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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PROCEEDINGS

Whereupon, ROBERT J. GRODEN was called for as a witness and, having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE ASSASSINATION RECORDS REVIEW BOARD BY MR. GUNN:

Q: Would you state your name for the record, please?

A: Robert Jacob Groden.

Q: What is your address?

A: 212 Emily Lane; Boothwyn, Pennsylvania 19061.

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

I'm accompanied here today by Laura Denk, who is a senior analyst with the Review Board, as well as by Douglas Horne, who is a senior analyst for the Review Board. Also present in the room is Mr. Charles Mayn, who is affiliated with the National Archives.

Mr. Groden, I would like to remind you, as we discussed shortly before the deposition began, that this deposition is being conducted pursuant to both the subpoena that was issued to you, as well as being under the auspices of the federal perjury statute. It is important during the course of the deposition that you tell the truth and the whole truth, as you have sworn.

Mr. Groden, do you remember that I have informed you that you are entitled to have counsel here today?

A: Yes.

Q: And did you make the decision not to have counsel?

A: Well, I certainly can't afford counsel.

So, even if I wanted to, I couldn't.

Q: Mr. Groden, could you describe for me the general background you have in areas related to photographic record related to the Kennedy assassination?

In 1969, I started working for a Miller Reporting Company (202) 546-6666 Min-U-Script®
Q: Could I interrupt you there for a moment?
A: Sure.
Q: What was the name of the person for whom you worked at EFX Unlimited?
A: His name was Mo Weitzman. And he showed me the copy that he had kept—the mechanic's copy that was left over from the work that they had done to the film.
Q: If I can interrupt you again.
A: Sure.
Q: Was the mechanic's copy a 35 millimeter?
A: Yes, it was.
Q: And was that a positive or a negative?
A: Positive.
Q: Was it your understanding that that 35 millimeter positive was taken—or copied directly from the original, or was there an intermediary step?
A: There would be a negative involved.
Q: So, the mechanic's copy would have been a second generation. Would that be fair to say?
A: That's correct. It would be—It was a test print from the copies that they had made from the original. At that time no one, to my knowledge, had ever taken an eight millimeter film—an original, regular eight millimeter film and blown it up to 35 millimeter.
They had described the steps that they went through, in order to make it—how involved it was. They had to take the bellows off the camera, extend it beyond its usual range, refocus it, and shoot it in the dark at a very, very long exposure time because of the degree of blowup.
And it is my impression that they made several negatives for Life magazine. They did not keep any of the negatives. All they had was one test print that had come back.
Q: Just so I'm clear here. There were several—it was your understanding that there were several negatives made from the original—camera-original Zapruder film?
A: Right. On the roll itself, it said "third take". On this particular print, it said "third take". So, I assume that they made at least three negatives. Probably at different exposures, to get the best exposure.
Q: And would it be fair to say that you have never seen any of the originals taken directly from the camera-original Zapruder film?
A: I have seen the Secret Service copy. The HSCA people told me that it was the Secret Service's original duplicate copy.
Q: Okay.
A: Let's see. Anyway, Mr. Weitzman showed me the film—hand-held. A 21-second film in 35 millimeter is virtually impossible to project. It's very, very difficult, and goes by very, very quickly. The original film was shot at 18.3 frames per second. And all 35 millimeter projectors play back at 24. So, it would play back at about a third to a half again as fast as it was originally taken.
Anyway, Mr. Weitzman granted me access to the print, to make optical effects copies. What I did is, I stabilized the film. The original Zapruder film is very shaky. You know, Abraham Zapruder was an older man. He had vertigo. He had to be held up by his secretary, Marilyn, to keep him from falling over. So, the President, in successive frames, would appear all over the film. And it made it virtually impossible for anybody to examine what was going on.
What I did is, I stabilized it. I zoomed in, as close as I could get; and I re-photographed the film one frame at a time, and repositioned the...
President, so that he was now rock steady in the center of the image. Now, for the first time, you could actually see what was happening to him. The eye didn't have to travel all over the screen, because by the time you got to where he was in one frame—by the next frame, he was somewhere else. This created a situation whereby what happened in the film—which was captured—the images that were captured on the film could be viewed and analyzed for the first time.

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

Q: If I can ask you a couple of questions.
A: Okay.

Q: First, what time did you perform the stabilizing; that is, what year approximately?
A: It was over quite a period of time. I did it several different times. But, initially, I would say probably 1969 or 1970.

Q: Is the term for stabilization either 'rotoscoping' or 'Grodenscoping'?
A: Rotoscoping is a different term. What it—what rotoscoping means, basically, is to match a position using a source to align. The term 'Grodenscoping' I didn't make up. I was using the term as—it's a modification of the rotoscoping technique that I had used. And somebody in Texas came up with the term 'Grodenscoping', and it sort of stuck. There is no official term 'Grodenscoping', except for what I did. So, if it's got to be called anything, it may as well be that, I suppose.

