recall whether you identified
[19] the source of this when we went through this this
[20] morning. But the source for the Powell photograph
[21] was?
[22] A: The HSCA.

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[1] Q: The next one —
[2] A: Which was, in turn, I believe, from the
[3] FBI.
[4] Q: The next one you have?
[5] A: Next are all four of the Towner slides.
[6] Q: And those slides are the earliest
[7] generation that you have; is that correct?
[8] A: Yes. These are made directly from the
[9] camera originals. These are first generation.
[10] It's the original square format reduced to 35
[11] millimeter, so that you have the entire picture
[12] area.
[13] Q: Okay. The next ones?
[14] A: The next ones are the Bond slides—Wilma
[15] Bond slides.
[16] Q: How many Bond slides are there?
[17] A: There are nine of them.
[18] Q: Are these the earliest-generation copies
[19] that you have?
[20] A: Yes. They start with number two. Number
[21] one is not part of the set, if there is a number
[22] one. It's never been— It was probably taken

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[1] before the motorcade. So, they're numbered two
[2] through ten, but there's nine of them.

[3] Q: Okay. And the next ones you have?

[4] A: That's it for the still images. Next is
[5] films. Paschell, color print, 35 millimeter.

[6] Q: And that's a motion picture?

[7] A: Yes.

[8] Q: Next one?

[9] A: Next one is the Weigman film, 16
[10] millimeter, black and white print.

[11] Q: This is the one you obtained from the Long
[12] Island City Archives?

[13] A: Yes.

[14] Q: And the Weigman film is the earliest-generation
[15] copy that you have; is that correct?

[16] A: That's correct. It's made directly from
[17] their archival copy, which, I believe, was a
[18] negative.

[19] Next is a 16 millimeter Ektachrome of the
[20] Daniel film.

[21] Q: And your copy of the Daniel film is the
[22] earliest-generation copy that you possess?

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[1] A: Yes. It says "original". So, it would be
[2] the first one.

[3] Q: And the next one?

[4] A: And the next one, which is also the last
[5] one, is the Alyea film.

[6] Q: Would you describe that one, please?

[7] A: Sixteen millimeter, black and white print.

[8] Q: Where did you obtain the Alyea film?

[9] A: That, I don't remember. I don't know.

[10] Q: According to my list—my records, there
[11] are three films that you did not bring this
[12] afternoon, if we could go through those.

[13] A: Okay. The Couch film was one of them, and
[14] that's the one I don't have a print of. All I have
[15] is the defective videotape copy, and I'm not sure
[16] where that one is.

[17] But the one that's viewable is on my "The
[18] Assassination Films" videotape, and that's made
[19] directly from my source. Unfortunately, the
[20] quality is really, really bad. There are better
[21] copies of that available. I've seen it on ABC
[22] documentaries all the time.

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[1] Q: Okay. So you understand, you are under a
[2] continuing obligation—if you identify it, locate
[3] it, or learn where that is—to inform the Review
[4] Board of that fact.

[5] A: Okay. Sure, okay.

[6] Q: The second one that I have is the DCA
[7] film, which we discussed this morning. And that is
[8] at a lab right now —

[9] A: Right.

[10] Q: — is that correct?

[11] A: Right. And when they're finished with it
[12] at the lab, I'll get it to.

[13] Q: Okay. And the last one that I have is the
[14] Arthur Rickerby black and white photos.

[15] A: Which I don't have any file on. I don't
[16] have a Rickerby file.

[17] Q: Could you describe for me, very briefly,
[18] how it was that you were able to locate the films
[19] that you brought this afternoon? Did you go back
[20] and look at an index, or in a filing cabinet under
[21] alphabetical order, or just —

[22] A: No. I just started looking for specific

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[1] items within the filing cabinet and within the
[2] files that I have. Some of the ones that you asked
[3] for, for this afternoon, were beyond the scope of
[4] what you asked for the other day on the phone.

[5] Now, I have no problem giving them to you.
[6] I mean, they were not close to originals. And
[7] because of the poor quality and since they're so
[8] far away from available originals, I didn't think
[9] that you needed those.

[10] Q: Okay. I'm not certain that I agree with
[11] your characterization of our conversation, but I
[12] don't see that as being material.

[13] A: Okay.

[14] Q: So, I think we can go on. And I assume
[15] it's a good-faith lack of communication on that
[16] issue.

[17] Now I'd like to go into some other
[18] questions, if we could. First, have you ever sold
[19] or otherwise given away at any point any of your
[20] best or earliest-generation negatives or positives?

[21] A: Many years ago, I sold an early—one of my
[22] early-generation prints of the Zapruder film. I've

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[1] given away first-generation copies of the stuff
[2] that I have to legitimate researchers many times
[3] through the years.

[4] Q: My question would be whether you have ever
[5] parted with your earliest—your own earliest-generation—

[6] A: Oh, no.

[7] Q: Do you currently have at your home any
[8] photos or images related to the assassination that
[9] belong to others—people other than yourself?

[10] A: There are some videotapes that I have
[11] borrowed from other people that I have not yet
[12] returned. But, once again, they're multi-generation.

[13] Q: With the exception of the videotapes, are
[14] there any earlier-generation copies than what you
[15] have brought here today that you have at your home
[16] that, nevertheless, belong to somebody else?

[17] A: No.

[18] Q: Did you speak to anyone after receiving
[19] the subpoena about the fact that you had been
[20] subpoenaed by the Assassination Records Review

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[1] Board?

[2] A: Yes. I spoke to a couple of attorneys I
[3] knew, to get their feedback on what they thought.

[4] Q: With the exception of the attorneys, did
[5] you speak with anyone else?

[6] A: Possibly to some researchers. I'm pretty
[7] sure I did. I had spoken to the attorneys; and
[8] somehow or other, the attorneys let the word out.
[9] Not with my particular desire for them to do so,
[10] but several people have asked me about it—people
[11] who I have not told.

[12] Q: Did you ask any questions or speak to
[13] anyone about the possibility of your, perhaps,
[14] having additional films beyond those that were
[15] currently in your possession at your home?

[16] A: I think one or more people asked whether I
[17] thought that anybody else thought that I might have
[18] additional materials that I had never published.
[19] Which is not the case. I've published everything
[20] I've got. Everything that was relevant to the
[21] case, I published in the books or the videotapes.

[22] Q: Do you have any— Could you look at the

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[1] third paragraph of the subpoena, under documents
[2] and photographs. Could you tell me whether you
[3] have any documents responsive to the third
[4] paragraph?

[5] A: I don't believe I have any. I don't think
[6] I have anything in the way of—that even comes
[7] close to that. I don't think I do.

[8] Q: While you worked at the HSCA, did you ever
[9] take any notes regarding the work that you were
[10] doing?

[11] A: I don't think so. I really don't think
[12] so. If I did, it's 20 years ago.

[13] Q: Have you ever told anybody that you kept
[14] notes from the time that you worked at the House
[15] Select Committee on Assassinations?

[16] A: I had written the House Committee memos,
[17] and those memos have been published in the
[18] Committee volumes. And I do believe I have made
[19] copies of those memos, possibly—Xerox copies of
[20] the memos that are published in those books.

[21] Q: With the exception of those memos, did you
[22] ever tell anyone that you had any other notes

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[1] related to your work at the HSCA?

[2] A: I don't recall. I don't think so.

[3] Q: In the ordinary course when you are doing
[4] photographic work, either making film-to-film
[5] copies from originals or making enlargements, do
[6] you keep any kind of written record of what it is
[7] that you're doing, such as the number of frames
[8] that were done, exposures, timing—that sort of
[9] thing?

[10] A: Usually not. I mean, I may at the time.
[11] But, you know, once the job was done, I would throw
[12] those things away.

[13] Q: Do you —

[14] A: Like layout sheets, for instance, for
[15] motion picture duping. You have layout sheets
[16] describing exposure, color correction, things like
[17] that. But once the job is done, there's no need
[18] for it anymore.

[19] Q: If you were to make a copy at a later
[20] time, would it be useful to know at what exposure
[21] you had made a particular reproduction?

[22] A: If you were going to do it again, it

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[1] probably would. But then again, if you're shooting
[2] on a different type of stock, any production
[3] numbers that you would use would be invalid,
[4] because the different emulsions change all the
[5] time. You'd have to run new test prints.
[6] And, normally, when you're doing stuff
[7] like this, what you do is, you shoot the negative,
[8] and the lab does the printing. So, the labs would
[9] use the notes, and then they would throw those away
[10] when they're finished with it.

[11] Q: Have you ever entered into any contract to
[12] either sell copies of films, license copies of
[13] films, or purchase copies of films?

[14] A: I've licensed copies of my footage to some
[15] researchers and film makers, yes.

[16] Q: Approximately, how many contracts have you
[17] entered into regarding photographic imagery from
[18] the Kennedy assassination?

[19] A: I have no idea. If you count contracts
[20] for my books, allowing my footage to be used by
[21] Oliver Stone, one researcher in particular—
[22] David Lifton wanted copies of all my

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[1] stuff. He wanted to make videotape copies of all
[2] my stuff. I entered into a contract with him,
[3] which I always regretted, because he never lived up
[4] to his contract.

[5] I'd say probably, at least—at least, a
[6] half a dozen contracts through the years.

[7] Q: Do you keep copies of those contracts?

[8] A: Some. I'm sure I have some.

[9] Q: Do you know, for example, whether you have
[10] a contract with—if you have a copy of the contract
[11] with Oliver Stone?

[12] A: That, I must have.

[13] Q: Do you recall, for example, whether you
[14] have a copy of the contract with David Lifton?

[15] A: The contract with David Lifton was one
[16] that he printed out on his portable computer. And
[17] it was a very sloppy one. I'm sure I have it
[18] somewhere. I haven't seen it in a lot of years,
[19] but I know I have it somewhere.

[20] Q: Do you keep all of your contracts in a
[21] file together, or could they be scattered
[22] throughout your filing system?

[1] A: They could be virtually anywhere.

[2] Q: Could you describe for me, in just a
[3] general way, what New Frontier Productions is?

[4] A: New Frontier Productions is a company that
[5] I created to release videotapes of the
[6] assassination, to make them available to
[7] researchers and people that were interested in the
[8] case.

[9] Q: Is it incorporated?

[10] A: No.

[11] Q: Is it licensed to do business in any of
[12] the states?

[13] A: I don't know what you mean by that.

[14] Q: Is it registered with any state authority?

[15] A: It's registered here in Pennsylvania.

[16] Q: Does New Frontier Productions, as separate
[17] from yourself, own or possess any photographic
[18] images from the assassination of President Kennedy?

[19] A: They would be the same images.

[20] Q: So, if the subpoena, for example, had read
[21] both to Robert Groden and New Frontier Productions,
[22] would you have brought more images, or would they

[1] just be exactly the same?

[2] A: Exactly the same.

[3] Q: What is Groden Films?

[4] A: Groden Films is just the name of my
[5] production company for producing the videotapes.

[6] Q: Is Groden Films incorporated?

[7] A: No.

[8] Q: Does Groden Films possess any
[9] assassination images beyond any that you, yourself,
[10] possess?

[11] A: No.

[12] Q: Are you affiliated with any other company,
[13] in addition to New Frontier Productions and Groden
[14] Films?

[15] A: Slides Unlimited and Images Unlimited.

[16] Q: Does either Slides Unlimited or Images
[17] Unlimited possess any images related to the
[18] assassination of President Kennedy beyond those
[19] that you possess yourself?

[20] A: No. Neither of them possess anything
[21] relating to the case.

[22] Q: I'd like to start now with a little bit of

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[1] your biographical background. We did some of that
[2] when we started out, but I have a few other
[3] questions that I'd like to ask you.

[4] First, I'd like to show you a copy of a
[5] resume, and ask you whether you have previously
[6] seen it?

[7] MR. GUNN: I'd like to ask the reporter to
[8] mark this as Exhibit 5.

[9] [Deposition Exhibit No. 5
[10] marked for identification.]

[11] THE WITNESS: It seems accurate, but I
[12] don't—I don't remember when I would have written
[13] this for it.

[14] BY MR. GUNN:

[15] Q: Do you recall whether you, in fact,
[16] prepared the document that's now marked Exhibit 5?

[17] A: I don't know. I don't remember doing it,
[18] but it is accurate.

[19] Q: Mr. Groden, do you recall whether you
[20] prepared the resume for the Rockefeller Commission?

[21] A: I don't remember. It's entirely possible,
[22] but I don't remember it.

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[1] Q: I'd like to ask you two or three questions
[2] about parts of the resume. First, did you ever
[3] attend college?

[4] A: Did I?

[5] Q: Yes.

[6] A: When I was in the service, I did—for one
[7] year. I got one year's college credit and started
[8] the second, but never finished it. I got my
[9] discharge.

[10] Q: Did you graduate from high school?

[11] A: Did I graduate from high school? I got a
[12] GED, general education development diploma.

[13] Q: And that was while you were in the Army?

[14] A: Yes.

[15] Q: What area of the Army were you in?

[16] A: Infantry.

[17] Q: And where were you stationed?

[18] A: Originally, Fort Dix. Then Fort Benning.
[19] Then Kitzingen, Germany.

[20] Q: Did you do academic work during the time
[21] that you were in the Army?

[22] A: You mean relating to the GEDs?

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[1] Q: Yes.

[2] A: Yes.

[3] Q: Taking correspondence courses, or did you
[4] just take an examination?

[5] A: Well, I started—I took an examination for
[6] the first part, passed that, and then started
[7] taking correspondence or—I can't remember whether
[8] it was correspondence or whether it was actual
[9] classes, to start for the second year college
[10] credit.

[11] I was doing that when I was in Fort
[12] Benning. And then they transferred me to Germany,
[13] and I never got a chance to finish.

[14] Q: How long was your tour of duty projected
[15] to be in the Army?

[16] A: Originally, two years.

[17] Q: Why was it that you were in for only one
[18] year?

[19] A: I got a medical discharge.

[20] Q: When is the first time that you did any
[21] work, either compensated or not compensated, in the
[22] area of photography, or enlargement, or photo

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[1] processing?

[2] A: The first work I ever did in photography?
[3] I would say probably around 1961, probably.

[4] Q: And what kind of work was that?

[5] A: Printing—contact printing, lab work,
[6] black and white work.

[7] Q: Was that at Forest Hills High School or at
[8] a lab outside of the —

[9] A: No, it was on my own.

[10] Q: When is the first time that you were
[11] compensated financially for photographic work?

[12] A: Around 1969.

[13] Q: Was that at EFX Unlimited?

[14] A: Yes.

[15] Q: How did you come to obtain a position at
[16] EFX Unlimited?

[17] A: The number two man in the company had a
[18] best friend, whose girlfriend was involved in the
[19] New York state employment service. And I went to
[20] apply, to be—to try to find work. At the time, I
[21] was out of work. And she was impressed with what
[22] she saw, and told me about the job, which hadn't

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[1] even been listed yet, and she sent me there. And I
[2] was one of the people who applied for the job, and
[3] I got it.

[4] Q: Is EFX Unlimited the laboratory where Mo
[5] Weitzman worked?

[6] A: Yes.

[7] Q: What was your title when you first began
[8] at EFX Unlimited?

[9] A: Well, basically, I was a trainee in the
[10] optical effects field.

[11] Q: How long did you work there,
[12] approximately?

[13] A: I guess, about four years—on and off. I
[14] worked there, and then they had a layoff, because
[15] there was—business was bad. And then they hired
[16] me back again.

[17] Q: Is there a reason that the resume doesn't
[18] have a period more than just the one year for 1969?

[19] I note, also, the resume does say 1973
[20] that you also worked at EFX Unlimited.

[21] A: Yeah.

[22] Q: For 1961 to '64, you have being at Forest

[1] Q: Again, other than the Zapruder film, which
[2] I mean neither to include or exclude for the
[3] purposes of the substance of your question, was EFX
[4] Unlimited performing any other work related to the
[5] assassination during the 1969 to '72 period?

[6] A: Not that I'm aware of.

[7] Q: With relationship to the Zapruder film,
[8] from your prior testimony I understand that the
[9] company did work on the Zapruder film in that
[10] period; is that correct?

[11] A: No, it was a previous company that had
[12] worked on it. I don't think that they worked on it
[13] at that time as EFX Unlimited. I think that EFX
[14] Unlimited became an entity after the work was done.

[15] Q: Was the name of that prior company
[16] Manhattan Effects?

[17] A: It could well have been.

[18] Q: Do you know the name of the prior company?

[19] A: No.

[20] Q: Do you know who the person was who was
[21] responsible for the Zapruder film at the prior
[22] company?

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[1] Hills High School. And you also have a year range
[2] when you were at A-1 Record Sales from '67 to '68.
[3] But I only notice one year, 1969, for EFX
[4] Unlimited.

[5] A: That's when I started there, but I
[6] didn't—I don't know why I didn't do that. I
[7] could have gone from '69 to '72, and then started
[8] again '73 to '73. But only twice did I have a
[9] range. The rest were all the starting dates.

[10] Q: After being a trainee at EFX Unlimited,
[11] did you obtain any other position at EFX?

[12] A: Well, I advanced in the field. I was an
[13] optical cameraman. And I started as a trainee, and
[14] ended up being a journeyman.

[15] Q: While you were at EFX Unlimited in the
[16] 1969 to approximately 1972 range, did you have any
[17] contact with any films or projects related to the
[18] Kennedy assassination, other than the Zapruder
[19] film?

[20] A: While I was actually working there?

[21] Q: Yes.

[22] A: I don't believe so.

[1] A: No.

[2] Q: So, you don't know whether it was Mo
[3] Weitzman, for example, who was responsible for the
[4] work on the Zapruder film prior to 1969?

[5] A: No.

[6] Q: While you were at EFX Unlimited, did you
[7] ever see any negatives, positives, copies of the
[8] Zapruder film?

[9] A: The one print that I told you about.

[10] Q: And that you saw during the 1969 to '72
[11] period?

[12] A: Yes. I would say probably '69 to '70, to
[13] be more exact.

[14] Q: According to this resume, you were back at
[15] EFX Unlimited in 1973; is that correct?

[16] A: I believe so. As I said, it's been a lot
[17] of years; but that's probably right.

[18] Q: Did you perform any work at all related to
[19] Kennedy assassination photographs during the time
[20] that you were at EFX Unlimited in the 1973 area?

[21] A: As a part of the job?

[22] Q: Yes.

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[1] A: No.

[2] Q: Were you aware of any work going on
[3] related to Kennedy assassination materials during
[4] the 1973 period?

[5] A: Well, as I said before, when they were
[6] doing work on the Nix and Muchmore films for
[7] "Executive Action", that was in that period. But I
[8] wasn't working there at the time.

[9] Q: Including all copies of the Nix and
[10] Muchmore and Zapruder films, how many copies of
[11] those images, approximately, were you given by Mo
[12] Weitzman?

[13] A: I don't remember. I don't remember at
[14] all.

[15] Q: Could you give me an approximate number?
[16] Three, five, a dozen? Some kind of approximation?

[17] A: Possibly—everything relating to
[18] it—between a half a dozen and a dozen.