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

Additionally, on some of the copies I made, I multi-framed it. In other words, since the film goes by so quickly, it's, again, difficult for the mind to perceive what's going on in the film. So, by double framing it. I slowed it down to half speed. And, therefore, it's as if the car were going slower, and the mind can more easily grasp what's going on. I didn't do that in all the copies, but I did do it in some.

Q: Is that term also called 'step framing'?
A: Yes.

Q: Okay. Approximately how many different times did you do either a Grodenscope or a variation on rotoscoping?
A: I don't have the slightest idea, honestly.

I did many different versions of it. I did it of the President. I did it of Mrs. Kennedy. I did it of Governor Connally. I did it of people in the background. There's just many different versions of it. Again, it was done as an examining type of exercise.

Q: Was each time that you did either the rotoscoping or the Grodenscoping on that same 35 millimeter test positive that you obtained from Mr. Weitzman?
A: Yes.

Q: Okay.

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

Q: Do you remember the names of any of the researchers whom you showed the film to?
A: Harold Weisberg, Jerry Policoff. There were others. I'm not really sure which ones.

Eventually, David Lifton, Richard Sprague—

Q: Which Richard Sprague is that?
A: The computer analyst. The computer—'analyst', I don't think is the right word. Not the one who was the chief counsel of the Assassinations Committee.

I'm sure there were others. Members of the Assassination Information Bureau in Boston, Robert Katz, Robert—let's see, Robert Solomon, Harvey Yazigian, and others.
Finally, in November of 1973, for the tenth anniversary of the assassination, there was a symposium held at Georgetown University in Washington. And I was asked to present the film. Oh, I actually left something out that doesn't relate to the Zapruder film. So, I'll get back. And I'll add that in a minute. I was asked to present the films—"The Assassination Films" at that conference. And it took several people quite a while to convince me to go ahead and do it, but I did. I did show it there. There was no press coverage, and it never went beyond that. Nobody ever reported it. It just—Nothing happened. Prior to that point, we had been working on the movie "Executive Action." And for "Executive Action" since I had done the work on the Zapruder film, I was approached and asked to—you know, if I could do the same sort of thing with the Nix and Muchmore films. The producers had licensed the Nix and Muchmore films from UPI at the time. They couldn't use the actual assassination footage, but they could use the stuff just before and just after. And they used actors for the actual assassination. And although I was not involved in the actual duplicating of the films for the movie, it was done at EFX Unlimited, which was the company that I had worked for prior to that point. I had made the connections for them—gotten UPI and the producers together with EFX Unlimited, and they made the copies for the film. Q: Did EFX Unlimited have access to the camera-original Nix and Muchmore films? A: Yes. And there's a footnote to that. When the films were delivered to them, what they received was the original Nix film—the color original Nix film. But the copy of the Muchmore film that they got was a black and white copy. It was a duplicate. It wasn't the original. And they called me about that. And I said, "No, no. The original film was color. It was not black and white." And they went back, and they searched and searched and they finally found it. And what they found was that the film was in two pieces. Somebody had physically cut the film at the frame of the head shot. What Mr. Weitzman had done at that point, in order to save the film—to prevent it from losing frames is, instead of doing a professional cement splice, which would have cost them at least two frames, he mylar spliced it — took mylar tape and spliced it. The alignment on that particular frame is not exacting. And because of the cut, there is a white bar—a space that exists in that frame. But he was able to save the film without losing the frames on that. Q: All right. During the time that the Nix and Muchmore films were in the custody of EFX Unlimited, did you, yourself, ever see the original films? A: No. Q: Did you play any role at all in terms of processing, developing, enlarging, enhancing the Nix or Muchmore films while at EFX Unlimited? A: No. Q: Who, at EFX Unlimited, was involved in the photographic work on the Nix and Muchmore films? A: That, I don't know. I wasn't there. I was informed that it was going on. I was told that it was, indeed, happening. But the owners at UPI apparently were very, very upright about it. They had somebody there with it at all times, and wouldn't leave it. And the—That's what I was told, anyway. And I always found it very curious that they had allowed the Muchmore film to be mutilated the way it was; that it had been cut. But by now, they were very protective of it. Q: Okay. A: In any case, the same sort of thing happened—with the Nix and Muchmore happened with the Zapruder film. You know, mechanic's copies, test prints were saved. They—you know, they wouldn't be thrown away. Thank goodness. Historically, as it turns out—where Nix
is concerned, particularly—it's extremely important, because now that WTN—the last people who had the Nix film have claimed that they've lost it. The only existing clear copies that exist—that are known to exist at this point are the copies that I have—the ones that were—the mechanic's copies that were given to me. As a matter of fact, I supplied copies of those to the Nix family, so they would have copies of the prints.

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

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

Q: Did you, yourself, ever see the negatives?

A: No.

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

A: No.

Q: Is that correct?

A: Never.

Q: Okay.

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

Q: So, your optical printing work, then, was with a second generation positive —

A: Yes.

Q: — is that correct?

A: That's correct.

Q: Did you perform the work of Grodenscoping at EFX Unlimited labs?

A: Yes.

Q: Did you need to obtain the authorization from anyone at EFX Unlimited to use their facilities?

A: Yes.

Q: And whom did you get the permission from?

A: From Mr. Weitzman.

Q: Okay.

A: Through the years, other researchers that had copies of other films relating to the assassination had sent me copies to study and work with, but they were very inferior copies—very inferior quality duplicates from the originals. And the results of what I was able to do with those were extremely unsatisfying. They were very contrasty, very blurry, very soft focus. And those were not of any real value.

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

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

Many of those are just copied onto videotape, and didn't have film copies of. In some cases, I did. I'd sent them to a lab and have a duplicate made. Things of that nature.

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

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

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

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

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

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

[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
[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

Page 23

[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.

Page 24

[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
[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
[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,

Page 25

[1] which I did. And as a result of that, Congressman
[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
[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
[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.
And, officially, that’s where the case has remained ever since—with people torn apart. Do they believe the acoustics evidence, or don’t they? And that’s it.

Q: Approximately, how large is your photographic collection from the materials related to the assassination?

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

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

Q: This may be difficult to actually describe in quantitative terms; but, if you could, do the best that you can to describe what the total volume is of material that you have related to the assassination, either in file drawers, or boxes, or whatever way makes the most sense.

A: There are literally thousands of photographic images. Many of them duplicates. Many of them shot years later. Some are recreations of events that happened at the time. Many are things that I took during the filming of Oliver Stone’s movie “JFK”. Some are copies from books and magazines. Some are duplicates of originals that had been loaned to me, or copies of copies of originals, and like that.

At this stage, it’s virtually impossible for me to tell what’s what. It’s very, very difficult. The majority of the stuff is not correctly filed.

But one thing that I mentioned to you on the phone and again before we started this, I don’t have any camera originals from Dealey Plaza—from the actual assassination. Everything that I have is duplicates of other people’s stuff.

For instance, the Altgens photographs. I have copies of all the Altgens photographs, but the originals exist. Possibly better copies of this. They made copies of all of those for the House Assassinations Committees. So, their files contain the best positive images of those negatives.

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

They had gone to the most prestigious photographic outfits in the country—RIT, Aerospace, I guess, Kodak—Eastman Kodak, all of them—and they tried to bring out the frame pattern—the image pattern in the shirt. And they all failed. They couldn’t come up with a conclusion.

And then they gave the negative to me.

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

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

So, I had proved myself wrong—which didn’t bother me. If someone was going to prove me wrong, I’d rather it was me than someone else.

Q: We all feel that way.

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

Q: If I could ask one just clarifying question.
A: Sure.

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

A: Yes. They had the full set of the originals.

Q: Okay.

A: They had actually gained access to originals of virtually everything that they wanted. They had the original Zapruder film—which they wouldn't let me see or touch, unfortunately. Although, there was a period in the early 1970s where I was allowed to examine and handle the original film at Life magazine's offices.

I was working on a documentary project that never came to be, and we were bidding on the film. And they kept jacking the price up. They started at $10,000. And then when we finally raised the money to go to $10,000, then they raised it to $20,000. And then when we agreed to $20,000, they went up to $50,000. And it was just insane.

We were playing tag with it.

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

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

A: At that time? No.

Q: At that time, or at any other time?

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

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

Q: Mr. Silverberg is the Zapruder's lawyer; is that right?

A: Yes.

Q: In case I forget —

THE WITNESS: I specifically want to address you on this. The slides that are in the National Archives of the Zapruder film—the later frames are misnumbered. From a specific point, they're off by one. And I don't know which direction they go in, but I remember noticing that; that they are not correct.

MR. MAYN: Okay.

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

I would also suggest that if the Committee—

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

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

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

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

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

And what I would recommend is doing this project that I had requested—I guess, almost 15,
BY MR. GUNN:

Q: If we could go back to the collection that you have, do you keep your photographs or images in—Well, let me try it a different way. Where do you keep your photographs and images?

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

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

A: No. I wish I did. I don't.

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

A: No.

Q: Have you ever entrusted your images to another person to keep for you?

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

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

Q: When did you approach the Sixth Floor Museum?

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

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

A: Videotape copies, yes. But not the original films.

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

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

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

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

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

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

[Deposition Exhibit No. 1 marked for identification.]

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

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

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

MR. GUNN: That will be marked Exhibit 2, please.
THE WITNESS: First is a reel—from its length, I would say probably several takes—of the Zapruder film. And there appears to be one splice in it.