[19] Q: Is the number—again, approximately half a
[20] dozen to a dozen—were those given to you prior to
[21] 1973, or did you receive some of them after 1973?

[22] A: I— Again, I don't remember exactly. I

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[1] don't remember dates. I know there were some
[2] copies that he had given to me, and then taken
[3] back—asked for them back. And then they
[4] disappeared.

[5] Q: Approximately, when did he ask you to
[6] return them?

[7] A: I don't remember.

[8] Q: Approximately, how many did he ask you to
[9] return?

[10] A: I don't remember that, either.

[11] Q: Was it all of them?

[12] A: It may have been. He was approached by
[13] somebody, as I recall. Again, it's very foggy in
[14] my mind. But I think somebody wanted to look at
[15] them, or license them, or do something with them.
[16] And he had called me, and asked for them back. And
[17] I brought them back to him. And some of them
[18] disappeared, but I don't remember how many.

[19] He had some that he had not given me that
[20] also disappeared. Apparently, there was a move—
[21] When they moved from one area to another within the
[22] same building, some of them apparently disappeared.

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[1] But I wasn't working for him at that time.

[2] Q: Now, I had understood you earlier to
[3] say—and I may be incorrect on this—that you had
[4] never given back any earlier-generation originals
[5] that you had; that is, that you had kept them once
[6] you had them. More recently, you referred to
[7] returning these copies to Mo Weitzman.

[8] A: I think you asked me if I —

[9] Q: Could you help me straighten that out?

[10] A: I think you had asked me if I had ever
[11] sold any copies to anybody else, or distributed
[12] them to anybody else. And the answer to that is,
[13] no, I had not.

[14] But a great many of the things—especially
[15] dealing, as I recall, with the Nix film and
[16] Zapruder copies, because the work was done on the
[17] Zapruder film twice. It was done at some time in
[18] the 1960s, before I went to work for that company.
[19] At a previous company, it had been done. And then
[20] again in 1975, work was done again for CBS.

[21] And I remember that Mo had said that none
[22] of the—none of the early stuff—the negatives from

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[1] back in the '60s, when it was first done, were
[2] still there. He said he had stuff there. Some of
[3] the work was still there. Negatives,
[4] prints—something was still there. And when he
[5] looked for them, they weren't there anymore.

[6] And then he borrowed stuff back from me
[7] that he had given me. And some of that stuff, I
[8] did get back; and some of the stuff, I didn't.

[9] Q: Did you ever discuss with him in any way
[10] the existence of a 35 millimeter internegative made
[11] directly from the original Zapruder film?

[12] A: I don't recall specifically. I may have.
[13] I know that what he made originally—or what was
[14] made originally in the company he had been working
[15] for was an internegative.

[16] Q: Did he ever give you possession
[17] temporarily or permanently of a 35 millimeter
[18] negative made directly from the original Zapruder
[19] film?

[20] A: I don't believe so.

[21] Q: If he had given you a 35 millimeter
[22] negative made from the original Zapruder film,

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[1] would you be likely to remember his having given
[2] that to you?

[3] A: It may have been one of the things that he
[4] had given me that I had given back. There were
[5] many rolls of films—not all of which I went
[6] through, and certainly not all do I remember. I
[7] did give some of the stuff back to him, as I said.
[8] But I don't know what I got back, either. But I
[9] didn't get everything back.

[10] Q: Have you ever possessed a film related to
[11] the Kennedy assassination that would be more
[12] valuable than the 35 millimeter internegative made
[13] from the camera-original Zapruder film?

[14] A: I don't believe so.

[15] Q: Wouldn't it, then, be likely that if you
[16] had ever had possession of a 35 millimeter negative
[17] made directly from the Zapruder film, that you
[18] would remember having had possession of that
[19] negative?

[20] A: I probably would.

[21] Q: But you don't have any recollection of
[22] that now?

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[1] A: No.

[2] Q: Do you have any recollection of Mo
[3] Weitzman having made an interpositive from the
[4] 35 millimeter internegative?

[5] A: No.

[6] Q: You have no recollection of ever having
[7] had a copy of a 35 millimeter positive made from
[8] the 35 millimeter negative?

[9] A: No. I don't—I've never seen an
[10] interpositive of the Zapruder film. I don't think
[11] I have. There was one entity that CBS had, I know,
[12] that I think ended up being used by Oliver Stone in
[13] the movie "JFK". That may have been an
[14] interpositive, but I don't remember for sure.

[15] Q: When is the last time that you discussed
[16] films or images related to the Kennedy
[17] assassination with Mo Weitzman?

[18] A: It's been years. I don't remember exactly
[19] when.

[20] Q: Is this within a matter of two or three
[21] years, or more in the area of ten years?

[22] A: I'd say somewhere between the two. I know

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[1] the last time I went to see him is when my book

[2] "The Killing of a President" came out. And I
[3] brought a copy up to him at work, but he wasn't
[4] there. So, I left it for him. And as far as I
[5] know, I never spoke to him since.

[6] Q: In the preface to your book "Killing of a
[7] President", you make reference to Mo Weitzman. Do
[8] you recall that?

[9] A: Yes.

[10] Q: Why did you make reference to him in the
[11] preface to the book?

[12] A: I felt that he deserved credit. I thought
[13] that what he did, by allowing me to do the work,
[14] was a very generous and important historical thing.

[15] Q: By "the work", could you explain, as
[16] precisely as possible, what you mean by that—the
[17] work he allowed you to do?

[18] A: The optical enhancements. The
[19] stabilization techniques that I did.

[20] Q: Were you thanking him more for having
[21] provided the photographic facilities, or for having
[22] provided the original source, or both?

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[1] A: Probably both.

[2] Q: Did you ever attempt to license or sell
[3] Zapruder images that had been derived from sources
[4] provided by Mo Weitzman?

[5] A: To?

[6] Q: To anybody.

[7] A: Yeah. I would say he has, since he was
[8] the source for the original films when Oliver Stone
[9] wanted to use them. Actually, the thing with
[10] Oliver Stone, under the contract, is a technical
[11] advisor.

[12] When I showed them to "Goodnight,
[13] America", I didn't charge anything. I gave it
[14] away. I gave it away for virtually every time it's
[15] been shown on TV.

[16] Q: Was Mo Weitzman aware, to the best of your
[17] knowledge, that you had licensed images that you
[18] had derived from him?

[19] A: I don't think so. I don't know.

[20] Q: Is that something that, in the course of
[21] your relationship with Mo Weitzman, you should have
[22] disclosed to him; or is that not particularly

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[1] relevant for your relationship?

[2] A: I don't think so.

[3] Q: You don't think that it's not relevant?

[4] A: I don't think so. He had requested that I
[5] not mention the source for many years, before I
[6] revealed his name in the book.

[7] About a year before that time, I had asked
[8] him. I told him that I wanted to be able to give
[9] credit where it was due for making the images
[10] available for history. And he said, at that time,
[11] that he didn't mind if I did.

[12] Q: Do you have any understanding right now as
[13] to what images Mo Weitzman possesses related to the
[14] Kennedy assassination?

[15] A: I don't know if he has any at this stage.

[16] Q: Are you in contact, as far as you know,
[17] with anybody who has an ongoing relationship with
[18] Mo Weitzman?

[19] A: No.

[20] Q: Could you look at Exhibit 5, and tell me
[21] if it—if you have any recollection of whether you
[22] may have prepared the resume for the House Select

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[1] Committee on Assassinations?

[2] A: I really don't remember. '75 to present.
[3] It doesn't say when "present" was. It could have
[4] been for anybody. I really don't know. As I said,
[5] I don't remember preparing it. But it is accurate.
[6] At least, it seems to be. I don't doubt that I
[7] prepared it.

[8] Q: Have you ever visited the firm called
[9] Manhattan Effects?

[10] A: No.

[11] Q: Are you acquainted with the firm called
[12] Eastern Optical Effects?

[13] A: I believe the Eastern Optical Effects was
[14] one of the previous names of the company, prior the
[15] EFX Unlimited being formed. And it's
[16] possible—it's possible that there is another
[17] entity using that name now.

[18] Q: Do you know whether Mo Weitzman worked for
[19] a firm called Eastern Optical Effects?

[20] A: I think he did.

[21] Q: Do you know where Mo Weitzman works now?

[22] A: No.

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[1] Q: Have you ever heard any information about
[2] any Kennedy assassination related material being in
[3] the possession of a company called Eastern Optical
[4] Effects?

[5] A: If Eastern Optical Effects was the name of
[6] the company that did the work initially for Life
[7] magazine, then, yes. If not, then, no. It could
[8] have been Eastern. It could have been Manhattan,
[9] as you mentioned before. I don't know. I wasn't
[10] there.

[11] Q: Are you aware of any other New York labs,
[12] in addition to those that we have mentioned so far
[13] today, that did work related to the photographic
[14] record of the Kennedy assassination?

[15] A: One called Huemark. I believe they were
[16] the ones who did the Zapruder copies for the
[17] Garrison investigation, if I'm not mistaken.

[18] Q: Did you, yourself, ever visit Huemark?

[19] A: I don't think so. They're an eight
[20] millimeter print house.

[21] Q: Were you aware of any other labs in
[22] New York that did work related to the Kennedy

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[1] assassination?

[2] A: I don't think so.

[3] Q: Have you ever seen any Kennedy
[4] assassination related films at any other labs,
[5] beyond those that we've already discussed?

[6] A: Let me back up. When you say "labs", you
[7] mean processing laboratories, or optical effects
[8] houses, or —

[9] Q: Anything. Any kind of lab that has to do
[10] with photography, films.

[11] A: I had a phone call once from a fellow who
[12] said he worked at a company called TVC Lab, which
[13] used to be on 43rd Street. I don't know if they
[14] still are. And he attempted to sell me a copy of
[15] my own film, actually. He didn't —

[16] Q: Did you buy it?

[17] A: No. But he didn't know that it was mine.
[18] What happened was, he ran illicit prints off of the
[19] optical work that I was doing without the knowledge
[20] of his employers.

[21] He had been fired, and he was looking to
[22] make some money. He saw me on a television show,

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[1] and he attempted to sell my own film back to me.

[2] But I don't know the guy's name.

[3] Q: Are you aware of any other labs anywhere
[4] in the country that have done work related to the
[5] Kennedy assassination?

[6] A: Well, there is an optical house in
[7] California that did the work for Oliver Stone for
[8] "JFK". And they also did work on "Forrest Gump"
[9] for the motorcade footage. And, possibly, the same
[10] lab might have done the stuff for "Ruby"—the movie
[11] "Ruby". I think so.

[12] Q: Other than for commercial films—that is,
[13] motion pictures—are you aware of any other labs
[14] that have done work on Kennedy assassination
[15] photographs or films?

[16] A: I don't think so.

[17] Q: Have you ever been a plaintiff or a
[18] defendant in any lawsuit related to the Kennedy
[19] assassination or photographs related to the Kennedy
[20] assassination?

[21] A: A plaintiff in a lawsuit?

[22] Q: Plaintiff or defendant.

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[1] A: I've been a—I'm a plaintiff in New York
[2] against my former co-author, Harrison Livingstone.
[3] He used materials that he got from me without my
[4] permission.

[5] Q: Very briefly, what is the current status
[6] of the case involving Harry Livingstone?

[7] A: That is still pending. It's been put off
[8] till October.

[9] Q: The trial has been put off till October?

[10] A: Yeah.

[11] Q: Are there any other lawsuits?

[12] A: Well, there's two separate suits there,
[13] for two separate books. One is a libel
[14] action—straight libel, not relating to the actual
[15] use of materials.

[16] Q: And what is the one that is not a libel
[17] suit?

[18] A: Well, there's libel in both suits. But
[19] the first one is for "High Treason 2", and the
[20] second one is for "Killing the Truth".

[21] Q: I assume that "Killing the Truth" is a
[22] counter suit—or, no, I'm sorry. "Killing the

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[1] Truth" is a separate suit that you filed against

[2] Mr. Livingstone?

[3] A: Yes.

[4] Q: Have those two suits been consolidated?

[5] A: His attorney requested the second suit,
[6] which was originally filed in Philadelphia, to be
[7] taken to New York for the purpose of consolidating
[8] them. But once he got it moved away, he never made
[9] a motion to consolidate them. So, they have not
[10] been, unless they have been without my knowing it.

[11] Q: Is the second lawsuit scheduled—slated
[12] for trial?

[13] A: As far as I know, the judge has got them
[14] on—for both at the same time, or pretty close to
[15] the same time.

[16] Q: So, it's the same judge for both cases?

[17] A: Yes.

[18] Q: Are you a plaintiff or defendant in any
[19] other lawsuit?

[20] A: Livingstone made some illicit moves
[21] against two of my children—some rather disgusting
[22] moves against two of my children. And when I found

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[1] out he was doing it to other kids, I let the people
[2] know that it was not a unique situation; that he
[3] had done it before.

[4] And because I had mentioned what he had
[5] done, he filed a \$5 million counter lawsuit against
[6] me—or \$2 million, or whatever, some ridiculous
[7] number—for simply explaining what actually did
[8] happen.

[9] So, I don't know that that relates to it,
[10] except for the fact that it's just a maneuver on
[11] his part to try to get me to drop my suit.

[12] Q: Have you ever been a plaintiff or a
[13] defendant in any other lawsuit related to the
[14] Kennedy assassination or photographic record of the
[15] Kennedy assassination?

[16] A: I don't think I have. I'm not— It's
[17] possible. I just don't really think so. I have no
[18] memory of it, if I was.

[19] As I explained to you when I came in
[20] before, I've had seven strokes. And there's parts
[21] of my memory that I just—you know, I'll go in an
[22] area, and just all of a sudden I'll hit a blank

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[1] wall. I don't believe I have been, no.

[2] Q: Have you been engaged in— Let me withdraw
[3] that. Have you ever been engaged in any legal
[4] disputes that may not have risen to the level of
[5] filing a suit, with respect to issues relating to
[6] photographs related to the Kennedy assassination?

[7] A: There is an attorney in Houston who has
[8] decided to make a career out of finding people to
[9] sue me. He has found four people so far; three
[10] relating to my videotapes, and one relating to a
[11] misprint that the editor put into the book "The
[12] Killing of a President".

[13] There was a caption in the book that the
[14] editor had put in, and that another editor edited
[15] down—to make it fit, to square it off—and changed
[16] the meaning. And by changing the meaning, it made
[17] it look as if I didn't trust the testimony of the
[18] witness. And, in fact, I've been the strongest
[19] supporter this witness ever had.

[20] But because of the misprint, they smelled
[21] money, and they sued. Settled for \$12,000. Again,
[22] it was a frivolous lawsuit. It was without any

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[1] basis in fact. I didn't even write the words, in
[2] the first place. But it would have been so
[3] expensive to defend the case that the publisher
[4] settled.

[5] The same lawyer went to three people whose
[6] films I had used in "The Assassination Film"
[7] videotape. Two of them, I had permission from.
[8] The third, I had done a lot of work for for free
[9] and could not find her, because this was years
[10] later.

[11] Q: Who was that?

[12] A: Well, the one who I couldn't find was Tina
[13] Barnes. She remarried, changed her name, moved to
[14] a different city, and I couldn't find her. People
[15] that I knew that knew her couldn't find her.
[16] People that had known her for years couldn't find
[17] her.

[18] And since I had done so much work for her,
[19] I didn't think that she'd mind if I just put it in
[20] there. It's just a researcher's video, anyway, and
[21] is not sold in stores at all.

[22] The other two were Paschell— The Paschell

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[1] film. Paschell had an agent named Mark Oaks. I

[2] had his permission before I ever did it.

[3] And the third one was Charles Bronson. I
[4] had permission to use the Bronson film from his own
[5] attorney. And it was cleared with him before I
[6] ever put it in there. Now he's dead, and this
[7] attorney in Houston has got his wife to make this
[8] complaint against me.

[9] So, those— Although they're not actual
[10] suits—they have not risen to that point, as you
[11] phrased it before—they still exist.

[12] Q: In the lawsuit with Harry Livingstone,
[13] were you required to make available to Mr.
[14] Livingstone and his counsel any photographic
[15] imagery related to the Kennedy assassination?

[16] A: There were— Yes. There's some of the
[17] Zapruder frames that had been used in the LA Free
[18] Press special edition, and individual frames that
[19] were being distributed through the Assassination
[20] Information Bureau some years ago. Those were the
[21] images that Livingstone had lifted from me and put
[22] into this book.

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[1] MR. GUNN: We'll take a short break.

[2] [Recess.]

[3] MR. GUNN: Okay. Back on the record.

[4] BY MR. GUNN:

[5] Q: Mr. Groden, I'd like to show you a film
[6] that appears to be called "The Assassination Film",
[7] and ask you whether you have had any role in the
[8] preparation of that videotape.

[9] A: Yep, produced it.

[10] Q: And you are the Robert J. Groden who's
[11] photographed on the back, and the director of the
[12] film?

[13] A: Yes, that silly photograph is me.

[14] Q: Towards the beginning of the film—and we
[15] can play part of it on the television that we have
[16] here in the room, if you would like—I recorded you
[17] as having stated this part of a phrase: "since the
[18] films"—presumably, in the videotape—"are
[19] unavailable anywhere else".

[20] Do you recall having said something of
[21] this sort, "since the films are unavailable
[22] anywhere else"?

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[1] A: I seem to remember something like that.
[2] Probably some of the films, perhaps not all of
[3] them. In many cases, since they're optical
[4] versions that I created, they aren't available
[5] anywhere else.
[6] Q: So, you did not mean to say that all of
[7] the films were not available anywhere else?
[8] A: No.
[9] Q: Did you mean to say that the versions that
[10] are presented here are better versions than are
[11] available anywhere else?
[12] A: In many cases, yes. In some cases, I
[13] don't know. If original films could be found and
[14] transferred directly—using today's
[15] technology—digitally onto tape, they could be of
[16] conceivably better quality; yes.
[17] Q: Were any of the tapes— Let me withdraw
[18] that. Were any of the images that you brought
[19] today to the deposition transferred onto digital
[20] tape by you?
[21] A: Well, I had them done. I didn't do it
[22] myself, but it was done. Yes.

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[1] Q: Have they all been transferred to digital
[2] tape?
[3] A: Yes.
[4] Q: Were are the digital tapes?
[5] A: They are archived in the—in a vault in a
[6] professional lab. I don't have those.
[7] Q: Are you the owner of those tapes?
[8] A: Yes.
[9] Q: Were those digital tapes used to produce
[10] the film "The Assassination Films"?
[11] A: Yes. Well, all except for a few. There
[12] were a few scenes that came from other sources, but
[13] the vast majority came from those.
[14] Q: Did you make any of the digital tapes from
[15] sources other than those that you brought here
[16] today?
[17] A: Yes, the optical effects versions that you
[18] told me weren't necessary to bring.
[19] Q: And just so that we're clear here, an
[20] example of one of the optical effects would have
[21] been a version of the Zapruder film that was
[22] Grodenscoped. Would that be right?