BY MR. GUNN:
Q: Does that correspond to number one on Exhibit 3?
A: Yes, it does. It is an Ektachrome copy of the original Zapruder film.
Q: And is that 16 millimeter?
A: Yes, it is.
Q: Are there any identifying marks on the tape that would specifically identify it as being your film; that is something in your handwriting or any identifying number or date?
A: There—I had written in print the words "Zapruder first-generation Ektachrome projection print". And from the nature of this, it was probably written on there many years ago.
Q: Could you estimate approximately when you prepared the film that’s marked as the first entry on Exhibit 3?
A: No. I have no idea. I would say probably late 1960s.
Q: Would it be fair to say that the film was created prior to the time of the House Select Committee on Assassinations?
A: Oh, yes.
Q: And when you called it "first-generation Ektachrome", what did you mean by "first generation"?
A: It is made directly from the 35 millimeter print that I was allowed access to.
Q: And, as I believe you stated before, the print was actually itself a second-generation copy; is that correct?
A: That is correct. Which would make this a third-generation copy.
Q: Okay. Could we go to the next film, please?
A: Okay. The next one is an Ektachrome master copy, first generation—Well, I have to give a background on this.
When the Zapruder film was originally...
item number two on Exhibit 3?
A: Yes. This is a copy of the Secret Service copy of the film. In other words, this is one of the surviving two intact copies that has the frames that are missing from the original film.
Q: Okay. So, if I can try to recreate the provenance of the film, there is the original—the camera-original Zapruder film. From the camera-original film, there was a first-generation copy made. There were three prints, total.
Now, is the film that you’re holding in your hand—number two on Exhibit 3—one of those Secret—or one of those first-generation prints; or is this a copy from that first-generation print?
A: This is a copy of one of those prints. Those prints were all eight millimeter. This copy is 16 millimeter.
Q: Okay. So, the film that you’re holding in your hand—again, number two on Exhibit 3—is then itself a third-generation copy; is that correct?
A: This is correct.
Q: Where did you obtain the film in your hand?

Q: So, we will say, then, that that is a second-generation print made from a first-generation print, which was made from the camera original.
A: That would be the most accurate way of doing it.
Q: Could you identify the next film?
A: Next is number three. That’s a 35 millimeter color print of the Nix film. It came to me via Mr. Weitzman at EFX Unlimited. To my knowledge, this is the only surviving copy of the film made directly from the original, although this is a print. The negative, which must exist somewhere, is a generation closer to the original than this.
Q: So, if I’m clear, is the film that you’re holding in your hand now a copy made from the negative, or is it a copy made from the camera original?
A: This is a copy from the negative, which was made from the camera original. So this, again, 22 would be a second-generation item.
[Q: Where did you obtain the film in your hand now that—Actually, let me withdraw that.

I assume that the film that you’re discussing now would be item number three on Exhibit 3; is that correct?

A: This is correct.

Q: Where did you obtain item three?

A: This was given to me by Mr. Weitzman.

Q: Approximately, when was it given to you by Mr. Weitzman?

A: I think, sometime during 1973. It had to be before November of ’73, because I did show it at Georgetown University at that tenth anniversary symposium I told you about before.

Q: Are there any identifying marks or words that would help —

A: I don’t believe so. I wrote “Nix print” on the tape that’s on that, but I wrote that on just a couple days ago. I don’t—As far as I know, there aren’t any—

No. No, there’s nothing written on the leader at all.

Q: Could you go to the next film, please?

A: Then the next is the Muchmore film, a film taken by Marie Muchmore. That also is a color print. And the generation here would be identical to that of the Nix film.

Q: That is to say that the copy which you are—which is in your hands now was taken from the negative that was, in turn, taken from the camera original?

A: This is correct.

Q: Where did you obtain the Muchmore film?

A: The same situation as the Nix film. From Mr. Weitzman.

Q: And just so the record is clear, you’re now referring to number four on Exhibit 3; is that correct?

A: That is correct.

Q: Are there any identifying marks on the tape?

A: Nothing on the tape. As a matter of fact, I wish I had a longer piece of tape. This one is a little old. But the leader itself says “Groden.”

Q: Approximately, when did you obtain this film from Mr. Weitzman?

A: Probably the same day as the Nix film.

Q: Could you turn to the next film you brought today?

A: Okay. Can I put these back into their correct containers?

Q: Sure.

A: I appreciate that.

MR. MAYN: I think we’re clear on relating these pieces to the list, particularly the first two. They’re both 16 Ektachromes.

THE WITNESS: Right. Well, this one says “Secret Service.”

MR. MAYN: Okay.

THE WITNESS: And that’s the intact one.

MR. MAYN: Intact—just to be sure that we can relate the pieces to your list.

THE WITNESS: Okay.

MR. GUNN: We can go off the record for a minute.

[Discussion off the record.]

BY MR. GUNN:

Q: Mr. Groden, what is the next film that you brought with you today?

A: The next one is the Bell film—something that I marked “Bell.” And this is a 35 millimeter color print, also.

Q: What generation copy is the Bell film?

A: The Bell film would be the same generation as—Actually, let me think. You have the camera original. It would be second generation.

Q: Where did you obtain the Bell film?

A: I’m not sure where this one came from, because I’ve had the original—well, I’ve had sources in my hands several times. This one may well have come through the House Assassinations Committee.

Q: When you say that you’ve had “sources” in your hands many times, what do you mean by that?

A: I had copies of the Bell film prior to the House Committee, but I didn’t have the original to work with. When I was working for the House...
111 Committee, I had the original film. And I do believe that that's where this one came from.

The one — it says "very good color print". The copies that were made prior to that point were very bad quality. So, I'm convinced that this did come from the House Committee.

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

A: The camera original.

Q: Do you know where the camera original to the Bell film is now?

A: I assume that the House Committee returned it to Mark Bell.

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

A: That is correct.

Q: And is the color print a color positive?

A: Yes. "Print" means positive.

The House Committee had the negative. The negative was turned over to them with their prints — print or prints. I don't remember how many were made for them.

Q: Do you know where the negative is now?

A: I assume, it's in the National Archives.

You'd know better than I do.

BY MR. GUNN:

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

A: Yes. The next one is the Hughes film, and the Hughes film is also a 35 millimeter color print.

Q: Where did you obtain the Hughes film?

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

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

A: There is an intermediary negative.
[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?
[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?
[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?
[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?
[22] is probably a few weeks.

[23] Q: Where did you have access to that?
[24] A: It was sent to my house in New Jersey.
[25] Q: Do you have photo lab equipment at your
[26] house in New Jersey?
[27] A: Yes. That's not where I did the work on
[28] the film. The film was done, again, at EFX
[29] Unlimited in New York.
[30] Q: And that work was done approximately 1978?
[32] Q: What is the next film that you brought
[33] with you today?
[34] A: The next one is the last one. And it's
[35] the Dorman film, a film taken by Elsie Dorman.
[36] Q: Would you describe the Dorman film,
[37] please?
[38] A: Thirty-five millimeter color print.
[39] Q: Where did you obtain the Dorman film?
[40] A: From the HSCA.
[41] Q: Did you have access to the camera-original
[42] Dorman film while you were at the HSCA?
[44] Q: Did you have access to a first-generation
[45] negative of the Dorman film at the HSCA?
[47] Q: Do you know where the original—camera-original
[48] Dorman film is now?
[49] A: I assume the House Committee sent it back
[51] Q: Do you know where the first-generation
[52] negative of the Dorman film is?
[53] A: I would assume it's in the National
[54] Archives. Everything that I made for the
[55] Committee—all of these items, whether they were
[56] still photographs or whether they were films, were
[57] all turned over to Jane Downey at the House
[58] Committee and/or Michael Goldsmith. As I
[59] recall—and I'm certainly not clear on it—I would
[60] say, most probably Jane Downey.
[61] Q: Other than Mr. Goldsmith and Ms. Downey,
[62] was there any other person at the HSCA from whom
[63] you obtained photographic materials for your work?
[64] A: As I recall, no. We're going back to the
[65] mid and late 1970s, so I can't be 100 percent sure
[66] that there wasn't anybody else. But as I recall,
[67] everything went through them.
[68] Q: Did anyone at the HSCA give you permission
[69] to make a copy of any of the films for your own
[70] personal use?
[71] A: I had permission to make copies of all of
[72] them, yes.
[73] Q: Who gave you the permission?
[74] A: As I recall, it was both Mr. Goldsmith,
[75] Jane Downey. And I believe that they cleared it
[76] with Professor Blakey. Professor Blakey certainly
[77] knew, because he had me make copies for him, as
[78] well.
[79] Q: For his personal possession?
[80] A: Yeah. And the copies that he had were
[81] ruined or destroyed through the years. He came
[82] back to me years later and asked me to make
[83] additional copies for him from mine.
[84] Q: Approximately, when did he come back to
[85] you to make additional copies?
[86] A: I don't remember. I believe, I was still
[87] living in New Jersey at the time. It would have
[88] been about 10 years ago—10, 11 years ago.

Page 54 - Page 57 (16)
Q: So, very roughly, in the mid 1980s, is that fair?

A: Approximately.

Q: Did you make additional copies for Mr. Blakey at that time?

A: Yes. Specifically at that time, I remember it was a Secret Service copy. He was trying to do something with a Secret Service copy of the Zapruder film. And the lab they had sent it to had destroyed it—had torn it apart or something.

Q: Do you know of any other person affiliated with the HSCA who kept copies of photographic images in their personal possession, other than yourself and Mr. Blakey?

A: I would have no knowledge. Nobody told me.

Q: When you made the copies for Mr. Blakey in the mid 1980s, did you make them from the films that you brought with you to this deposition today?

A: To the best of my knowledge, yes. I feel sure that the—The one I remember specifically—It may have been the only one, or there may have been more.

The one I remember specifically was the Secret Service copy of the Zapruder film. And this is the master. This is the one that was made directly from the Secret Service copy. So, this is the one I would have used for Professor Blakey, yeah.

Q: When you say "this", you're pointing to number two—

A: Number two.

Q: — of Exhibit 3; is that correct?

A: Yes.