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[1] A: That's correct.
[2] Q: But in terms of the original source films,
[3] you did not— In terms of the original source
[4] films, did you use any digital versions from
[5] sources other than those that you brought here
[6] today?
[7] A: Again, there's different footages—other
[8] versions that I did not bring today. Say, optical
[9] rotoscopes of Governor Connally and like that.
[10] Yeah, those are the ones—all those were digitally
[11] transferred and are used on the film—on the tape.
[12] Q: Well, I don't mean to suggest anything
[13] that was enhanced. I'm not asking questions —
[14] A: Oh, okay.
[15] Q: — about anything that was enhanced, or
[16] enlarged, or deblurred, or Grodenscoped. Anything
[17] of that sort isn't the question.
[18] But just in terms of the original source
[19] films, did you use any original sources, other than
[20] those that you brought here today, for the
[21] preparation of your video?
[22] A: I don't believe so.

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[1] Q: My concern is, when you say you don't
[2] believe so, is there a possibility that there is
[3] some source that you used other than the films that
[4] you brought here today?
[5] A: Again, I don't think so. If I have two or
[6] three identical prints of the Hughes film, for
[7] instance, I don't know which one I would have used.
[8] The one that says "original"—which I
[9] brought—is the one that I'm convinced I would have
[10] used. It wouldn't have made sense to spend the
[11] time and money to use a lesser version. So, I
[12] would say that I used the same ones.
[13] Q: Is it possible that a digital version of
[14] the films would have a better quality than the
[15] source films from which they were taken?
[16] A: Clarity would be identical. Color
[17] correction would be considerably better on the
[18] digital. You can tell. When you compare those to
[19] this videotape, you'll see the difference, because
[20] the videotapes were color corrected, where the
[21] films have faded tremendously.
[22] One thing to remember, though, is that the

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[1] digital copies were made over the last 10, 12, 15
[2] years and are not new—are not current now.
[3] Whereas, the films have continued to degrade
[4] through the years.
[5] Q: Would it be the case that, in terms of
[6] focus, the digital versions would be no more
[7] precise or sharp than the originals from which they
[8] were taken?
[9] A: They should be identical. That's the
[10] purpose of digital. They should be identical.
[11] Q: Other than color correction on the digital
[12] tapes, did you do any other—take any other steps
[13] to alter either the sharpness of focus or images?
[14] A: Slow motion, freeze frame, adding circles
[15] to highlight specific issues I'm trying to point
[16] out. Those things, yes.
[17] Q: But in terms of focusing or sharpness,
[18] deblurring—
[19] A: Oh, no.
[20] Q: — you didn't do that?
[21] A: That would be the same.
[22] Q: Okay.

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[1] A: It is not possible to legitimately focus
[2] something that's out of focus. It can't be done.
[3] You can use a process called image
[4] deblurring, but it's—the computer hypothesizes
[5] what it wants to see. And I have always stayed
[6] clear of that, because then you're altering the
[7] photographic image, rather than presenting the
[8] evidence. So, I've never dealt with that.
[9] Q: In the videotape, you refer—as I have it
[10] written in my notes—to one of the tapes being a
[11] pristine copy. What did you mean by "a pristine
[12] copy"?
[13] And, again, I have the tape, if you would
[14] like to make reference.
[15] A: Just that it was very clean. That it
[16] wasn't full of scratches and dirt.
[17] Q: You were referring to the tape that you
[18] brought in today; is that correct—when you
[19] referred to the pristine copy?
[20] A: To the film I brought in today?
[21] Q: To the film you brought in today.
[22] A: Yes. You said "tape".

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[1] Q: Oh, I'm sorry. You also state that the
[2] copy was "made directly from the original film".
[3] Is that an accurate statement in the videotape?
[4] A: Directly from— Well, by way of the
[5] negative, yeah. But it was not—it was not a
[6] first-generation copy. But it wasn't made, say,
[7] from going through multiple generations and
[8] changes. In other words, there wasn't alteration
[9] to the film in any way.
[10] Q: I'm a little bit confused about what it
[11] means, then, to say "made directly from the
[12] original film".
[13] A: Well, theoretically, you know, you could
[14] imply that to believe that it came directly from
[15] the original eight millimeter to the tape transfer.
[16] If that's what—if that was the inference, then,
[17] it's wrong. I didn't mean to say that, and I
[18] didn't mean to imply that.
[19] Q: So, what you meant to imply, then, is that
[20] your version of the tape was taken from a negative
[21] which was, in fact, taken from the original
[22] camera—from the camera original; is that correct?

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[1] A: Either from a print from the negative or
[2] from a reversal copy—an Ektachrome copy.
[3] Q: Just so I'm clear, how many generations
[4] were there between the version that was your source
[5] material for the videotape and the original camera-original
[6] Zapruder film?
[7] A: Probably two generations.
[8] Q: And what were the generations? If you
[9] can, describe what the source was that you had for
[10] your version.
[11] A: Negative and print. But, then, those
[12] transfers were done so many years ago, and there's
[13] no notes. So, I'm not really clear which
[14] copy—which particular copy was used for any
[15] particular version. The Secret Service version, I
[16] know that came definitely from this particular
[17] copy.
[18] This— Again, there are several copies on
[19] this roll that I gave you today—the one that's on
[20] the reel. I don't know which one of those copies
[21] was used, but they're all on there.
[22] Q: Well, the thing that is holding me up is

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[1] just the words, again, "made directly from the
[2] original film"—which would imply either that it
[3] was made from the camera-original film, or that it
[4] was made from a negative that was, in turn, made
[5] from the original film.

[6] A: Well —

[7] Q: Would those be wrong inferences for me to
[8] draw?

[9] A: Yeah, because it wasn't made from a
[10] negative image. It was made from a positive image.
[11] So, it would have been a print made from a negative
[12] made directly from the original film.

[13] Q: Well, is it misleading to say that it's
[14] made directly from the original film—in the video,
[15] when you say that?

[16] A: If it's interpreted that way, then, it
[17] would be— It wasn't meant to be misleading, but
[18] the inference would be wrong.

[19] What was meant by it was—is that there is
[20] no stretch framing, no Grodenscoping on it, no
[21] alteration to it; that it's a direct copy of the
[22] original with no changes, with no alternations.

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[1] Q: Well, that would be true for many versions
[2] of the Zapruder film, then; wouldn't it—if it's
[3] from the original —

[4] A: Yeah.

[5] Q: — film, if that's all you meant to say?

[6] A: Yeah. But I've seen copies on TV made
[7] from the original that are rather muddy. They're
[8] not clear.

[9] The original film, before the Archives got
[10] it, was not cared for. There was mold growing on
[11] it. As I recall, there's actually a footprint on
[12] it. I actually remember seeing a footprint on a
[13] section of the film. It was cut twice, in the 150s
[14] and again at 207. There were torn frames. The
[15] picture was jumpy.

[16] This particular copy is very clean. And
[17] that's what the impression—that's what I meant to
[18] imply when I said that.

[19] I don't know if you can tell when you
[20] listen to the narration on it, I was extremely
[21] tired. I was doing this late at night, night after
[22] night. And I couldn't—many times, I just couldn't

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[1] even keep my eyes open.

[2] And there was no script for it. I was
[3] just—I would look at the film, and I'd write in my
[4] mind what I meant to say. And I would do that.
[5] And, again, the narration of this I did very soon
[6] after I had the strokes.

[7] So, there's certainly no intentional
[8] misleading of anybody. I didn't mean to say that
[9] it was made from the original film—that is, the
[10] camera original. That was not implied.

[11] Q: Okay. Later in the videotape—and, again,
[12] we have it here, and we can play it—you refer to
[13] the Orville Nix film. And you say, as I wrote
[14] down—or you say, it is "the only known copy made
[15] directly from the original".

[16] Is that statement accurate?

[17] A: As far as I know, it is. The other copies
[18] that existed came through internegatives or
[19] duplicate copies. And they're a bit fuzzier, and
[20] they don't have the detail in the darker areas—in
[21] the shadow areas.

[22] Q: Did you also have access to a copy

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[1] negative for the Nix film?

[2] A: Yes.

[3] Q: And how did you get access to the copy
[4] negative?

[5] A: The copy negative was sent to me from
[6] California by David Lifton. He was working with
[7] the producers of the movie "Executive Action". And
[8] he sent me a copy from there—at that end.

[9] Q: Do you know—or did you ever discuss with
[10] David Lifton where he obtained the copy negative of
[11] the Nix film?

[12] A: I don't believe so. It's possible that it
[13] was implied or even said. Remember, we're going
[14] back to 1973. So, that's like 23 years ago.

[15] He may have said where he got it from. I
[16] don't know. I don't remember. The implication, as
[17] I recall, was—my impression was that he got it
[18] from the producers.

[19] Q: Did you return the copy negative to David
[20] Lifton?

[21] A: It wasn't a negative. It was a print.

[22] Q: So, you had a print of the copy negative?

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[1] A: Right. That was two generations later
[2] than the one I gave you today.
[3] MR. GUNN: Let's go off the record.
[4] [Discussion off the record.]
[5] MR. GUNN: We are now going to suspend the
[6] deposition until we can work out a time that will
[7] be mutually convenient for Mr. Groden and for the
[8] Review Board. And we will continue the deposition
[9] at a place that will be convenient for Mr. Groden,
[10] either in the Philadelphia area or in the Dallas
[11] area when he moves there.
[12] Thank you very much. Appreciate it.
[13] THE WITNESS: Thank you.
[14] [Whereupon, at 4:30 p.m., the taking of
[15] the deposition concluded.]
[16] [Signature not waived.]
[17]

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[1] CERTIFICATE OF DEPONENT
[2]
[3] I have read the foregoing pages, which
[4] contain the correct transcript of the answers made
[5] by me to the questions therein recorded.
[6]
[7] Robert J. Groden
[8]
[9]
[10]
[11]
[12] Subscribed and sworn to before me this
[13] _____ day of _____
[14]
[15]
[16] Notary Public in and for
[17]
[18] My commission expires
[19]

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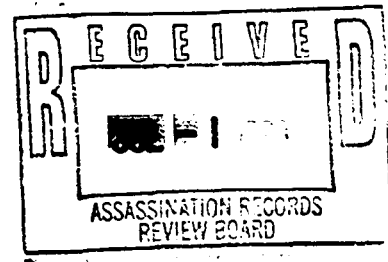
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Lawyer's Notes

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February 22, 1998

Jeremy Gunn
General Counsel
Assassination Records Review Board
600 E Street, N.W., Second Floor
Washington, D.C. 20530

Subject: Notes and corrections for my depositions for the ARRB.

Global replace - "EFX Unlimited" not "Effects Unlimited"

Global replace - "Reibe" not "Reiby"

Global replace - "matte " not "mat"

Global replace - "Lupe" not "loupe"

Global replace - "Gayle" not "Gail"

Global replace - "Ektachrome" not "Ectachrome"

Page/Line Change/Correction

8-18 correction: I have seen the Secret Service copy. The HSCA people told me that it was the Secret Services original duplicate copy.

8-21 cut: "the".

9-10 cut: "It's very--"

13-9 Weissburg to Weisberg.

15-18/19 cut: black and white

45-8/9 NOTE: The film actually came to me via Mo Weitzman at EFX Unlimited and not from Orville Nix. The statement at 46-6 is correct. (See 236-4 thru 20)

89-13 "film" should be "videotape program"

145-13 "TVC" not "TBC"

148-14 "got" not "get"

197-17 "were" not "was"

197-20 "possession" not "position"

206-12 "the liquid" not "it"

221-25 and 222-1 "d-Max" not "D max"

229-14,15 "from "Best Evidence" not "From the Best Evidence"

236-4 thru 20 NOTE: I do not believe that I said that. If I did, it was a mistake. If you examine the statement at page 46-6 (the very next page) the statement there is correct. (See 45-8/9)

238-3/9 "Wakeford-Orloff" not "Wakeford Arloff"

246-3 "contrasty" not "contrasting"

262-12 ...which is when you...

263-5 "Cinelab" not "Cine Lab"

To the best of my knowledge, the above corrections are accurate and with these corrections, the transcript of my testimony is true and correct.



Robert J. Groden

TRANSCRIPT OF PROCEEDINGS
ASSASSINATION RECORDS REVIEW BOARD

----- X
:
In re: :
:
PRESIDENT JOHN F. KENNEDY :
:
----- X

Deposition of
ROBERT J. GRODEN
Volume II

Pages 169 through 277

Dallas, Texas
August 20, 1996

COPY

1 ANSWERS AND DEPOSITION OF ROBERT J.

2 GRODEN, produced as a witness at the instance of
3 the Assassination Records Review Board, taken on
4 the 20th day of, 1996, at 9:12 a.m., before Jill
5 Johnson, a Certified Shorthand Reporter in and for
6 the State of Texas, at the offices of the United
7 States Attorney, Third Floor, 1100 Commerce
8 Street, in the City of Dallas, County of Dallas,
9 State of Texas, pursuant to subpoena.

10
11
12
13
14 A P P E A R A N C E S

15
16 MR. T. JEREMY GUNN
17 General Counsel
18 Associate Director for Research and Analysis
19 Assassination Records Review Board
20 600 E Street NW
21 2nd Floor
22 Washington, DC 20530
23 (202) 724-0088
24
25

I N D E X

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EXHIBITS PAGE

1 Subpoena 184

2 6/26/96 letter modifying
subpoena 1846 8/8/96 letter from Gunn to
Grodan 1737 Nix Release of WTN, signed
4/5/93 255

8 6/28/91 receipt for materials 255

1 ROBERT J. GRODEN,
2 being cautioned and sworn to tell the truth, the
3 whole truth and nothing but the truth, testified
4 on his oath as follows:

5 CONTINUED EXAMINATION

6 BY MR. GUNN:

7 Q. I'll state for the record that this is a
8 continuation of the deposition of Mr. Robert
9 Groden, which was first taken on July 2nd, 1996.

10 Mr. Groden, do you understand that you
11 are testifying subject to the federal perjury
12 statute?

13 A. Yes.

14 Q. And is there any reason as you are
15 sitting here today that you are unable to tell the
16 truth, the whole truth and nothing but the truth
17 in respect to photographic materials related to
18 the assassination of President Kennedy?

19 A. No, although I must -- I must state, if
20 I can, for the record that I received the letter
21 telling me about this meeting today on Saturday,
22 which was two days ago. And there is in fact a
23 paragraph from here I'd like to read into the
24 record, if I may. And that is, "Based upon our
25 review of your deposition on the facts that we

1 have independently gathered, I suggest that you
2 may wish to reconsider your earlier decision not
3 to retain counsel to represent you."

4 Considering the fact that this came
5 Saturday, I got it at the end of the day -- or got
6 it middle -- midday, and the fact that Sunday
7 attorneys are not available and I was out of town
8 yesterday, I have not had a chance to retain an
9 attorney nor have I had a chance to discuss this
10 with a criminal attorney. And I am appearing here
11 today under those circumstances.

12 You and I spoke last night, Mr. Gunn,
13 and I have decided to go ahead and speak anyway.
14 However, I find -- I find that paragraph to be
15 somewhat threatening and I do -- I would like to --
16 to find counsel for this. However, I will go
17 ahead and -- and answer the questions today
18 anyway.

19 Q. Well, let's make sure that we are very
20 clear about what's going on here. First I'd like
21 to ask the reporter to mark a document as Exhibit
22 6 to this deposition.

23 [Exhibit 6 marked.]

24 Q. I'd like to show the document to you,
25 Mr. Groden, and ask you if that is a photocopy of

1 the document that you received in the mail.

2 A. Yes, it is.

3 Q. I'll state for the record that the
4 document is dated August 8th, 1996. I will also
5 state for the record that that was the date on
6 which the letter, including a transcript of the
7 first day of your deposition, was mailed to you.
8 It is my understanding through persons in my
9 office that several calls were made in an attempt
10 to contact you to notify you that the package had
11 been sent and was available at the post office. I
12 also understand that you were not able to pick up
13 that package until last Saturday.

14 A. May I add that I only received one phone
15 call and that was on Friday. The call was made
16 Friday. It's still the only one I received and it
17 is on my answering machine still. And it was a
18 notification that it was there at the station. I
19 received that phone call -- the phone call was
20 made at about 11:00 clock in the morning Central
21 Standard Time, about noon Eastern Standard Time.
22 I did not receive that call until after midnight
23 because when I got home I found it on my voice
24 mail. It is the only time I found out that that
25 was there.

1 Q. The other calls that had been made were
2 to the post office to make sure that you had
3 received this, that you had received
4 notification. So the other calls to which I was
5 referring were to the post office advising them.
6 There was initially an error in the address, as
7 you can see.

8 A. I see. That would have held it up.

9 Q. And that's why the calls were made to
10 the post office, to make sure that you were
11 notified of that.

12 A. Okay.

13 Q. With respect to this letter, so that --
14 so that we are all clear on this, this letter, as
15 previously, invites you to obtain counsel, to
16 which you have a right, and to which, if you wish
17 to retain counsel, we can close this deposition
18 now and reconvene later when you've had an
19 opportunity to retain counsel.

20 The paragraph to which you referred,
21 which I believe you called threatening, is simply
22 designed to advise you of this particular right
23 and it suggests that you may wish to consider it.
24 That offer is ongoing, and if you wish to retain
25 counsel, we can conclude for now and you can

1 obtain counsel.

2 A. Well --

3 Q. It's your choice.

4 A. Again, since you've come this long
5 distance to do this and I'm anxious to get this
6 over with and completed, I will go ahead. But I
7 would like to retain the right, depending on how
8 things go. As I said, I find -- I find the
9 wording of that sentence extremely -- extremely
10 threatening.

11 There was also I noticed in the
12 transcript that you allowed me to read, there --
13 it was a -- as I recall, there was a statement I
14 had made toward the beginning of my testimony, or
15 perhaps it was to you before the beginning of the
16 testimony, and I didn't see it in there. You said
17 that there are two references to it. I just read
18 this yesterday and I remember only one. And that
19 reference is to an accident that I had about two
20 and a half years ago where I suffered severe head
21 trauma and, as a result of that trauma, had seven
22 strokes. And it does severely affect my memory.
23 There is an ongoing medical record of this.

24 I would just like to have it in the
25 record that if indeed there is a mistake made in

1 my testimony because of that, I apologize for it.
2 But I don't believe that that would be the case.
3 If I don't remember exactly, I will just say I
4 don't remember.

5 I have every intention of complying and
6 answering every question as fully and truthfully
7 as I can. I just wanted it in the record that
8 that in fact is the situation, and that's that.

9 Q. You mentioned a moment ago that you had
10 an opportunity to read the transcript.

11 A. Yes.

12 Q. In reading the transcript, did you
13 discover any errors to which you would like to
14 draw my attention?

15 A. There are a great many. I marked them
16 on -- in the record. Probably, I guess, 30, 40,
17 50 errors. Nothing really major. The only thing
18 that I found that -- and I remember since that
19 time that is actually an error in the testimony
20 itself is you had asked me if I had ever sold
21 copies of anything, early generation copies to
22 anybody and I had said no. And I had forgotten
23 about it. I had in fact sold a 35 millimeter
24 original print to LFP Productions in California.