Q: Mr. Groden, in addition to the films that we have just itemized, did you bring any other materials with you today pursuant to the subpoena which has been marked as Exhibit 1?

A: No. Based on our discussion on the phone the other day, you said that you were interested in items that were shot in Dealey Plaza and as close to the originals as possible. And these are the films that exist from the plaza.

Q: Could you describe for me—and I'll specify this as we go along—other films that you had that you did not bring with you today to the deposition? Let's maybe go through the list that I've handed to you.

A: Oh, okay.

MR. GUNN: Which I'll ask the reporter to mark as Exhibit 4 to the deposition.

THE WITNESS: The original.

BY MR. GUNN:

Q: The original. It contains yellow highlightings. And then you can just continue to refer to it.

[Deposition Exhibit No. 4 marked for identification.]

BY MR. GUNN:

Q: The first one that you see there is the Abraham Zapruder film. Now, you brought two—

A: That is correct.

Q: — two with you. Do you have any other early-generation copies or negatives of the Zapruder film?

A: I don't have any early-generation negatives at all. And to the best of my knowledge, this is the closest to the original that I've got. The Secret Service copy—again, which is the intact copy—I know for a fact, this is the youngest generation I've ever had.

Q: Could you turn to number two?

A: That's the Nix film. And what I've got here is my only existing—

Q: I'm sorry. Number two on the list, Exhibit 4.

A: Oh, I thought just the ones that were highlighted.

Q: No, I'd like to go through all of them.

A: Oh, okay.

Q: From number two, autopsy photographs, what is the earliest generation original source you have for autopsy photographs?
A: Fifth. Fifth generation. Maybe more. At
least fifth, maybe sixth or seventh.
Q: And you have those in your house in
Boothwyn, Pennsylvania?
A: Yes.
Q: Now, in my reading of the subpoena, the
autopsy photographs were called for.
A: They were initially called for, but they
weren't mentioned in the—in our conversation the
other day.
Q: As I mentioned to you in the conversation,
as recorded in the letter, the limitations on the
scope of the subpoena are only those that are
explicitly recorded in Exhibit 2. And from my own
personal recollection, I explicitly stated during
the conversation that I did want autopsy
photographs.
A: The William Allen photos were photographs
of the tramps being arrested. Those were—there
were two or three of them, as I recall. I don't
know how early mine are. Several of them were
copied from books.
Q: Do you have any photographs or images from
the William Allen that are earlier generations than
any that you might have photocopied—or copied from
books?
A: I don't know. I honestly don't know. As
I recall, there's a total of seven photographs of
the tramps. And I don't know which were taken by
who. It was George Smith, William Allen, and Jack
Beers. And I'm not sure who took which.
Q: When you go back to your house, in
addition to obtaining the early autopsy
photographs, I would also like you to bring any of
the tramp photographs that you have, to the extent
you have any generation earlier than one that you
might have taken from a published source.
A: Okay, let me write these down.
Q: Why don't you take a list, if you would.
That would be helpful for you.
A: Okay.
Q: The next one on the list is James Altgens.
What is your earliest-generation Altgens
photograph?
A: The House Committee had first
generation—had the original negatives, the camera
negatives. And I made film positives and prints of
Q: Then you have both first and second
A: I probably have second. The majority that
I've got, I would think, would be first-generation—either
film positives or photographs
would both be from first-generation positives.
Q: Okay. We'd like you to bring those with
you, as well.
A: May I ask a question?
Q: Sure.
A: If the first-generation copies I made for
the Committee are in the Archives, why would you
need my copies?
Q: We would just like to examine them.
A: Oh, okay.

BY MR. GUNN:
Q: Look at the next one on the list, please, the Thomas Alyea film. What is the earliest
generation copy that you have of the Alyea film?
A: I don't know. I had a multigeneration
copy, which was rather contrasty. And I don't have
any idea what the source was. It was much later
than the original.
Q: Have you ever had access to an earlier
source?
A: Not that I'm aware of. I've seen—I have
seen Alyea footage—earlier prints that I did not
have access to, which had footage that I had never
seen before. But it was definitely his film.
Q: Okay. We'd like you to bring that—your
earliest generation of the Alyea film, as well.
Have you ever seen the original Alyea film?
A: The camera original?
Q: Camera original.
A: Not that I'm aware of, no.
Q: For Jack Beers, do you have any early-generation
copies?
A: You mean of the tramp photographs?
Q: Yes.
A: Because he took hundreds of photographs
that day.
Q: Of the tramp photographs.

A: No. As far as I know, the House Committee
didn't have the originals. The only copies I've
got of the Beers photographs came from books.
Q: If the only copies that you have of the
Beers photographs are from books, you do not need
to bring those with you.
A: Okay.
Q: The next one is the Hugh Betzner. Do you
have any early-generation copies of the Hugh
Betzner photos?
A: Yes.
Q: What do you have?
A: I have prints that were made off of the
originals. I believe, they were the originals—or
they could have been from second-generation
negatives from prints.
Q: Where did you obtain them?
A: I don't recall, to be honest with you. It
could have been the HSCA.
Q: We would like you to bring those with you.
The next one, Wilma Bond photos. What is
the earliest generation you have of Wilma Bond?
A: They were copy slides from copy
slides—that may have been from copy slides. So,
what I've got is either—They weren't the
originals. So, it would be second, third, or
fourth generation.
Q: Where did you obtain your copies of the
Wilma Bond photos?
A: From researchers through the years. I
have no idea. I can't remember which is which.
I've gotten copies from other people. Yeah, that
looks like that.
Q: We would like you to bring the earliest-generation
Wilma Bond photos that you have. Do you
know whether the HSCA had access to the originals?
A: I don't think so. I don't know. They
probably could have. It's possible they did.
Q: Other than the Zapruder camera original
which you mentioned earlier, were there any other
photographic materials available to the House
Select Committee to which you did not have access?
A: Did not have access to Zapruder, Nix, or
Muchmore originals. I had requested, specifically,
Q: Other than those three films, were you permitted access to all of the photographic materials available to the HSCA?

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

Q: When we say “access”, do you mean viewing them or duplicating them?

A: Viewing them.

Q: Viewing them.

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

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

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

And I don't know which is which.

Q: Okay.

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

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

Q: Okay.

A: On the next one, the name appears two different ways that I have seen. One is Harry Cabluck, and one is Tom Cabluck—I believe.

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

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

A: I don't think so. I don't think I do.

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

Q: The next one, Malcolm Couch. What is the earliest generation copy you have of Malcolm Couch?

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

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

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

Q: We would like you to bring the earliest generation that you have.

A: Of the Couch film?

Q: Malcolm Couch, yes.

A: It's on a U-matic tape, and I don't know where it is. The U-matic tape is literally falling apart. If you try to play it, you'd probably damage the machine. I had to run it something like 20-odd times. And every time I tried to run it,
Q: But it was from that tape that you made a subsequent videotape?
A: Yeah, but it’s much clearer on the duplicate tape than it is on that. It would be much safer.
Q: How could it be clearer on the duplicate tape than on the original?
A: Because when you try to run it on the original, it clogs the heads. It’s falling apart.

There was a series of tapes, as it was explained to me, that the formulation of the coating was defective. And when I made a copy from a borrowed print back in the 1970s, it was on one of those defective tapes.

Now, the tapes are not logged, so I don’t know which tape it would be on. And if I try to run them, I’m going to damage the machines. But the original—the film that it was made from—that any of them were made from—should be available through the Grinberg Library in New York.

Also, I believe, if I’m not mistaken, there’s a copy of it in the SMU Archive in Dallas, because Oliver Stone licensed it from them, if I’m not mistaken.
Q: We would like you to make a search for the Malcolm Couch film, to the best extent that you can.
A: Okay.

Q: Next, with Robert Croft.
A: Robert Croft. The only copy I’ve got is from the printed page in the HSCA volumes.
Q: Did you ever attempt to make a copy—Oh, that was the film that you did not have access to; is that right?
A: Right. I’m not even sure what the original was, whether it was a Polaroid or a negative.
Q: You won’t need to bring Robert Croft with you. The next one is—
A: By the way, if I may interject, the House Committee published the Croft photograph in black and white. And I always thought it was black and white. But when I was in the Archives last year, I saw what was a color slide.
I was not an original, I don’t believe.
I believe it was a duplicate. But if you need to see the Croft photograph, a much younger generation than anything I’ve ever come in contact with is there.
Q: Okay. For the Jack Daniel film, what is the earliest generation that you have?
A: Jack Daniel, I have first-generation copies directly from the original.
Q: Where did you obtain the copies from the original?
A: From Jack Daniel himself.
Q: We would like you to bring that when you return.

The next film is the DCA film. We did discuss that somewhat earlier. Could you remind me of what the earliest generation that you have of the DCA film is?
A: I have to think about that. I’m not sure.

I have an early-generation copy of it. I have the copy that was made—which I made for the House Committee, as a matter of fact—directly from the original film. But I’m not clear what the generation of—what mine is. Probably, I’d say first, second, or third.

Q: What were the circumstances under which you obtained the DCA film?
A: Well, the Committee had gotten copies from someone who had been involved in DCA, and they were all copies of release prints.
And years earlier, I had discovered that the original was still in the hands of Life magazine, and had seen it up there. And I informed the Committee about it, and the Committee contacted Life and got the original film from them.
Q: Did you attempt to make a copy directly from the original in the possession of the Committee?
A: Yes. So, I’m pretty sure—If I made a negative and then printed the negative, then, what I’ve got is a—I’ve got a print, which would be
second generation.

If it was made as an Ektachrome, then,

what I've got is either the original Ektachrome or

copy of the Ektachrome. That's why I'm not sure

what generation I've got.

Q: We would like you to bring that.

A: That one, I can't bring today, because I

don't have it with me. It's in the lab. I'm

having individual frames blown up. It's been at

the lab for sometime.