25 Q. A 35 millimeter original print of --

1 A. Of the Zapruder film.

2 Q. Where did you obtain the 35 millimeter
3 print that you sold?

4 A. From Mo Weitzman. As I recall.

5 Q. Approximately when did you obtain that
6 35 millimeter film from Mr. Weitzman?

7 A. As I recall, 1969 or 1970, I believe.

8 Q. Do you retain any copy, whether
9 digitalized or not digitalized, of that 35
10 millimeter print to which you just referred?

11 A. I don't know. There were -- there were
12 videotape copies made of it, as I recall, before I
13 sold it. So it would be on videotape, which you
14 have copies of. You have copies of all the stuff
15 I have on videotape. You had independently
16 purchased them.

17 Q. You're referring to your commercially
18 sold videotapes?

19 A. Yes. That is correct.

20 Q. Did you use the 35 millimeter film to
21 which you just referred in any way for the
22 production of your commercial videotapes?

23 A. I believe so. I do believe that that
24 was the source of the 35 millimeter original
25 transfer that was done digitally back in, oh,

1 gosh, back in the 1970s.

2 Q. So in other words, would it be fair to
3 say that the 16 millimeter versions of the
4 Zapruder film that you brought to the original
5 deposition were not in fact the source -- let me
6 withdraw the question and begin again.

7 In your original deposition you brought
8 two 16 millimeter copies of the Zapruder film; is
9 that correct?

10 A. That is correct.

11 Q. One of them we referred to as the Secret
12 Service copy, which was an uncut version; is that
13 correct?

14 A. That is correct.

15 Q. The other version, if we could refer to
16 it as the Life version, had splices in it; is that
17 correct?

18 A. That is correct.

19 Q. Would it be fair to say now that you did
20 not use the 16 millimeter Life version as the
21 version -- as the, excuse me, as the source for
22 your commercially available videotapes?

23 A. Actually I believe I used them both.

24 Q. Did you make a digitalized version of
25 the 35 millimeter film prior to the time that you

1 sold it to LFP Productions?

2 A. I believe I did.

3 Q. So then you did retain a copy of the 35
4 millimeter film; is that correct?

5 A. On videotape, yes.

6 Q. For the copy of the 35 millimeter that
7 you retained on videotape, where is your earliest
8 generation copy of that 35 millimeter tape?

9 A. They are archived right now. All of
10 those materials are archived.

11 Q. Where are they archived?

12 A. They're archived with Allied Film here
13 in Dallas.

14 Q. When were they archived at Allied Film
15 in Dallas?

16 A. I don't know.

17 Q. Approximately?

18 A. I don't really remember. I would say
19 the final time they were used and rearchived would
20 have been, I guess, last -- last September or
21 October perhaps, sometime around that point.
22 Prior to that they had been for years archived at --
23 oh, gosh. What was the name of -- Video Post.

24 Q. Where is Video Post?

25 A. They are here in Dallas.

1 Q. Other than Allied Film and Video Post,
2 have you ever archived any materials related to
3 the assassination of President Kennedy in any
4 other commercial storage or archival facility?

5 A. No.

6 Q. Have you ever archived any images
7 related to the assassination of President Kennedy
8 other than digitalized videotapes?

9 A. I'm not sure I understand the question.
10 Have I -- have I ever archived them, except on
11 videotape like that?

12 Q. Let me withdraw the question and ask it
13 again.

14 What materials do you have archived in
15 Allied Film?

16 A. The master tapes for my two videos and
17 the source material, the source transfer videos.

18 Q. What do you mean by the source transfer
19 videos?

20 A. When I had the films years and years
21 ago, before they -- they had already started to
22 fade. You know, they're on very, very old print
23 film and the print colors have faded. They become
24 very red. They're virtually indistinguishable
25 now. Virtually every color looks red, no matter

1 what, even the grass. And the transfers that were
2 made back in the 1970s are the only ones that
3 retained any true color. So what I had done is I
4 had transferred the films to dig- -- to videotape
5 and they were color corrected at the time onto
6 tape. Those are the source materials that are
7 archived at this time at Allied.

8 Q. Are those videotapes digitalized?

9 A. Yes.

10 Q. What --

11 A. At least I believe -- I believe they're
12 all digitized. Some may be analog but I think
13 they're all digital.

14 Q. Did you ever make a digitized version of
15 any original film related to the assassination of
16 President Kennedy?

17 A. All of them. I believe all of them.
18 All the ones that were relevant to the -- to my
19 videotapes.

20 Q. Did you ever make digitized versions of
21 the camera original films?

22 A. No. No. They were eight millimeter.
23 And the place where I had it done did not have the
24 capability of doing it from eight millimeter.
25 Those were all done from eight millimeter to 16

1 millimeter in New York City and there was no
2 digitization at all. That's film to film.
3 Digitization only refers to tape.

4 Q. Would it be fair to say then that at
5 Allied Film you have never stored any materials
6 other than videotapes?

7 A. As far as I know. I may -- I may have
8 stored films there while they were being
9 transferred. I don't remember that. It's
10 possible. But to the best of my knowledge, the
11 only things I ever stored there were the
12 videotapes.

13 Q. When you say films may have been stored
14 there while they were being transferred --

15 A. Yeah.

16 Q. -- what do you mean by that?

17 A. Well, they wouldn't have been stored at
18 Allied. They would have been at Video Post,
19 because that's where the transfer work was done.
20 There was a time when the sixth floor people, the
21 Sixth Floor Museum in the former Texas School Book
22 Depository, they licensed copies of my films from
23 me for the sixth floor, transfers for their own
24 tapes or laser disks. And we did those transfers,
25 as I recall, at -- yes, we did, at Video Post.

1 Now, that took several days. As I recall -- I
2 don't remember, but as I recall, I may have stored
3 the videotapes there while the transfers were -- I
4 mean the films there while the tapes were being
5 made.

6 Q. Of the films that you may have stored
7 there, did you have any films other than those
8 that you provided to us at the former deposition?

9 A. There may have been some newsreel
10 footage of the motorcade, black and white copies
11 of the newsreel footage. But nothing in the way
12 of originals or Dealey Plaza footage, that I'm
13 aware of.

14 Q. Other than newsreels that you just made
15 reference to, did you bring to your July 2nd
16 deposition all of the other films that were used
17 to make your videotapes?

18 A. As far as I know, yes, with the
19 exception of the DCA film and the Atkins film.

20 Q. I would like to show you two documents
21 which previously have been marked Exhibits 1 and 2
22 to this deposition. I'll ask you if those look
23 familiar.

24 I'll state for the record that Exhibit 1
25 is a subpoena issued to Mr. Groden and Number 2 is

1 a letter dated June 26th, 1996 that modifies the
2 terms of the original subpoena.

3 A. They do appear to be, yes.

4 Q. And I'd like to ask you whether you
5 brought any additional films or images with you to
6 this deposition today.

7 A. Yes. The DCA film, which was the only
8 thing that was left over from the other day.

9 Q. Let's identify this for the record, if
10 you'd like to describe it.

11 A. This is a 16 millimeter Ektachrome print
12 of the Dallas Cinema Associates film, better known
13 as the DCA film. It is on a 16 millimeter core
14 and has some frames marked with little bits of
15 sticky note things. And that's what that is. And
16 it's in a square, 400-foot can.

17 Q. Where did you obtain the DCA film?

18 A. When I was with the House -- I already
19 answered that in the last deposition. But what
20 happened was the House Committee had obtained
21 prints from DCA or people that were related to
22 DCA. I had years earlier found that the original
23 was at Life Magazine and I so informed the
24 Committee. And the Committee went to Life and did
25 obtain the original film. They then gave me the

1 original film to make duplicates of. I made
2 duplicates for them; I made a duplicate for
3 myself.

4 Q. Okay. I will take this back and put
5 these with the others in the National Archives
6 while they are in the process of being reviewed.

7 A. Okay.

8 Q. I'll give you a receipt, if you like.

9 A. Yes.

10 Q. Okay. We'll take care of that later.

11 A. How is that process going? Are they
12 going to be finished with them soon, you think?

13 Q. I hope soon, yes.

14 A. Okay.

15 Q. Now that you've provided the DCA film,
16 is it your testimony that you have complied fully
17 and completely with the subpoena as modified in
18 the June letter in terms of bringing documents
19 with you to -- documents and images to the
20 deposition?

21 A. I believe I have. Based on the review
22 that we did and the list that we went through
23 during the last deposition, I believe this is
24 everything.

25 Q. Do you have any reason to suspect that

1 you have any additional materials that would
2 comply with the subpoena as modified?

3 A. No. May I add to that answer that it is
4 my belief that there should be a 35 millimeter
5 Zapruder copy somewhere. I cannot find it. Many
6 of my materials have turned up missing. There
7 have been researchers in my house, sometimes
8 without my permission and without my presence. It
9 is possible -- I know that some things have
10 disappeared. For instance, an original Jack Ruby
11 business card from the Carousel Club, and other
12 things, photographs, possibly films. I don't
13 know. There should be a 35 millimeter Zapruder
14 copy. I cannot find it. I have recently moved
15 down from New Jersey to here. I'm sorry, from
16 Pennsylvania to here. And I did not come across
17 it at that time. I did look for it. There should
18 be one and I can't find it.

19 Q. Where did you obtain that 35 millimeter
20 Zapruder copy?

21 A. That I do not know. Probably from Mo
22 Weitzman. If it's an original source material, it
23 would have come from Mo Weitzman.

24 Q. Is the 35 millimeter version an
25 internegative or a print?

1 A. It is my feeling that it is probably a
2 print.

3 Q. Approximately when did you obtain the 35
4 millimeter missing version of the Zapruder film?

5 A. If it's what I think it is, it would
6 have been probably sometime around 1975 or '76, I
7 would think.

8 Q. Other than that Zapruder film to which
9 you just referred, is there any other early
10 generation material that you had at one point that
11 you now no longer have possession of?

12 A. There are earlier generation -- there
13 are early generation negatives and prints from the
14 Hughes film and the Bell film. But what I have
15 given you, what I've -- not given you. What I
16 have lent to you are the source materials. As I
17 know it, those are -- those are the closest to the
18 originals.

19 Q. I'd like to go back to our previous
20 discussion of your film "Conspiracy Volume II,
21 Assassination Films".

22 A. Yes.

23 Q. You previously identified the two 16
24 millimeter films that you produced in the
25 deposition as source films for "Assassination

1 Films"; is that correct?

2 A. Yes, um-hum.

3 Q. Is that --

4 A. You mean the Zapruder copies?

5 Q. The Zapruder copies, yes.

6 A. Yes, um-hum.

7 Q. And in addition to the 16 millimeter
8 films, today you've identified a 35 millimeter
9 print that was another source for the Zapruder
10 film in "Assassination Films"; is that correct?

11 A. I believe so, yes. I believe that that
12 was probably one of the source materials.

13 Q. With respect to the Zapruder portion of
14 "Assassination Films", did you have any other
15 source material in addition to the two 16
16 millimeters and the one 35 millimeter film that
17 you have identified?

18 A. When you say source materials, you mean
19 earliest generation -- things that generated--
20 later generation items. Yeah.

21 Q. Yes.

22 A. That should have been it. I do believe
23 that was it.

24 Q. Did you use any 35 millimeter
25 internegatives to produce in any -- did you

1 use -- let me withdraw that.

2 Did you use any 35 millimeter
3 internegatives in any way for the production of
4 the film "Assassination Films"?

5 A. Indirectly, yes. You just reminded me
6 of it. In 19- -- I believe 1991, Oliver Stone
7 licensed Zapruder copies from -- from the Zapruder
8 family, from Jamie Silverberg and the Zapruder
9 family. They had them shipped to Video Post for
10 transfer and I supervised those transfers. There
11 were 35 millimeter negatives and interpositives
12 there which were never in my possession. They
13 were not mine. And we did make copies of those.
14 And those may have been used in the -- in the
15 production of the videotape "The Assassination
16 Films". As I -- as I understand it, those
17 interpositives and internegatives were what were
18 made for CBS-TV in 1975 or '76.

19 Q. Did Mr. Silverberg or Mr. Zapruder tell
20 you how they came to have possession of those
21 internegatives or interpositives?

22 A. I don't recall exactly, but my feeling
23 is -- and again, I've got the memory problem, so
24 I'm not sure. But I have a vague feeling that
25 someone had made the mention somewhere along the

1 line that they were the CBS copies, the blowups
2 that were made in 1975 or '76. They would be
3 closer to the originals than mine. Which are the
4 original, I should say.

5 Q. But you are now testifying that you may
6 have used those materials sent by Jamie Silverberg
7 and Henry Zapruder to Video Post as source
8 materials for your "Assassination Films"; is that
9 correct?

10 A. I may have. I don't know which ones I
11 used. As I recall -- as I recall, and I'm pretty
12 sure we do, we did trans -- I know we transferred
13 those. I know we transferred them. Whether those
14 were used or not, I don't know.

15 Q. How would you be able to determine
16 whether you had used what I will call the
17 Silverberg internegatives for use in your video
18 "Assassination Films"?

19 A. I don't know that I could.

20 Q. Is there any written record kept by
21 Video Post?

22 A. No.

23 Q. Did you keep any written record?

24 A. No.

25 Q. Did you inform either Mr. Silverberg or

1 Mr. Zapruder that you would be using the
2 internegatives that they had sent for your own
3 videotape?

4 A. No.

5 Q. Did you ever request permission to use
6 those for your videotape?

7 A. Yes, um-hum. Not -- not those
8 specifically but copies of the film.

9 Q. From whom did you make the request?

10 A. Jamie Silverberg.

11 Q. What was his response?

12 A. He licensed me to do it.

13 Q. Did he give you the license in writing?

14 A. Yes.

15 Q. Do you have a copy of that?

16 A. I'm sure I do somewhere. I don't know
17 where it is.

18 Can we go off the record?

19 [Discussion off the record.]

20 Q. We have been having a fairly lengthy
21 discussion off the record about Mr. Groden's
22 memories of materials related to the Kennedy
23 assassination. We're now going back on the record
24 to pursue some of those questions.

25 Let me ask you first, could you please

1 identify for me all of the films or images that
2 were ever given to you or lent to you by Mo
3 Weitzman?

4 A. There were copies of Zapruder, Nix,
5 Muchmore, Bell and Hughes. I believe those are
6 the only ones. In fact, I'm sure about Hughes.
7 I'm not a hundred percent sure about Bell. Bell
8 may not have been there, but I'm pretty sure it
9 was.

10 Q. What was your understanding of how Mr.
11 Weitzman came into possession of the Bell and
12 Hughes films?

13 A. CBS Television was doing a special in
14 19- -- or a series of specials in 1975. I believe
15 it was called "The American Assassins". And I was
16 working with them at the time. They wanted to
17 license the Zapruder film and did. And I had
18 suggested that the transfer work should be done at
19 EFX Unlimited because Mo Weitzman had done the
20 work before and was familiar with the process. He
21 could probably do it better than anybody else. So
22 Bernie Bernbaum, the producer at CBS, sent the
23 materials to Mo. I was not part of that. I was
24 not allowed to be part of that. And they also
25 used the, I believe, the Bell and the Hughes

1 film. I know they certainly used the Hughes
2 film. As I recall, they used both. And as far as
3 I know, all those -- all the work was done at the
4 same time.

5 Q. Did Mr. Weitzman give you a copy of the
6 Bell and Hughes films?

7 A. Several copies of the Hughes film. I do
8 believe several copies of Bell as well, both
9 positives and negatives.

10 Q. Do you remember at your previous
11 deposition you provided us with copies of the
12 Hughes and Bell films?

13 A. Yes.

14 Q. Where did you obtain those copies of the
15 Hughes and Bell films?

16 A. Those were copies given to me by Mr.
17 Weitzman. At least the -- certainly the Hughes
18 film and I do believe the Bell film.

19 Q. Do you remember what you said about the
20 origin of those films in your first deposition --

21 A. No.

22 Q. -- that is, the origin of the films you
23 gave to us?

24 A. No. I may have said they came from the
25 House Committee, and in fact they may have. I did

1 the work for the House Committee there too. But
2 for the House Committee I only went up to 16
3 millimeter. Now, I may have blown up the 16 to 35
4 for the Committee, but I don't think I did.

5 Q. Did Mr. Weitzman blow up from either 16
6 or eight to 35 for the Bell and the Hughes films?

7 A. I assume he went from the original eight
8 to 35.

9 Q. Did you ever discuss in any way any
10 internegatives of the Zapruder film with Mr.
11 Weitzman?

12 A. As per our conversation off the record,
13 where you refreshed my memory and triggered some
14 memories, yes, I did.

15 Q. What is your understanding -- and your
16 understanding that your recollections now are
17 somewhat different from what you expressed in the
18 first deposition; is that correct?

19 A. That is correct.

20 Q. What is your understanding now of any
21 discussions that you may have had with Mr.
22 Weitzman concerning internegatives of the Zapruder
23 film?

24 A. Some years ago Mr. Weitzman asked to
25 have back all the materials that he had lent me.

1 And since he -- or had given me. And I did give
2 them all back to him. I brought them to him. I
3 did not know why.

4 As it turns out, a filmmaker by the name
5 of Robert Richtor had requested to borrow the
6 materials. I later found out that the reason why
7 he requested to borrow those materials is he had
8 entered into an agreement with a researcher by the
9 name of David Lifton and David Lifton had access
10 along with Mr. Richtor to those materials, all of
11 the -- all of the Zapruder materials that Mo
12 Weitzman had lent to me or given to me.

13 We had attempted, Mr. Weitzman and
14 myself, had formally requested materials back from
15 Mr. Richtor over a period of, as I recall,
16 something like a year or more. Maybe my memory's
17 not clear on that. Mr. Richtor refused to return
18 phone calls, never returned the items until, as I
19 recall, Mr. Weitzman made a very strong threat.
20 Then some, I do not believe all, of the materials
21 were returned. Mr. Weitzman told me that -- that
22 he had lent materials to Mr. Richtor. I don't
23 know whether he lent him everything or some of
24 it. Mr. Weitzman also stated -- let me -- let me
25 clarify that.

1 The prints that I had of the Zapruder
2 film had gone very red. They had turned very
3 red. The dyes had faded. The film dyes had
4 faded. And I requested to borrow the original
5 negative back to make an additional print that
6 would be color correct and viewable. And Mr.
7 Weitzman searched for those negatives, or that
8 negative, and could not find any negative material
9 on the Zapruder film.

10 If I'd have had a 35 millimeter negative
11 of the Zapruder film, I could have printed it
12 myself. I wouldn't have had to go and ask him
13 about it. But I did ask him and he did not have
14 any.

15 As far as I know, from the first time
16 when he did the film sometime in the 1960s, before
17 I'd ever met him, as far as I know, there was no
18 negative materials at that time at all. But in
19 1975 or '76 apparently there were. As far as I
20 know, I did not have position of the negative at
21 any time.

22 Q. But you were aware that Mr. Weitzman had
23 negatives of the Zapruder film.

24 A. I had assumed that he did because he had --
25 he had the print from -- from '75.

1 Q. And did you ever see any negative from
2 the Zapruder film?

3 A. To the -- well, that's a trick
4 question. I don't think you mean it to be a trick
5 question, but it sort of is.

6 I did see a negative of the Zapruder
7 film made by Mr. Weitzman and sent to CBS
8 Television. And I saw that negative when we
9 transferred it for Oliver Stone in the -- for the
10 movie "JFK". Also, as I recall, there was an
11 interpositive there as well, or maybe more than
12 one. There may have been more than one negative.
13 There may have been more than one interpositive.

14 Q. But as far as you recall now, you saw
15 no -- let me withdraw that.

16 Other than materials that Mr. Weitzman
17 gave to his clients, did you ever discuss any
18 negatives that Mr. Weitzman retained of the
19 Zapruder film?

20 A. As I said a moment ago, I had asked Mr.
21 Weitzman if I could borrow a 35 negative to make a
22 print or if he could make a print for me from the
23 Zapruder negative. And he searched for one and he
24 searched for quite some period of time and he said
25 he could not find them.

1 Now, it's my opinion -- and again, when
2 he said he sent materials to Richtor and Lifton
3 (although he didn't know Lifton was involved in
4 it, he just knew about Richtor), if there was a
5 negative, then it went there. I did not see it.
6 If -- at any time after that point. If I had ever
7 seen it at all, it would have been prior to that
8 point and I do not have a memory of that at all.

9 Q. In other words, you have no memory
10 whatsoever of ever having had in your possession
11 an internegative of the Zapruder film that had
12 been given to you or lent to you by Mr. Weitzman;
13 is that correct?

14 A. As far as I know, no. I did make copy
15 negatives from the print later on. But that would
16 have been a later generation, not an earlier one.

17 Q. I'm not interested in the copied
18 negatives. I'm interested in internegatives.

19 A. The negatives that I had -- any negative
20 that I had or have is a later generation than that
21 original print.

22 The very best generation negatives --
23 and this is just -- I'm adding this. The very
24 best generation negative made from the original
25 that would exist now would be the ones that were

1 made for CBS TV. And they, as far as I know, are
2 in the hands of the Zapruder family because
3 they're the ones -- those are the negatives and
4 interpositives that were sent to -- to Oliver
5 Stone and those would have been made directly off
6 the original. Any other original negative would
7 be in the hands of Life Magazine.

8 Q. Has Jamie Silverberg or Henry Zapruder
9 directly or indirectly requested from you access
10 to any Zapruder film materials that you have
11 possession, custody or control of?

12 A. They did some years ago request a copy
13 of some -- of one print early on. They wanted to
14 be able to differentiate the copy that I had from
15 the copy that they had. So they had me make a
16 copy of one of the prints that I had so they could
17 tell the difference between the two, specific
18 scratches or marks or things of that nature.

19 Q. Have you ever been told -- let me
20 withdraw that.

21 Have you ever been solicited by either
22 Mr. Zapruder or by Mr. Silverberg to provide an
23 image of the Zapruder film that you possessed to
24 some other person on behalf of Mr. Zapruder and
25 Mr. Silverberg?

1 A. I think I hit one of those holes in my
2 memory. It is my opinion that, as I remember,
3 there was -- there was an author who wanted to use
4 single frames in a book and he licensed them from
5 Zapruder, from the Zapruder family. And Mr.
6 Silverberg had me make copies of those individual
7 frames. This is many years ago.

8 But as far as providing -- as far as
9 providing an actual running film, I don't believe
10 so.

11 Q. With respect to individual frames, what
12 is your -- what was your source material for the
13 individual frames that you provided to that
14 author?

15 A. It was from a series of slides. I had
16 made a series of -- I believe -- again, now, see,
17 what's happening is my mind is trying to answer.
18 I want to answer your question and I'm answering
19 you from what I remember, but I could be wrong
20 about this.

21 As I recall, it was from individual
22 slides that I had made. I had made sets of slides
23 through the years from -- from the original
24 print. And when this fellow -- I can't even
25 remember who it was -- had wanted to license

1 individual frames, I believe I made duplicate
2 slides of my slide set for him.

3 Q. When you say from the original print,
4 which version are you speaking of?

5 A. Probably -- I would say probably the
6 first print I got from Mo Weitzman, the one back
7 in 1969 or so.

8 Q. And was that print a positive?

9 A. Yes, um-hum.

10 Q. And that print, was it a 35
11 millimeter --

12 A. Yes.

13 Q. -- version?

14 A. Yes.

15 Q. And is it your testimony that you took
16 individual slides of that 35 millimeter film?

17 A. Yes. I made -- as I recall, I made a --
18 I made a blowup negative. Actually, I probably
19 did it both ways. I probably did direct duplicate
20 slides. But I know I did a blowup negative of
21 individual frames because 35 millimeter motion
22 picture film is half frame. It's single frame.
23 What we see in the way of a 35 millimeter camera
24 negative is a double frame, eight sprocket holes
25 wide instead of just four. So it's twice the

1 size. If you were to reprint a film frame at its
2 normal size, it would be called half frame.

3 So what I did is I, with a bellows and a
4 lens and a camera, I actually photographed each
5 frame and doubled its size to full frame, 35
6 millimeter. And that was -- that's what I used as
7 the source material, as I recall, for those.

8 Q. And you did that directly, not through a
9 copy negative? Is that correct?

10 A. No. I made -- I was making a copy
11 negative.

12 Q. With the slide?

13 A. With -- yeah. I mean --

14 Q. 35 millimeter camera.

15 A. Right. I made full frame and then
16 printed the whole roll of the duplicates and made
17 print slides rather than reversal slides.

18 Q. Where are the copy negatives that you
19 made from that process?

20 A. That I don't know. Probably in my
21 former home in Pennsylvania. I'm sure it can be
22 located.

23 Q. Which are, in your opinion, earlier
24 generation images, the copy negatives that you
25 made from Mo Weitzman's print or the 16 millimeter

1 film that you brought to the first day of your
2 deposition?

3 A. I would say probably the 16 millimeter
4 film. Well, actually the 16 millimeter film and
5 the negative would be the same generation, would
6 be the same generation. But to do a positive
7 print from that negative, it would be an
8 additional generation. So what I brought would
9 have been better, would have been, as a positive
10 image, one generation closer.

11 Q. But as an image, though it was a
12 negative, it would be the same generation?

13 A. That's correct.

14 Q. By my understanding of the terms of the
15 subpoena as modified, those internegative -- or
16 those copy negatives should have been produced at
17 the deposition and I'm now going to ask you to
18 make those available for us.

19 A. Okay. I'll have to find it. I'm not
20 sure where that is. I'll have to look for it.
21 But I have an idea where it is.

22 Q. Have you ever had the 35 millimeter copy
23 negative stills in any commercial storage?

24 A. No. They've always been in my house.

25 Q. As a person knowledgeable in

1 photographic work, would you be able to identify
2 the difference between a print taken from one
3 internegative of the Zapruder film versus a print
4 taken from a separate internegative of the
5 Zapruder film?

6 A. That I don't know. It depends if
7 there's a specific marking. For instance, if one
8 of them had a scratch or a piece of dust embedded
9 in the negative, something of that nature where
10 you identify it one from the other, you probably
11 could.

12 Q. In addition to the marks or the
13 scratches, what else would you look for to
14 identify differences in prints taken from two
15 different copy negatives -- excuse me -- from
16 two internegatives?

17 A. Well, if there's any kind of a
18 difference in -- yeah. On the leader, if it's
19 described differently or if there's any labeling.

20 Q. What about any emulsion that may have
21 been left from the wet gate process?

22 A. I don't think you used the right
23 terminology there, but -- would you repeat the
24 question?

25 Q. Could you explain what wet gate process

1 is?

2 A. There is a -- it's -- wet gate or liquid
3 gate process is a system where -- well, let me go
4 back. When light strikes film, it tends to
5 diffuse, go in different areas, doesn't stay
6 linear. Using a low oxygen liquid to temporarily --
7 it evaporates very quickly. That coats the film
8 as it goes through the film gate. That
9 surrounding barrier around the film causes the
10 light to become linear again, to travel in a
11 straight line rather than to diffuse. And then
12 after the film goes through the gate, it
13 evaporates very, very quickly. That's -- that's
14 what liquid gating is.

15 Q. Now, if the liquid gating or wet gating
16 is not applied perfectly or if there is a smudge,
17 would it not be the case that an image produced
18 from that process may have a blob or a smear on
19 it?

20 A. Well, specifically what you're talking
21 about is about the Zapruder film, I assume. The
22 Zapruder film was treated or coated with a waxy
23 substance that does not allow the liquid to remain
24 flat along the film and it tends to -- to bunch up
25 or bead up, as you said. And theoretically, each

1 particular pass could and probably would, although
2 not definitely, bead up slightly differently, or
3 perhaps with a major difference. If the negative
4 and the print made from that negative are laid
5 side by side, you could identify one to the other
6 by checking that pattern, yes, you could. Then
7 you would -- if you had a separate negative and
8 you compared the print to that, you could tell
9 which of the two it came from by that, assuming
10 that the patterns were not identical.

11 Q. And so would this process of comparing
12 possible patterns of residue or emulsion be a way
13 of identifying two different -- or excuse me --
14 two prints taken from different internegatives?

15 A. It should be. It should theoretically
16 be as unique as fingerprints.

17 Q. Now, if you wanted to determine which 35
18 millimeter source you used for your videotape
19 "Assassination Films", would you be able to
20 examine the "Assassination Films" and identify the
21 internegative from which the film had been taken?

22 A. If I had the internegative, yes, you
23 could. If I can find the internegative, or if it
24 could be found, and find a specific frame where
25 there's a unique pattern, yes, you could be -- it

1 could be established that way.

2 Q. So it would be possible --

3 A. Assuming that it was liquid gated. If
4 it would have been dry gated, just through a
5 regular standard shuttle, then that would not be
6 the case.

7 Q. But there would also be, as you
8 mentioned, scratches or other kinds of marks that
9 might be on the film that would be other ways of
10 identifying possibly the internegative from which
11 the print was taken?

12 A. If the scratch itself were on the
13 negative, yes. If the scratch had been on the
14 original, no. Then it would appear on any
15 duplicate made after the scratch was there.

16 Q. So then, for example, if we were to go
17 to the Oliver Stone version of the Zapruder film
18 and compare that to the version that appears in
19 your "Assassination Films", it would be
20 conceivably possible to identify whether they were
21 from the same source.

22 A. That's correct. But as I said, there
23 were several negatives and -- I believe there were
24 several negatives. I know there was at least one
25 internegative and at least one interpositive. As

1 I recall, there was more than one of each.

2 In other words, the original film is --
3 it's only -- it's only 486 frames, 21 feet of
4 eight millimeter. I'd have to calculate how long
5 it would be. But it would easily fit into a
6 100-foot can, a 100-foot film can, a print or a
7 negative of the original.

8 These were much, as I recall, were much
9 larger rolls. As I recall, there were several
10 takes on each one. And there may have been more
11 than two rolls. I honestly don't remember. But
12 there were -- there were a lot of materials
13 there. And so I could have used any one of those,
14 assuming that we had transferred everything. So I
15 don't know. I just don't know.

16 Q. In thinking about these issues now, does
17 it help refresh your recollection as to what
18 sources you used for your videotape "Assassination
19 Films II"?

20 A. No. Whatever -- as I was doing the
21 editing of the tape, whatever at that time would
22 have appeared to be the best copy is what I would
23 have used. There is one that I know looked better
24 than the others. It's the one that I had referred
25 to as a pristine copy, as I recall. If any of

1 them were from that negative, it would have been
2 probably that. I would think that that would have
3 been the one. But again, I didn't have possession
4 of the negative. I just had access to it that one
5 time.

6 Q. As you're sitting here today, is it your
7 best recollection that for your videotape
8 "Assassination Films" you used an internegative
9 that was created for CBS in approximately 1975?

10 A. It would be my best guess that probably
11 was the case. '75 or '76. I don't really
12 remember the year that it was. It was probably
13 toward the end of 1975.

14 Q. And it's further your understanding that
15 that internegative was created by Mo Weitzman; is
16 that correct?

17 A. That is my feeling. I'm pretty sure
18 that that's the case.

19 Q. Do you recall having had any discussions
20 with Mo Weitzman wherein he stated that or
21 suggested that the internegatives that he produced
22 in the 1960s were of superior quality to the
23 internegatives that were produced in the 1970s?

24 A. I don't believe so. I would think that
25 the opposite would be the case because the film

1 emulsions had gotten better. The degree of -- the
2 degree of sophistication of the negatives and the
3 print materials had gotten better. The print
4 grains had gotten finer. I would think that that
5 would be the case. But I don't know. If we did
6 have such a conversation, I certainly don't
7 remember it.

8 Q. Wouldn't it have also been the case that
9 the quality of the camera original Zapruder film
10 would have deteriorated between 1967 and 1975?

11 A. That is true. In 1975 I know from the
12 dry gate tests that I saw, there was a -- what
13 appeared to be mold growing on the film, a really
14 severe mold situation. The film had not been
15 cared for properly and it appeared very, very
16 dirty at the time. And as I recall, when I saw
17 the prints in '75 and I saw that the -- that the
18 liquid gating was beading up on the -- on the
19 prints, you could see on the prints that it beaded
20 up on the original when the negative was being
21 made, I had suggested that, you know, perhaps they
22 should have done a dry gate. And they showed me
23 the tests from the dry gate and the film was in
24 terrible, terrible shape. So in -- as I recall
25 from the 1960s print -- do you have a specific

1 date for that? For the '60s print?

2 Q. '67 is the year that I understand --

3 A. '67.

4 Q. -- that it was done for Time Life.

5 That's my understanding.

6 A. Okay. Well, let's refer to it then as
7 the '67 negative. The '67 negative would have
8 been made, I assume, before that damage had
9 happened. And as I recall, I don't think it would
10 have been treated yet because I don't recall the
11 beading up of the liquid gate problem.

12 When -- by the way, as an aside, when I
13 was with the House Committee I had suggested to
14 them that they have a liquid gate mechanism, a
15 full immersion gate created, so that the Zapruder
16 film could be liquid gated without that beading.
17 The beading would not -- would not occur with an
18 immersion gate, with a full immersion gate. But
19 they did not want to spend the money to do that.
20 That's just a comment on the side.

21 Q. Now, thinking back, with the idea in
22 mind that there had been a deterioration in the
23 quality of the Zapruder film, does that help
24 refresh your recollection about any discussions
25 that you had with Mo Weitzman regarding the

1 relative quality of 1967 internegatives versus
2 those of 1975?

3 A. I have no memory of it. It doesn't mean
4 it didn't happen. It's just I don't remember a
5 specific conversation.

6 Q. Is it your understanding that the prints
7 that you were given, however, by Mo Weitzman, that
8 is, the 35 millimeter print, was taken from the
9 19- -- from a 1967 internegative?

10 A. It would have to be because it's before
11 the '75 stuff was done.

12 Q. We have now identified both a 16
13 millimeter Zapruder film as well as 35 millimeter
14 copy negative slides that are the same generation
15 of the Zapruder film that you have had possession
16 of; is that correct?

17 A. Yes.

18 Q. Are there any other films that you can
19 now identify to which you have had possession that
20 are of the same or earlier generation to those
21 that we've identified?

22 A. Would you repeat that phrasing? I'm not
23 sure.

24 Q. We've identified previously a 16
25 millimeter Zapruder film and a 35 millimeter slide

1 copy negative of the Zapruder film that are the
2 same generation --

3 A. Right.

4 Q. -- is that correct?

5 A. Um-hum [nods head up and down].

6 Q. In addition to those two films that you
7 have had possession of, are there any other
8 versions of the Zapruder film that are of the same
9 or an earlier generation to which you have also
10 had possession?

11 A. There are the original -- I have a
12 feeling that that's a trick question and I don't
13 think you mean it to be. I have -- I'm trying to --
14 I'm trying to fathom the way you're phrasing
15 this.

16 The materials that they were made from
17 would be, of course, an earlier generation.
18 Individual slide frames that I would have made
19 from the print, individual frames rather than the
20 film itself, would be of the same generation as
21 well. In other words --

22 Q. And did you -- you had possession of
23 those?

24 A. I did. Unfortunately, 95 percent of
25 those were destroyed in a flood in my basement a

1 couple of years ago. They were in a box on a
2 shelf and a water pipe burst right -- right above
3 it.

4 Q. What else was destroyed in that flood
5 from a couple of years ago?

6 A. Probably about five or six hundred
7 books, suitcases, family -- family mementos,
8 cards, report cards, stuff, artwork from when I
9 was a kid.

10 Q. Other than family and personal matters,
11 what other films related to the assassination of
12 President Kennedy were, if any, were destroyed in
13 that flood?

14 A. No films. Just the slides. The slides
15 were separate. Lots of Kennedy assassination
16 books were destroyed.

17 Q. How many times have you personally had
18 access to the camera original Zapruder film?

19 A. To the best of my knowledge, just once.
20 And that was in Life Magazine's offices sometime
21 around nineteen seventy- -- I guess '76 or so.

22 Q. Was the time that you had access to Life
23 after the time of the CBS internegatives being
24 made?

25 A. I believe it was before then but I'm not

1 sure. The circumstances for that was the same.
2 Robert Richter, that I just spoke to you about
3 before --

4 Q. Um-hum.

5 A. -- with his partner at the time, a
6 fellow by the name of McBride, they wanted to do a
7 documentary on the Kennedy assassination in
8 conjunction with an organization that existed then
9 called The Committee To Investigate
10 Assassinations. And they had offered Life
11 Magazine \$10,000 for one time use of the film.
12 And they wanted me to be involved in the process.
13 So when they went up there to do negotiations,
14 they brought me along too. And they requested to
15 inspect the original. And a representative of
16 Life Magazine brought the original film down and
17 put it on a light -- a light box. And that's when
18 I inspected it. It was the only time I've ever
19 held the original in my hand.

20 Q. Can you describe the condition -- you've
21 made previous reference to it, but can you
22 describe the condition of the original Zapruder
23 film at that time, as best you can?

24 A. Like I say, appalling. There were two
25 splices in the film. Ripped -- ripped

1 perforations, as I remember. I have a -- I have a
2 strong recollection that there was a footprint on
3 it somewhere in among the frames. I can't -- I
4 have a very strong feeling it was there. I
5 couldn't tell you where, but I have that image in
6 my mind. And as I recall, I noticed at that time
7 that there was mold growing on the film.

8 Q. What kind of footprint was it? Was it a
9 shoe or --

10 A. Shoe.

11 Q. -- bare foot?

12 A. A shoe type print, as I recall.

13 Q. How were the colors on the film?

14 A. Incredibly clear, vibrant. They had not
15 shifted at all.

16 Q. There were no reds disproportionately
17 then in the original?

18 A. No. No, not at all. I may add to that
19 the original film was Kodachrome. Kodachrome dyes
20 are much more stable than the dyes used in print
21 film.

22 Q. Were they Kodachrome or Ektachrome?

23 A. Kodachrome. As I recall, Kodachrome II,
24 but it might have been just original Kodachrome.

25 Q. Other than the time that you inspected

1 the original Zapruder film at Life Magazine, did
2 you ever see the original film again?

3 A. To the best of my knowledge, no, I don't
4 believe I ever did.

5 Q. How many times did you inspect what you
6 understood to be first generation copies,
7 presumably negatives, of the Zapruder film?

8 A. What do you mean by "inspect"? I mean --

9 Q. Have your physical possession.

10 A. It is entirely possible -- now, you've --
11 we've -- we've discussed what -- what Mo said
12 before.

13 If at any time then I had in my hands,
14 knowingly or unknowingly, a first generation
15 material from that, then it would be very
16 difficult to answer that correctly. I would say
17 that certainly the -- if indeed the materials that
18 Oliver Stone had were the first generation
19 negatives that were made from that film, then that
20 might have been the only time.

21 And once again, I've been working --
22 I've been working with the Zapruder film, one way
23 or another, now since 1969. So it's impossible to
24 give an accurate recollection of anything like
25 that. I'm just telling you now what I remember

1 now as you ask me that question.

2 Q. Sure. You have previously stated before
3 that your understanding was that the
4 internegatives that were used by Oliver Stone came
5 from 1975 or '76.

6 A. I believe that's -- I believe that's the
7 case, yes.

8 Q. What is the basis for your understanding
9 that those inter- -- that internegative or
10 internegatives were created in 1975, '76 rather
11 than from 1967?

12 A. You basically have provided me with
13 that, with a clue of that. You've -- when you
14 mentioned about the liquid gating beading up on
15 it. As I recall, as we watched those negatives, I
16 have a -- I have a very strong recollection now
17 that I noticed that the liquid gating problems
18 were on it, were on that negative.

19 Q. And it's your understanding that in 1967
20 it was dry gated?

21 A. No. I think it was -- I think it was
22 wet gated both times.

23 Q. And so --

24 A. Well, what question are you -- I'm not
25 sure --

1 Q. The question is what is the basis of
2 your understanding that the internegative that you
3 worked on in relationship to the Oliver Stone film
4 was created in 1975 or '76 --

5 A. Okay.

6 Q. -- rather than in 1967?

7 A. And what I had said was that the --
8 there may have been a CBS identification on it. I
9 don't know. But as I recall, the liquid gating
10 beading up from the film having been treated
11 initially, I believe that was very apparent at the
12 time. So I think that's why I assumed it was
13 then.

14 Q. But why would the beading up imply a
15 1975 version rather than a 1967 version?

16 A. Because it didn't bead up on the '67
17 version. The '67 version was, as I recall, or as
18 I believe, before the film was treated.

19 Q. On what basis do you have the
20 understanding that there was no beading up on the
21 '67 internegative?

22 A. Because the print that I had from the
23 one that was given to me by Mo Weitzman did not
24 have any beading up on it. At least I don't
25 believe it did. If it did, it was far less than

1 what we see here.

2 Q. Wouldn't that suggest from what you've
3 just said that the 1967 version that did not have
4 beading up on it would have been a higher quality
5 than the 1975 version?

6 A. There is -- I guess we were involved
7 with the difference of the term "higher quality".
8 The technical quality would have been better, I
9 think, I believe, on the later one because of the
10 film emulsion. They had improved the film
11 emulsion through the years.

12 As far as being a cleaner image than the
13 earlier one, the '67 one would have been better.
14 But again, it would have been on an older emulsion
15 that, you know, if you believe Eastman Kodak, they
16 constantly change their emulsions to improve them,
17 better grain, better contrast control, things of
18 that nature.

19 And although I certainly can't swear to
20 it, as I recall, and again it's a subjective
21 impression, there was less contrast in the later
22 prints rather than the earlier ones. In other
23 words, what was shown on CBS, what was done for
24 CBS would have had more details in the darker
25 areas or the D max -- what's technically called

1 the D max areas. It's my impression that that's
2 the case.

3 Q. If Mo Weitzman were to opine that the
4 1967 internegative or internegatives were of
5 higher quality than anything he was able to make
6 in 1975, would you have any basis for disagreeing
7 with that conclusion?

8 A. Absolutely none. If Mo Weitzman says
9 that, then I would take that to the bank.

10 Certainly, the film was in better shape
11 then. It was cleaner. There wasn't mold on it.
12 If I'm correct and the film hadn't been treated
13 yet, you wouldn't have the problem of the liquid
14 gate beading up on the original. There would be
15 many reasons to assume that a -- that a '67 print
16 would be better than the '75.

17 But again, from a purely technical
18 standpoint, as far as the film emulsion goes, all
19 things being equal, it should have been better in
20 '75. From what I recall from -- from the prints
21 that I've seen from both of them, certainly the
22 '67 would have been cleaner, much cleaner.

23 [Recess.]

24 Q. Mr. Groden, I'd like to switch to
25 discuss some other issues now and leave the

1 Zapruder film behind, at least for the time
2 being.

3 Is it true that you claim to have seen
4 images in the National Archives from the autopsy
5 of President Kennedy that are not contained on the
6 inventories?

7 A. Yes.

8 Q. Which images did you see that are not on
9 the inventories?

10 A. There is a roll of 120 Ektachrome film.
11 120 is the size. 120 Ektachrome film with, as I
12 recall, four or five exposures on it. The
13 brightest of the exposures is too dark and they
14 get progressively worse.

15 They show the president, as I recall,
16 from his left side and show him from above his
17 head to, as I recall, and we're going back to 1978
18 now, to about midthigh or knee, that area. He is
19 lying on his back and the head -- the face is
20 toward the ceiling. It was -- seems to have been
21 taken either with a wide angle lens or from some --
22 from some distance away. They are color
23 transparencies.

24 I wrote a report about this to the House
25 Committee and requested that they take the better --

1 the best or the brighter of these frames and
2 enhance them. In other words, do duplicates of
3 them in lighter exposures. To the best of my
4 knowledge, that was never done.

5 Q. Other than the images that were on the
6 roll of 120 film, are there any other images that
7 you have ever seen that are not contained in any
8 of the Archives' inventories?

9 A. I cannot honestly say that I am familiar
10 verbatim with the autopsy inventories. I know
11 that some things that were originally in the
12 original inventory are not there, specifically the
13 open chest photographs. It is my opinion that, of
14 what the Clark panel saw, or what I assume the
15 Clark panel saw, what was shown to me in the House
16 Committee volumes, I saw nothing else, as far as
17 photographs go, relating to the autopsy in the
18 National Archives that is not in an inventory
19 except what I just described as the 120.

20 Q. Did you make any kind of copy of those
21 five images that were on the 120 film?

22 A. No. The copies that were made in the
23 experiment to prove the soft edge mat insert
24 process were only from later generation duplicates
25 and were not from the originals and were not done

1 in the National Archives. Those images that you
2 just asked me about only appear in the Archives.
3 As far as I know, the House Committee, as an
4 entity, did not have copies of those pictures.

5 Q. Did you see any information on those
6 five images that you believe would help illuminate
7 the circumstances surrounding the autopsy?

8 A. I only viewed them hand-held and through
9 a loupe, an optical loupe. It was my suggestion
10 to the Committee that they do lighten them up and
11 blow them up so that they could be studied. My
12 feeling is that any photographs showing the
13 president's body would add to the record. I was
14 not granted access in the sort of situation
15 whereby I could study them.

16 Again, the images are very dark. It is
17 very clear to me that when the pictures were
18 taken, they were taken without a flash. Or if
19 they were just under available light, because
20 they're so dark. And whoever did it bracketed
21 them, starting with the brightest exposure and
22 then going darker and darker and darker. That's
23 why, as it fades to darker, I'm not sure how many
24 images were there. Originally I thought there
25 were only maybe two or three, but as I looked at

1 them more, I could see that there seemed to be
2 exposures that were just so faint and so dark that
3 you could hardly see them. So I don't know how
4 many there were. For all I know, it could be the
5 whole roll.

6 Q. When you say 120 film, your assumption
7 then would be, I assume, that that was a medium
8 format camera?

9 A. Yes. And by the way, as I recall, the
10 film was not cut. The individual frames were not
11 cut. It was a continuous roll and rolled up into
12 a cylinder type shape.

13 Q. Do you remember from the first day of
14 your deposition when you said that you received
15 some black and white autopsy photos from David
16 Lifton?

17 A. Yes, um-hum.

18 Q. Was that in approximately the late 1980s
19 that you received them from David Lifton?

20 A. Yes. It would have been probably 1987
21 or 1988.

22 Q. Did you ever show any black and white
23 autopsy photos to anyone prior to the time that
24 you received photographs from David Lifton?

25 A. I may have shown black and white copies

1 of the color pictures that I had, but I don't know
2 that to be a fact. It is entirely possible that I
3 did.

4 Q. Did you obtain any black and white
5 autopsy photos from the time that you worked at
6 the HSCA?

7 A. Absolutely not. None.

8 Q. Did you ever obtain any black and white
9 autopsy photos other than from those that were
10 provided to you by David Lifton?

11 A. Yes. By Mark -- from Mark Crouch. That
12 was after the Lifton pictures. I do not believe
13 David Lifton sent me the entire inventory that he
14 had. He may have or he may have just sent me
15 maybe two of them or maybe three.

16 Q. What were the circumstances under which
17 you obtained black and white autopsy photographs
18 from Mark Crouch?

19 A. Mark had wanted to meet me for some time
20 and David Lifton had refused to give him my phone
21 number and address, even though we lived just a
22 few miles apart. And when we finally did meet, we
23 became friends. And he told me then what David
24 Lifton had never told me, that Mark was in fact
25 the source for Lifton's pictures, that Mark had

1 gotten them from a Secret Service agent.

2 Q. Did Mark Crouch tell you approximately
3 when he got them from the Secret Service agent?

4 A. I'm sure he did, but I really don't
5 remember. I'm sure -- I know -- I know he did. I
6 know he's written memos. He's written about it.
7 I just don't remember when that was.

8 Q. Was it your understanding that that
9 Secret Service agent was James Fox?

10 A. Yes.

11 Q. Would it -- would it make sense for you
12 for us to refer to those photographs as the Fox
13 set?

14 A. Sure.

15 Q. That's an understandable way?

16 A. Sure.

17 Q. Other than photos that come from the Fox
18 set, did you ever come into possession of any
19 other black and white autopsy photographs?

20 A. No. To the best of my knowledge, no.
21 If I did, I assume it was from the Fox set. Other
22 than that, no, absolutely not.

23 Q. Are the photographs that you published
24 in your videotapes and books from the autopsy,
25 were all of those black and white photographs from

1 the Fox set?

2 A. The black and white ones were from the
3 Fox set. The color ones were from my own.

4 Q. Are you certain that prior to the time
5 that you received black and white photos from
6 David Lifton of the autopsy, that you did not show
7 any black and white autopsy photos to any
8 assassination researchers?

9 A. As I said, if I did show them, they
10 would have been black and white prints of the
11 color pictures that I already had, that I
12 mentioned to you. Or they could have been black
13 and white copies from David Lifton's book which
14 he, as I recall, he had already published, "From
15 the Best Evidence".

16 Q. Are you familiar with the photograph
17 that is a left profile view of President Kennedy
18 lying supine?

19 A. Just from about midthroat to the top of
20 the head?

21 Q. Yes.

22 A. Yes, uh-huh.

23 Q. Are you aware of any image that shows
24 President Kennedy from the exact same angle but
25 from the right profile?

1 A. No. I'm familiar on the right side from
2 one taken lower and one higher, but not identical,
3 no.

4 Q. Have you ever heard any discussion about
5 whether there is a photograph that was taken from
6 the same -- at the same angle as the left profile
7 of the right profile?

8 A. Not that I'm aware of.

9 Q. Have you ever heard anyone discuss the
10 possibility of such a photograph?

11 A. Not that I'm aware of. I can't recall
12 any mention of it in any of the literature and I
13 don't think anyone's ever mentioned it to me.

14 Q. Do you recall ever having seen any
15 autopsy photographs with probes inserted in the
16 body?

17 A. None. Absolutely none.

18 Q. Have you ever heard any discussion about
19 the possible existence of such photographs?

20 A. Not that I'm aware of. Let me clarify
21 that. I interviewed Floyd Reiby, a photographer
22 who lives in Oklahoma, who took 35 millimeter
23 photographs at the time of the autopsy. No 35
24 millimeter photographs have ever been turned up
25 into evidence.

1 If Mr. Reiby had mentioned to me that
2 there was something with a probe or something of
3 that nature, I don't remember it. But I don't
4 remember my conver- -- I spoke with him for
5 several hours, and I don't remember. I did not
6 take notes, and I don't specifically remember. If
7 he had mentioned something that like me, I
8 probably would have remembered. I'm very, very
9 curious and would like very much to know what
10 happened to all those 35 millimeter pictures that
11 he took because not a single one has ever appeared
12 anywhere.

13 Q. While you were working for the HSCA, did
14 you have access to color transparencies of the
15 autopsy?

16 A. I was able to view them, yes, in the
17 National Archives.

18 Q. What were the circumstances under which
19 you viewed the color transparencies at the
20 Archives?

21 A. I had requested to see the originals
22 because of the impressions I got from seeing the
23 duplicates. The duplicates, to my eye, showed me
24 evidence or indications of forgery and I requested
25 to see the originals to see if such indications

1 appeared on them as well.

2 Q. Did you find any evidence of forgery on
3 the color transparencies?

4 A. That which I felt then and still feel
5 now was evidence of a soft edge mat insertion on
6 the duplicates was less apparent or virtually
7 unapparent on the originals.

8 Q. Did you reach any conclusions as to
9 whether the color transparencies were in fact
10 originals, camera originals from the night of the
11 autopsy or whether they could be forgeries?

12 A. The feeling I got when I saw them -- and
13 this was not based so much on quality or anything
14 of that nature but based specifically on the
15 testimony of the doctors made at that time. It
16 was my opinion that the photographs specifically
17 of the rear of the head were forgeries, that the
18 other ones I could -- I had no reason to believe
19 that they had been faked. But the ones showing
20 the rear of the head, based on the testimony of
21 everyone who had ever said anything about it, I
22 concluded that they were forgeries.

23 Q. Did you base your conclusions on
24 anything other than the testimony of the doctors?

25 A. Well, yes. And that is that in the

1 duplicates that the House Committee had, which
2 were of a much -- I assume a much later
3 generation, at least two generations, four
4 generations later, that you could see what
5 appeared to be a contrast line buildup, which
6 would occur during a situation where a soft edge
7 mat would be used. The later the generation, the
8 more a mat would appear. Based on what I saw
9 there, which is my original feeling that they were
10 faked. That and what the doctors said made me
11 conclude that, as convincing as what purports to
12 be the originals in the Archives are, that they
13 had to be forgeries.

14 Q. Were you able to discover any evidence
15 from the trans- -- the color transparencies
16 themselves of forgery?

17 A. No. Well, there was one thing that made
18 me think that they were. Looking at them side by
19 side in stereoscopic views, to my eye anyway, as
20 you would see with a view master, there -- since
21 the two -- the camera was hand-held. And since
22 two of them side by side were from slightly
23 different angles about the same distance as the
24 human eye from each other, when you view them in
25 stereoscopic pairs, you should see a perfect three

1 dimensional image. To my eye, I did not. I saw
2 the three dimensional image until you got to the
3 suspicious area in the back of the head and it
4 seemed to go totally flat. That to me seemed to
5 be evidence of forgery. That should not be.

6 Q. Did you have an apparatus there for
7 looking at them in stereo?

8 A. I used optical loupes, a pair of optical
9 loupes, as I recall.

10 Q. What is the basis for your understanding
11 that the camera was hand-held?

12 A. That's what I was told. I was told it
13 was hand-held. And the fact that they bracketed
14 exposures, that is, light, medium and dark, for
15 almost all the pictures. And the -- it was a four
16 by five camera, where you put in a slide with -- a
17 film holder with a slide and then you take the
18 picture and you turn the slide around and take the
19 second. You put the holder -- can I do this
20 over? You put the film holder in backwards,
21 remove the second slide and do the second
22 exposure, take out the film holder, put in another
23 film holder.

24 Had it been on a tripod or steadier
25 still, the area should be the same in every

1 picture. That is, if it's -- if it's being held
2 by tripod and it's aimed at a specific area, the
3 borders, the information in the borders of each
4 picture, if they're legitimate pictures, should
5 remain identical in every one, give or take a
6 millimeter or two for camera movement or
7 whatever.

8 But here the angles are so different, so
9 vastly different between them that I can only
10 assume that what I had heard, that it was a
11 hand-held camera, was true. And I believe Floyd
12 Reiby told me that the photographer who was taking
13 the four by fives did hand-hold the camera.

14 Q. Did you ever tell anyone that you had
15 taken from the Archives any of the Archives' own
16 images of the assass- -- of the autopsy?

17 A. No. Never. The one time that Archives
18 copies were taken out, they were taken out by an
19 FBI agent, handcuffed to his wrist in an attache
20 case and taken to a lab in Maryland where we ran
21 tests on the pictures. And I didn't do that. The
22 lab people did. And that was the lab, I believe,
23 called Bara (B-A-R-A) and Bara had a contract with
24 the HSCA. That's the only time, to my knowledge,
25 that any original materials left the Archives.

1 Q. Okay. I'd like to turn to the Nix
2 film.

3 A. Okay.

4 Q. Do you recall in your -- the first day
5 of your deposition when you said that you had
6 access to the original Nix film from Orville Nix
7 himself?

8 A. No, I didn't say that.

9 Q. Could you turn to Page 45 of the
10 deposition? Can you look at the portion between
11 Lines 7 and 13?

12 A. Nix is Number 3. That's a 35 millimeter
13 color print of a Nix film. It says it came to me
14 by Orville Nix.

15 That can't be right. I didn't say
16 that. I did not -- I did not say that. If I did
17 say that, it was -- it was some kind of a confused
18 thing. It did not come to me that way. The
19 Orville Nix film came from UPI for use in the film
20 "Executive Action".

21 Q. Was that the original Orville Nix film
22 that came from UPI?

23 A. Yes, um-hum. I assume it was, based on
24 its clarity. I did not hand-hold that. I did not
25 see that. I have never held the Nix original in

1 my hand in my life.

2 Q. Now, looking back at your testimony on
3 Page 45 of the transcript --

4 A. Um-hum.

5 Q. -- would it be fair to say that you --
6 your present testimony is that you did not receive
7 access to the original Nix film from Orville Nix?

8 A. That is absolutely correct.

9 Q. Do you recall that at your -- the first
10 day of your deposition you provided us with a 35
11 millimeter copy of the Nix film?

12 A. Yes, I did.

13 Q. Where did you obtain that 35 millimeter
14 copy of the Nix film?

15 A. From Mo Weitzman.

16 Q. Could you explain to me where the -- let
17 me withdraw that.

18 Just a moment ago you referred to the
19 film coming through UPI for the film "Executive
20 Action"?

21 A. That's correct.

22 Q. What is the relationship between the
23 film "Executive Action" and UPI and the version
24 that you had given by Mo Weitzman?

25 A. UPI and EFX Unlimited, Mo Weitzman's

1 company, were in the same building in New York
2 City. When the producers, I believe, Wakeford
3 Arloff Productions -- and I can't spell that --
4 were going to do the film, they wanted to license
5 some of the actual footage of the motorcade in the
6 plaza. And they did indeed license it from --
7 from UPI. And since UPI and EFX Unlimited were in
8 the same building and just a few floors apart, and
9 since one of the consultants to Wakeford Arloff
10 was Lifton, and Lifton in those days I made the
11 mistake of trusting, I had suggested to him that
12 Mo Weitzman might be the perfect person to do the
13 work. And, in fact, he was. Now, the only -- the
14 only finders fee that I got for doing that and
15 setting all that up was that both David Lifton in
16 California and Mo in New York gave me copies of
17 the film.

18 [Discussion off the record.]

19 Q. If Mo Weitzman were to say that he never
20 had a copy of the Nix film, that is, everything
21 that he produced he gave back, would you have any
22 reason to disagree with that?

23 A. I would have to, yeah.

24 Q. Are you certain that Mo Weitzman gave
25 you a copy of the Nix film?

1 A. Yeah.

2 Q. Do you know approximately -- let me
3 withdraw that.

4 In your prior day of deposition you said
5 that that 35 millimeter Nix film was given to you
6 by Mo Weitzman in approximately 1973. Is that
7 correct?

8 A. That is correct.

9 Q. That would mean necessarily that the
10 film stock from which the Nix film was made would
11 have necessarily been made prior to 1973; is that
12 correct?

13 A. Either during 1973 or prior to that
14 point.

15 Q. Approximately, yes.

16 A. Yeah.

17 Q. If the film stock on which the Nix film
18 you gave to us was manufactured in the 1980s, then
19 that would indicate, would it not, that the film
20 was not given to you by Mo Weitzman in the 1970s,
21 wouldn't it?

22 A. Either that or it would mean that the
23 print was made at a later time after -- after the
24 negative had been made.

25 Q. When was the print made from the 35

1 millimeter Nix film that you gave to us --

2 A. That I don't --

3 Q. -- for the first deposition?

4 A. That I don't know. I don't know when
5 the print was made.

6 Q. Well, is the version that you gave to us
7 in the deposition the exact same film that Mo
8 Weitzman gave to you in 1973?

9 A. I believe it is. Or it was made in '73
10 and he didn't give it to me until some later point
11 in time. That I don't know. I know that there
12 was a -- I know that there was a 16 millimeter
13 print because I showed -- I showed that print in
14 Georgetown University on November twenty- -- the
15 night of November 22nd, morning, early morning of
16 the 23rd in 1973. And that's -- that particular
17 print that I had at that time, I know I got back
18 then. Whether I had gotten the 35 millimeter
19 print then or at some later time, that I'm not
20 sure of. But I know that this is print made
21 directly -- I did get this from Mo. I'm just not
22 sure what time.

23 Q. Well, my next question for you had been,
24 was the 35 millimeter film the one you showed at
25 Georgetown and I assume the answer now is it was

1 not.

2 A. It could not have been because it was a
3 16 millimeter projector.

4 Q. Where is the 16 millimeter film?

5 A. That I do not know. If I'm not
6 mistaken, that's edited into a compilation film
7 that I have of the -- of just different films
8 together. Old Zapruder, Nix, Muchmore, all that
9 old stuff, I put together an original reel which I
10 showed to Congress and to the congressional
11 delegation.

12 Q. Where is that original reel now?

13 A. That I'm not sure of. I'd have to --
14 I'd have to find that. I know it exists or it's
15 around somewhere, but I don't know where that one
16 specifically is.

17 Q. It's my understanding that that film
18 that you've been referring to as the original film
19 reel is called for by the subpoena and I'd like to
20 ask you to look for that and make that available.

21 A. Okay. Now, the 35 millimeter that I
22 gave you is the same generation and would be a
23 better quality, since it is 35 millimeter. So it
24 would be the better of the two. But let me get
25 that.

1 Q. Is there any other way that you describe
2 that particular film to yourself that would be a
3 way that we could refer to it as one that spliced
4 together different several films?

5 A. No. I just call it a compilation.

6 Q. Then I'll call it the compilation. If
7 the 35 millimeter film is in fact on film stock
8 from the 1980s, how would you best explain the
9 origin of the 35 millimeter film?

10 A. If it is from the 1980s, that would mean
11 that I got -- either got the print from Mo at some
12 later time or -- actually, that's the only thing I
13 can think of because, remember, I told you that Mo
14 had given me some materials later on at a later
15 period of time? I would think that that's where
16 that would have come from. There was also another
17 print from David Lifton in California at about the
18 same time or the following year, something of that
19 nature.

20 Q. Are you absolutely certain that you
21 received a print of the Nix film from Mo Weitzman?

22 A. Yes.

23 Q. At the time of your work for the HSCA,
24 did you make any copies of the Nix film?

25 A. No. As a matter of fact, I requested

1 from them to be able to, specifically around the
2 area of the head shot. And they told me that they
3 had had it and they'd already returned it. They
4 did not grant me access to the Nix film at any
5 time, although that was one of the things I wanted
6 to do more than virtually anything else.

7 Q. Did you ever see an eight millimeter
8 version of the Nix film?

9 A. Not that I'm aware of. I don't think
10 I've ever seen an eight millimeter copy of the Nix
11 film.

12 Q. When did you first show --

13 A. Oh, wait. Wait a minute. Wait a
14 minute. No. Let me take that back.

15 In the National Archives -- in the
16 National Archives, I believe there was an eight
17 millimeter copy of the Nix film. The FBI had an
18 eight millimeter copy of the Nix film. And as I
19 recall -- I'm not -- I'm not really clear on
20 this. I believe they were both eight millimeter
21 copies. The FBI had one and the National Archives
22 had one. And there was some kind of a switch that
23 Gail Nix Jackson had made. The FBI had apparently
24 given her their copy and they had somehow or other
25 traded off because it was the better copy she

1 wanted and the better copy was in the Archives, or
2 something of that nature. I'm not -- I don't
3 remember exactly what it was. But as I recall,
4 those were eight millimeter copies.

5 Q. Did you ever hear anyone say that the
6 original eight millimeter Nix film was housed in
7 the National Archives?

8 A. No, hum-um. I don't believe so. As I
9 recall, there was some question about what had
10 happened to it because when the House Committee
11 had it -- they told me that they had returned it
12 to -- I guess it was WTN in those days, World
13 Television News. But after the House Committee
14 had broken up, after they no longer existed, I
15 heard all sorts of stories from Gary Mack and
16 others that original materials had been put in --
17 placed in the Archives and not returned to the
18 original people that had owned them.
19 Specifically, as I recall, the Moorman photograph
20 is one of those. And when you -- when the House
21 Committee couldn't find the receipt for the
22 original film initially, it had been hypothesized
23 by Gary Mack that the film may have been turned
24 over to the National Archives in bulk with other
25 materials. But then somehow or other during the

1 search to try to find out what happened to Gail's
2 film, they found the receipt from WTN that it had
3 been returned to them.

4 Q. Did you ever hear of anyone affiliated
5 with WTN saying that the original Nix film had
6 gone to the National Archives in 1967?

7 A. In '67?

8 Q. Yes.

9 A. No. WTN didn't even exist in '67.

10 Q. I didn't say that WTN existed in '67.

11 A. Oh, that the film had gone there in
12 '67.

13 Q. Or that --

14 A. No. No, I don't think so.

15 Q. Or that UPI had sent the original Nix
16 film to the National Archives in 1967.

17 A. That couldn't have been true because --
18 if anyone did say that, it couldn't have been true
19 because they had the original film that for --
20 unless they got it out of the Archives, for
21 "Executive Action".

22 Q. How do you know that they had the
23 original film for "Executive Action"?

24 A. Well, the clarity of the image. That
25 was blown up to 35 millimeter. If it had been

1 from a duplicate, it would have been nowhere near
2 that clear. It would have been -- it would have
3 been contrasting, blurry, out of focus.

4 Q. Did you at any point in 1991 represent
5 Gail Nix Jackson?

6 A. Did I represent her?

7 Q. Yes. Or perform any -- or perform any
8 work for her?

9 A. There was a time in 19- -- around that
10 time. I can't remember the exact year when it
11 was. But she asked me to pick up films from WTN
12 in New York, all of their duplicates that belonged
13 to her, for her, and I did.

14 Q. In conjunction with that work, did you
15 see any documentation either from Gail Nix Jackson
16 or from WTN or UPI about ownership rights or
17 interests in the Nix film?

18 A. Not that I'm aware of. That particular
19 day -- this is kind of weird, as far as if I had
20 seen them, I wouldn't have known it. I was trying
21 out contact lenses for the first time in my life
22 and was having a lot of problems with them. And
23 they were hurting. And I had to take one out of
24 one eye and I was practically blind in one eye
25 anyway and it was the wrong prescription. So I

1 had a real hard time that day and I had to drive
2 to New York that day. And the only time there was
3 any paperwork that I'm aware of that I was
4 involved in was signing for the prints at WTN.

5 Q. Can you explain just very briefly who
6 Gail Nix Jackson is?

7 A. Gail Nix Jackson is the granddaughter of
8 Orville Nix, Sr., who had taken the Nix film.

9 Q. How did you come to provide services for
10 Ms. Jackson?

11 A. When we were making the movie "JFK", one
12 day when I was up at the art department here in
13 Dallas, she had come in. They had licensed the
14 rights from her, but she didn't have prints of the
15 film. And Oliver was going to use my -- copies of
16 my prints and had license from her.

17 So somebody who worked for Oliver had
18 brought her in and we met for the first time. And
19 I thought she was really nice. And I met Orville
20 Nix, Jr. too, as I recall, Gail's father, at the
21 same time. And they seemed very nice and really
22 concerned that, you know, that they didn't have
23 the materials. And I offered to and did
24 subsequently provide them copies of the -- of the
25 materials on my own. I gave her copies on

1 videotape and film transfers as well.

2 Q. And what was your source for the tapes
3 and the transfers that you gave to her?

4 A. As I recall, the 35 millimeter print
5 that you have now in your possession.

6 Q. And when is the next time that you spoke
7 with Ms. Jackson about the Nix film?

8 A. I don't know. We've spoken a lot of
9 times. We've appeared on TV together.

10 Q. Well, at some point did she ask you to
11 do some work for her related to the Nix film?

12 A. She's -- she was going to -- as I
13 recall, she was going to license some stuff to --
14 overseas somewhere and she asked me to make copies
15 of either -- I can't remember if it was the films
16 or the tapes. It was one of the two. As I
17 recall, the transfer was at Video Post. It was
18 for overseas, as I recall.

19 We've spoken a lot of times. And she
20 asked me to do the transfer, the change -- the
21 exchange for her, pick up the film from the
22 Archives. And I went to -- no -- to inspect the
23 film in the Archives to see if it was the
24 original. She thought -- she had thought that the
25 FBI copy or the copy that was in the Archives

1 might have been the original and she wanted me to
2 inspect it for her, and I did. And it was a
3 duplicate. It was not the original.

4 Q. Approximately when did you talk to her
5 about the possibility of the film in the Archives
6 being an original?

7 A. That I have no idea. As I recall, she
8 was the one who came up with the concept that it
9 might have been.

10 Q. Did you -- have you ever -- although
11 I've asked you these questions before, I'm now
12 wondering whether your recollection has been
13 refreshed on whether you recall anyone else or any
14 other circumstance in which someone suggested that
15 the original Nix film is housed by the National
16 Archives.

17 A. If so, I'm not aware of it. I know that
18 Gary Mack had mentioned several times about the
19 House Committee sending stuff to the -- to the
20 Archives rather than sending it back to the
21 original owners. So that may have had something
22 to do with it. Gary may have suggested it. He
23 may have suggested it to Gail. Gail suggested it
24 to me. Other than that, I'm not aware of anyone
25 else suggesting it.

1 Q. Do you remember who the person was you
2 made contact with for WTN or UPI?

3 A. WTN it was in those days. No, I don't.
4 The person who I was supposed to see had already
5 left for the day that day when I went up there.
6 Because I had this problem with the contact lens,
7 I had to drive very, very carefully because I
8 could only basically see out of one eye, and it
9 was raining, as I recall, that day.

10 And when I went up there to get the
11 stuff, the person who I was supposed to see had
12 left. And I was really upset because nobody
13 wanted to get me the stuff for Gail. Nobody knew
14 where it was or whatever. Phone calls had to be
15 made. And finally everything was straightened
16 out.

17 And they went through -- so they had all
18 the Nix and Muchmore stuff in the same place. We
19 had to go through everything and see what was Nix
20 and what was from -- what was Muchmore because
21 they retained the Muchmore stuff, the closest
22 things to the originals. That is what they had.
23 And then I picked up all the stuff for Gail and
24 then took it home, wrapped it up and shipped it to
25 her.

1 Q. How long did you have possession of it
2 between the time you picked it up and the time you
3 shipped it?

4 A. I don't know. A day, two, three. I'm
5 not sure. It was very rapid.

6 Q. Did you make any copies of any of the
7 material?

8 A. No, because the copies were not that
9 good. There were probably first or second
10 generation Ektachromes, but nothing larger than 16
11 millimeter. Upon inspecting them, they just
12 weren't very sharp. They weren't very good. The
13 copy that I had was already far superior to it.

14 Q. Do you believe that WTN is still in
15 possession of the original Nix film?

16 A. Yes.

17 Q. What is the basis for that assumption?

18 A. Its value. The Nix film is, outside of
19 the Zapruder film, the most important film of the
20 case, I believe. I also believe that in one way
21 it may be even more important than the Zapruder
22 film.

23 The first generation copies that I've
24 been working with, on that copy I have found
25 movement behind the retaining wall on the grassy

1 knoll, this being from a copy that's already a
2 generation removed, or actually two generations
3 removed, considering the fact of the negative that
4 was done in between. That image can be severely
5 enhanced from the original film.

6 This is why I wanted to borrow it from
7 the House Committee when they had it. They told
8 me it had already been returned and I was very,
9 very upset. I said, "Did you look in that area?"
10 And they told me, "Yeah, we looked. There's
11 nothing there," because where this guy is there is
12 a flash at about the time of the head shot. And I
13 pointed it out to them and they just didn't seem
14 to care. I was very, very upset at that. Of all
15 the things I wanted to do for them, that's what I
16 wanted to do the most. And they said, "No. We've
17 already sent it back."

18 Q. Did they say to where they had sent it
19 back?

20 A. I don't know whether they specifically
21 said to WTN or not, but the implication was that
22 that's where they had sent it to. And it was Jane
23 Downey who told me it had been sent it back. I
24 remember that very well because I was so
25 frustrated by this.

1 And my next question, as I recall, was
2 "Can you get it back?" And I was told no. And I
3 could be wrong about it. That could just be one
4 of those memories that you believe. I do believe
5 I was asked if they could get it back and was told
6 no.

7 I was also told at the same time -- I
8 wanted -- I wanted to work on the Zapruder film,
9 the original then too. And they said, "Well, the
10 Zapruder family specifically stated that you," you
11 meaning me, "are not to touch the film."

12 Q. And why did the Zapruder family say
13 that?

14 A. At that time I don't know. I don't know
15 specifically why. But they -- that's what the
16 House Committee told me. They told me I
17 specifically was not allowed to touch the original
18 Zapruder film.

19 [Lunch recess.]

20 Q. Mr. Groden had something that he wanted
21 to say about interaction with Ms. Jackson.

22 A. Yes. Through -- through the years I've
23 been trying to aid Ms. Jackson in finding the
24 original Nix film. And she constantly let me know
25 where she was going with these, with her

1 investigation and what she was being told. And if
2 it's not already in the record, I think it ought
3 to be.

4 She told me that representatives of WTN
5 said that they had given both the Nix and the
6 Muchmore film originals to a fellow who worked
7 there and he had placed them in a bank vault in
8 New York City. He was the only one who knew what
9 the bank vault number was, they say, and he died
10 somewhere along the line and no one had realized
11 that he was the one who had this. In the interim,
12 the bank itself was torn down, including all the
13 safe deposit boxes and all the rest.

14 If that's the story, and it seems
15 awfully convenient that they came up with this, if
16 that -- that's the story that they came up with
17 and told her. So they did admit receiving the
18 films back from the -- from the HSCA and, of
19 course, the receipt was finally found so they did
20 get them back. The question is, did they really
21 put it in a bank vault or did they still have it
22 in their hands somewhere?

23 Back when UPI had it, Burt Reinhart kept
24 them with -- kept them with him all the time until
25 the -- until it was sold.

1 Q. I'd like to ask the reporter to mark the
2 next two documents as Exhibit Numbers 7 and 8 to
3 this deposition.

4 [Exhibit 7 and 8 marked.]

5 Q. I'll state for the record that Exhibit
6 Number 7 appears on its face to be a document
7 entitled "Nix Release of WTN", apparently signed
8 on the 5th day of April 1993. And the second
9 document, Exhibit 8, is what appears to be on its
10 face to be an acknowledgment for receipt of
11 certain materials, dated on its face 6/28/91. I
12 will also state for the record that there are, on
13 Exhibits Number 7 and Number 8 fax identification
14 numbers, which I presume were not part of the
15 original document.

16 That said, I'd like to first show Mr.
17 Groden Exhibit Number 7 and ask him whether he has
18 seen the document previously, prior to today.

19 A. To the very best of my knowledge, and
20 I'm convinced this is absolutely true, I have
21 never seen this before. The release, Nix release
22 of WTN, I have never seen. I've never even heard
23 that this existed.

24 Q. That is Exhibit Number 7; is that
25 correct?

1 A. Yes, um-hum.

2 Q. I'd like to show you a document now
3 marked Exhibit Number 8 and ask you whether that
4 is your signature that appears on the page.

5 A. It certainly appears to be, um-hum.

6 Q. Do you have any recollection --

7 A. Yeah.

8 Q. -- of having seen that document prior to
9 today?

10 A. I have to answer that kind of
11 nebulously. I have no doubt that I signed this
12 but, as I had mentioned before previously --

13 Q. As when we were off the record?

14 A. No. I think we were actually on the
15 record at the time.

16 Q. Okay.

17 A. I'm not sure. I was trying out a pair
18 of contact lenses that day and was having trouble
19 with them and could not really focus. When I
20 signed this, this was supposed to be just a
21 receipt for -- for picking up the films, the
22 duplicate films that were at WTN that afternoon.
23 And as I said before, it was a rainy afternoon and
24 I guess it was, as I recall, pretty close to 5:00
25 o'clock or so in the afternoon.

1 Q. Was there any itemized catalogue or
2 itemized inventory created in conjunction with
3 Exhibit 8?

4 A. That I do not know. They -- the people
5 at WTN had all the Nix stuff and all the Muchmore
6 stuff together, sometimes on the same reel. And
7 what we did is, we reviewed every reel that they
8 had within this inventory that was presented to me
9 and we took off all the Nix footage and they kept
10 all the Muchmore footage.

11 Q. Did you splice the film to take off
12 the --

13 A. You mean --

14 Q. -- separate the material?

15 A. -- tear them? I did not. They did. As
16 I recall, on some of them. Most of them, as I
17 recall, were just multiple takes on the same rolls
18 or something like that. But these are the --
19 this, as I -- as I recall, virtually everything
20 was like 16 millimeter. I could be wrong about
21 that. There might have been 35s. There might
22 have been eight. I don't know. But as I -- I
23 seem to recall it was probably 16 millimeter.

24 Q. Do you see up at the top of Exhibit 8
25 what appears to be a reference to 745 feet of

1 film?

2 A. Approximately -- yes. It says
3 approximately 745 feet of film.

4 Q. Do you know how that figure was reached?

5 A. No.

6 Q. Did you ever play any role in measuring
7 the length of the film?

8 A. I don't believe so.

9 Q. Do you know whether the 745 feet
10 included leaders or not?

11 A. I would assume that it would. I don't
12 know. I don't know how they reached that figure.
13 As a matter of fact, I couldn't even focus. I
14 didn't even know it said 745 feet. This is the
15 first time I've ever seen this in focus.

16 Q. Were you given a copy of Exhibit Number
17 8?

18 A. I do not think so. If I was, it went on
19 to Gail, to Gail Jackson.

20 Q. Have you ever had a discussion with her
21 as to whether she ever received a copy of either
22 Exhibit 8 or a document that would have the same
23 sort of effect as Exhibit 8?

24 A. No. I don't believe I have.

25 Q. As best you are aware, is there any

1 possibility that you are the person who created
2 the 35 millimeter print of the Nix film --

3 A. You mean from --

4 Q. -- that you -- that you provided to the
5 Review Board?

6 A. That I was the one who had created the
7 print?

8 Q. Yes.

9 A. It's -- it's possible. I can't say that
10 it's impossible.

11 Q. To the extent that you created the 35
12 millimeter print, what would your source have
13 been?

14 A. Well, for the actual print, it would --
15 had to have been a negative.

16 Q. Did you ever have in your possession,
17 custody or control a negative of the Nix film?

18 A. That I don't know. If indeed I did
19 that, I must have had one. I do not at the
20 present time have one. I do not know that I have
21 one. I will look.

22 Q. Yes, please do.

23 A. Okay.

24 Q. When you say that you are going to look,
25 where is it that you will look?

1 A. I will-- I will check every roll of film
2 I have in my possession.

3 Q. Where are the films that you have now
4 that relate to the Kennedy assassination?

5 A. In my apartment.

6 Q. They're in Dallas now --

7 A. Yes, um-hum.

8 Q. -- is that correct? So those films have
9 all been moved from Boothwyn --

10 A. Yes, um-hum.

11 Q. -- Pennsylvania. Other than in your
12 apartment in Dallas, is there any other location
13 where you have stored films related to the Kennedy
14 assassination -- let me withdraw that and say,
15 other than with the Archives, which you previously
16 mentioned, and your apartment, is there any other
17 place in which you are now storing films relating
18 to the Kennedy assassination?

19 A. The only one I'm aware of, and it's an
20 individual one, would be the negative for the
21 slide set that we spoke about before. That one I
22 know I don't have with me. It was a big reel in a
23 very large can, so it's -- I know -- I'm pretty
24 sure I know where that is. That's in
25 Pennsylvania.

1 Q. Where is that in Pennsylvania?

2 A. In the house where I just moved from.
3 What I will do, I have to go up there at the
4 beginning of October. I will -- I will do a
5 search of everything that's up there. If I find
6 anything else, I'll let you know. But I'm sure
7 that that one is there.

8 Q. I'd like to turn to the Muchmore film.
9 Is it your testimony that EFX Unlimited had access
10 to the original Muchmore film?

11 A. Yes, um-hum.

12 Q. But you did not see the original
13 Muchmore film while it was at EFX Unlimited; is
14 that correct?

15 A. That's correct. I didn't work there at
16 the time.

17 Q. For the 35 millimeter version of the
18 Muchmore film that you provided to the Review
19 Board, was that material wet gated?

20 A. Yes. I'm sure it was. You can -- you
21 can see the liquid traveling on the frames.

22 Q. Do you know what kind of film stock the
23 Muchmore film was that you gave to the Review
24 Board?

25 A. Color print film.

1 Q. Do you know which brand --

2 A. No.

3 Q. -- which manufacturer?

4 A. No, I don't. I would assume it's, in
5 all probability, Kodak. But it doesn't
6 necessarily have to be. It depends on whatever
7 the lab was printing on in those days. Color
8 print film.

9 Q. Could you explain briefly what a contact
10 print is?

11 A. Okay. There are three different types
12 of film printing. Optical printing, which is you
13 use a series of lenses or a lens between the
14 original film and the copy. A contact print is a
15 continuous run of print where the original film is
16 pressed up against the unexposed film or raw stock
17 and is struck by light, and a contact print is
18 made that way. The third one is called a
19 precision print, which is very much like a contact
20 print except that it's not a continuous run. It's
21 an individual frame situation. It's halfway
22 between the two, but no lenses are involved.

23 Q. Do you know whether the 35 millimeter
24 Muchmore film that you delivered to the Review
25 Board was a contact print?

1 A. I don't know. I would assume it is
2 because very rarely are optical prints made.
3 Usually optical printers are used for negatives
4 and laboratories that do printing. Print houses
5 like TVC or Cine Lab or any of those movie labs in
6 New York, they almost always, almost exclusively
7 use contact printing.

8 Q. I believe previously in your prior
9 deposition you stated that the circumstances
10 through which you acquired the Muchmore film were
11 the same as those for the Nix film.

12 A. Yes.

13 Q. Is that a fair statement?

14 A. Yes.

15 Q. Did you ever have access to the camera
16 original Muchmore film?

17 A. Never. Never in my life.

18 Q. Did you ever have access to a negative
19 of the Muchmore film?

20 A. That I'm not sure of. I don't know. I
21 don't think so. I honestly don't think so, but I
22 can't rule it out. It's possible I might have.

23 Q. What -- when you say that you're unable
24 to rule it out as a possibility, what kind of
25 considerations are going into your mind?

1 A. Well, as I said, I received a lot of
2 materials from Mo Weitzman some years ago. I
3 don't remember what all those materials are. If
4 there was a negative for the Muchmore film, I
5 would love to have it because I would like to make
6 a print of it. I'd like to make a good print of
7 it. When we were looking for Zapruder negative,
8 we were also looking for Nix and Muchmore as
9 well.

10 To the best of my knowledge, I never had
11 negatives of either Nix or Muchmore. But if I say
12 I didn't and I did, I don't want to mislead you.
13 I have no recollection or no knowledge of ever
14 having one, not a first generation one. I know
15 that I made a copy negative from the print I was
16 given as a protection, which is a later generation
17 away from the -- from the print.

18 At the time, as I recall, I had only one
19 35 millimeter print of Nix and one 35 millimeter
20 print of Muchmore. I do believe that was all
21 there was. So anything that was created after
22 that point would have been a later generation and
23 anything that would have printed like 16
24 millimeter or anything else after that point would
25 be like two generations away.

1 Q. Did the HSCA have access to the original
2 Muchmore film?

3 A. I assume they did. I don't know that I
4 ever specifically discussed the Muchmore film with
5 them. The Muchmore film goes by very quickly. At
6 the moment of the head shot, there's a splice in
7 the film.

8 The Nix film is the one I was really
9 considering the most important at the time because
10 I knew there was something there, some information
11 there that would help the case. That's what I was
12 most concerned with.

13 I don't know that I ever mentioned
14 Muchmore to them. Besides, I already had a copy
15 of it.

16 Q. I would like to show you a document that
17 purports to be a listing of all of the original
18 films that were used by the House Select Committee
19 on Assassinations and I'd like to ask you to
20 identify whether you can see anything on the
21 listing that is inaccurate. I'll state for the
22 record that this comes from Volume VI of the
23 hearings of the HSCA. And, unfortunately, there
24 is not a page number on the photocopy that I have,
25 but it is Paragraphs 39 through 42 of the report.

1 They appear under a Section C entitled "Source
2 Materials for Enhancement". I have highlighted
3 the films that are suggested to be originals that
4 were in the possession of HSCA. Those that are
5 not highlighted were not in the possession of the
6 HSCA; that is, the originals were not in the
7 possession.

8 Mr. Groden, is there anything on that
9 list that you can identify as being inaccurate?

10 A. You mean just Section 5, dealing with
11 motion pictures?

12 Q. All of those --

13 A. The whole thing?

14 Q. -- that are highlighted. Any of those --
15 we'll start out with any of those that are
16 highlighted that you believe the HSCA did not have
17 access to the camera original film.

18 A. Some of these I have no way of knowing.
19 I know they had the original Mary Moorman
20 Polaroids. I know they had those.

21 I can't see anything that I -- there's a
22 notation about me here too. Okay. There is
23 nothing here that I see that I think is
24 inaccurate.

25 I know they had the original Towner

1 film. I know they had the original Dorman film.
2 They had the original Hughes film. And -- but Nix
3 and Muchmore, again, I have to take their word for
4 it because I didn't see those. And I know -- I
5 know that they had the original Zapruder film
6 because they were talking about it so often, that
7 they didn't want duplicates, they wanted the
8 originals.

9 I don't see anything here that seems to
10 be inconsistent with what I believed to be true
11 before.

12 Q. Okay. You make reference to the list,
13 but I'm going to go through some of the films and
14 ask you whether you yourself had access to the
15 originals of the films. These would not be things
16 that you heard about but you were able to perform
17 some sort of work.

18 A. Okay.

19 Q. First, the Altgens film.

20 A. Altgens is a -- is an individual
21 photograph. That's not a film.

22 Q. I'm sorry. Yes.

23 A. Yes.

24 Q. Betzner?

25 A. Betzner, yes.

1 Q. Bronson?

2 A. The work I did on Bronson I did before
3 they got it. They -- let me -- let me -- let me
4 modify that. What I was told, they had the
5 Bronson film, returned it to them. Then Bronson
6 came to me and asked me to do the work, which I
7 did. I did the work. And then, as I understand
8 it, it went back to them. So the work I did on
9 that was not while they had it. They got it back
10 again and sent it to Aerospace in California, as I
11 understand it, after I had it.

12 Q. Who sent the Bronson film to you?

13 A. Charles Bronson and Gary Mack and --
14 this is going to sound terrible because I have a
15 blank spot as to his name. A reporter for the
16 Dallas Morning News. Help me. This is terrible.
17 He's such a nice guy too and I can't remember his
18 name. He's going to hate me when he sees this. I
19 can't remember.

20 They sent it to me. They had -- they
21 called me up very excited that they found this new
22 film of the assassination. At the time I didn't
23 know that the HSCA had already seen it and
24 rejected it, said there was nothing there of any
25 value.

1 Q. Bell?

2 A. I believe they did have the original
3 Mark Bell film.

4 Q. Did you have access to that yourself?

5 A. I probably did. I think -- yes. I
6 would say yes.

7 Q. All right. Dillard?

8 A. The Dillard, again that's not films;
9 that's individual photographs. And those are the
10 ones that were damaged by them when they -- when
11 they applied the radioactive coding to them. Yes,
12 they had those.

13 Q. And you had access to those?

14 A. Yes, uh-huh.

15 Q. Hughes?

16 A. Hughes, yes, I believe they had the
17 original of that too.

18 Q. And did you have access to --

19 A. Yes, um-hum.

20 Q. -- the film?

21 Did you have access to the Jim Towner
22 slides?

23 A. Not through them. I don't think through
24 them. I got those from Jim Towner and Gary Mack
25 years earlier, as I recall. I don't think I got

1 those through the HSCA.

2 Q. Or the Tina Towner film?

3 A. The Tina Towner film, definitely from
4 the HSCA. I remember that.

5 Q. That you had access to that yourself?

6 A. Yes, uh-huh.

7 Q. Did you have access to the Elsie Dorman
8 images?

9 A. Yes.

10 Q. Did you yourself have access to the
11 Oswald backyard photographs?

12 A. The originals?

13 Q. The originals.

14 A. Not through the Committee. I got -- the
15 only thing I -- the only time I ever actually saw
16 the original backyard prints and negative was --
17 were in the National Archives, and that was years
18 before the HSCA. I do not believe I had any
19 access through the HSCA.

20 Q. Powell photographs?

21 A. Yes. They sent -- they gave me the
22 original Powell photograph to work on.

23 Q. While you were at the HSCA did you have
24 access to any other films that you are now able to
25 identify in addition to those that I just

1 mentioned?

2 A. Individual photographs? I had access
3 to -- literally to thousands, I would say
4 thousands of images, certainly several hundred.

5 Q. While you were at the HSCA.

6 A. Yeah, um-hum.

7 Q. In terms of films?

8 A. There were, as I recall, some things
9 that they had gotten from -- from television news
10 films, as I recall. I think large reels, of which
11 I don't know if I did anything with those. I
12 can't remember if I did. If anything, it was
13 transferred to video. But I really don't think so
14 because I don't seem to have anything like that.

15 Q. I'd like to find out about any other of
16 the -- if we can refer to them as the Dealey Plaza
17 assassination related films where you might have
18 had access to the originals. Previously you
19 mentioned that you had access to the Zapruder film
20 by Life Magazine; is that correct?

21 A. Yes.

22 Q. You've also mentioned that you had
23 access to the Bronson film when he sent that to
24 you --

25 A. Yes.

1 Q. -- is that correct?

2 A. Um-hum.

3 Q. Did you also have access to the Jack
4 Daniel --

5 A. Yes.

6 Q. -- images?

7 A. Yes. Jack Daniel, Gary Mack sent that
8 to me as well.

9 Q. And Willis slides, did you have access
10 to the original?

11 A. I don't believe I ever did have access
12 to the originals.

13 Q. For any of the Willis slides?

14 A. I don't believe so. I know the
15 Committee did some computer enhancement work on
16 Willis slides, but I had nothing to do with that.

17 Q. Mr. Groden, before we conclude today I'd
18 like to ask one additional time in regard to the
19 subpoena that was issued to you as modified. With
20 the exception of the films that you brought during
21 the first day of deposition and today and with the
22 exception of the ones that we have talked about
23 and I have asked you to go back and make a further
24 search on, are there any other early generation
25 films called -- films or photographs called upon

1 by the subpoena that you have possession, custody
2 or control of that you have not identified for me
3 in these depositions?

4 A. To the best of my knowledge, no.

5 Q. Do you have any objection to notifying
6 me promptly if you learn that you do have another
7 film or photograph that you had not previously
8 considered?

9 A. No objection at all.

10 Q. Okay. The assumption then will be that
11 you'll be under a continuing obligation, at least
12 for the life of the Assassination Records Review
13 Board, to notify us of any additional early
14 generation or original films or photographs that
15 are called for by the subpoena and letters of
16 limitation.

17 A. Okay.

18 Q. Is that fair? Thank you very much.

19 A. Okay.

20 [Adjourned 1:49 p.m.]

PAGE	LINE	CORRECTION	REASON
21			
22		GLOBAL REPLACE	
23		Effects Unlimited to EFX Unlimited	
24		Reiby to Reibe	Ektachrome to
25		mat to matte	Ektachrome
		loupe to lupe	
		Gail to Gayle	

1	PAGE	LINE	CORRECTION	REASON
2	8	18	See notes cut "the"	
3	9	10	cut "it's very"	
4	13	9	"Weisberg" not "Weissburg"	
5	15	18/19	cut "black and white"	
6	45	8/9	See notes	
7	89	13	"film" should be "videotape program"	
8	145	13	"TBC" should be "TVC"	
9	148	14	get the should be the got	
10	197	17	"was" should be "were"	
11	197	20	possession should be possession	
12	206	12	"it" should be "the liquid"	
13	121	25	{ d-Max not D-max	
14	222	1	"from the Best Evidence" should be "Great Evidence"	
15	224	14-15	See notes	
16	236	4 to 20	"Wakeford Arloff" should be Wakeford-Orloff	
17	238	3/9	contrasting should be "contrary"	
18	246	3	which is when you add them	
19	262	12	Cine Lab should be Cinelab	
20	263	5		
21				
22				
23				
24				
25				

I, ROBERT J. GRODEN, have read the foregoing deposition and hereby affix my signature that same is true and correct except as noted herein. and in the enclosed notes.

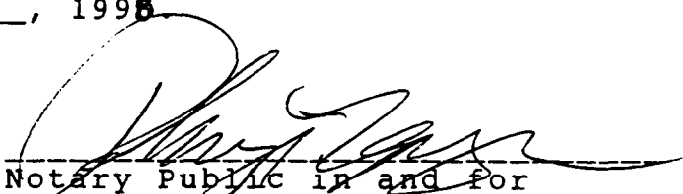

Signature of Witness

STATE OF TEXAS *

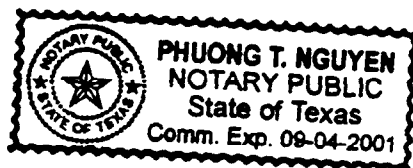
COUNTY OF DALLAS *

Subscribed and sworn to before me by the said

witness, ROBERT J. GRODEN, on this the 25 day
of June, 1998


Notary Public in and for
the State of Texas

9/4/2001



1 STATE OF TEXAS *

2 COUNTY OF DALLAS *

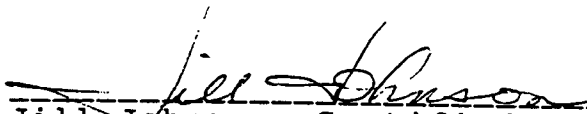
3 I, Jill Johnson, a Certified Shorthand
4 Reporter in and for the State of Texas, do hereby
5 certify that, pursuant to the Notice and subpoena,
6 there came before me on the 20th day of August,
7 1996, at 9:12 a.m., at the offices of the United
8 States Attorney, Dallas, Texas, the following
9 named person, to wit, ROBERT J. GRODEN, who was by
10 me duly sworn to testify the truth, the whole
11 truth and nothing but the truth of his knowledge
12 touching and concerning the matters in controversy
13 in this cause; and that he was thereupon carefully
14 examined upon his oath and his examination reduced
15 to writing under my supervision;

16 That the deposition is a true record of
17 the testimony given by the witness, same to be
18 sworn to and subscribed by said witness before any
19 Notary Public.

20 I further certify that I am neither
21 attorney or counsel for, nor related to or
22 employed by, any of the parties to the action in
23 which this deposition is taken, and further that I
24 am not a relative or employee of any attorney or
25 counsel employed by the parties hereto, or

1 financially interested in the action.

2 In witness whereof, I have hereunto set
3 my hand and affixed my notarial seal this 25th
4 day of August, 1996.

5
6
7 
Jill Johnson, Certified
8 Shorthand Reporter in and for
the State of Texas, CSR #259

9 Suite 22
10 3508 Greenville Avenue
Dallas, Texas 75206

11 My certification expires December 31, 1996.
12 My notary commission expires May 30, 2000.
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