Q: Which lab is that at?

A: It's at a lab called Buckley's. Buckley's

Lab.

Q: Where is Buckley's Lab?

A: In Delaware.

Q: Do you have any other films related to the

assassination that are at Buckley's Lab?

A: No.

Q: Do you have any films related to the

assassination that are at any lab other than

Buckley's?

A: No.

Q: We would still like to obtain the version

of the DCA film that you have. We can make

arrangements to transfer that at a subsequent time,

that is called for by the subpoena. So, we

won't be expecting you to produce that today, but

we still will want to see it.

A: Okay.

Q: The next one on the list is Tom Dillard.

Do you have any early-generation Tom Dillard

photos?

A: No. The stuff—When the Committee

borrowed the Dillard photographs, they subjected

them to radioactive analysis. And the people that

did it neglected to take the radioactive coating

off the films. They destroyed the negatives.

So, the copies that are in good shape that

I've got—the ones that have the image on them—all

came from books or previous prints.

Q: We would not be interested in any that

came from books, but we are interested in any that

came from previous prints.

A: Okay. Now, those original negatives were
photographs on pages 208 and 209?

A: Yes, there's copies on both.

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

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

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

A: That came from a book.

Q: Which book did that come from?

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

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

A: That's correct.

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

A: I believe, a transparency. I believe it was from a transparency made from the original negative, but it was after the damage was done.

Q: Where is the transparency that was made from the original negative?

A: The ones that these photographs came from?

Q: Yes.

A: I have those somewhere. Those are somewhere in my collection.

Q: Okay.

A: That would require a search to find them, though.

Q: Okay. Those are photographs that we are interested in.

A: Okay.

Q: And just so it is clear, we would like you to bring those to the deposition.
them. Before I'd release them, he got permission from them.

[3] Q: Do you still consider those Mary Moorman photographs that you have to be your property?
[5] Q: Maybe I'm misunderstanding. Did you lend your personal property—i.e., the Mary Moorman photographs—to Gary Mack?
[6] A: No, those were not my property. Those were lent to me.
[8] A: And then Gary Mack contacted the people that own those particular prints.
[9] Q: Okay. While those were in your possession—the Mary Moorman photographs, did you make any copies yourself?
[11] Q: We would like you to bring the Mary Moorman copies that you made from the prints to the deposition, as well as any other early-generation copies that you may have.
[12] The next one is Jim Murray.

[2] Q: Do you have any copies of Jim Murray photographs?
[3] A: Oh, the finding of the bullet? Yeah, but I'm not sure which ones are his.
[4] MR. GUNN: Let the record reflect I'm showing Mr. Groden some photographs that appear to be on their Xerox copies of photographs by Jim Murray.
[5] THE WITNESS: I don't have all of these.
[6] I have some. And they're mostly copied from other books. To my knowledge, I have no originals of any of these.

BY MR. GUNN:
[7] Q: Did the HSCA have access, either to the originals or early generations of the Jim Murray photographs?
[8] A: I don't know. I assume that they would have had access to it. Whether they had them or not, I don't know.
[9] Q: Unless you have first-generation negatives
THE WITNESS: I'll check.

BY MR. GUNN:

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

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

Q: But I may have. The House Committee did have some original negatives, but I don't know which was which.

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

A: Okay. The negatives were all turned over to the House Committee. If I have anything, it would be prints.

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

A: Okay.

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

A: Yes.

Q: What do you have?

A: First-generation duplicate slides.

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

A: Probably do. Probably have later-generation copies of the first-generation slides I made.

Q: We would like you to bring to the deposition the earliest-generation Jim Towner photographs that you have.

Q: The next one is number 35, Jack Weaver. Do you have any original or early-generation George Weaver photographs?
A: The Weaver stuff I got was stuff that was
photocopied out of “Six Seconds In Dallas” and
stuff that was made at the National
Archives—copies that you have the originals of.
Q: Other than those two sources that you just
mentioned, did you obtain any copies from any other
sources?
A: No.
Q: You don’t need to bring those, then, with
you.
Do you have any early-generation copies or
originals of the David Weigman film?
A: It says you have movie stills here. In
fact, Weigman is a black and white motion picture
film.
Q: Do you have any originals or early-generation
copies of the Weigman film?
A: I have a early copy of a Weigman film.
Q: Where did you obtain your copy?
A: From a film archive. I think it’s the
First Library in Long Island City in New York.
It’s commercially available.
Q: Other than that commercial archive, did
you obtain the photograph from any other source?
A: The film, actually, appears in
virtually—I’d say, probably 50 percent of the
commercial documentaries that are out there.
Q: We would like you to bring with you the
earliest-generation Weigman film that you have.
Do you have any early-generation or
original Phillip Willis photographs?
A: The original Phil Willis photographs are
all in the possession of his widow, Marilyn.
Q: Did you have —
A: At least, to the best of my knowledge,
they are.
Q: All right. Did you have access to the
original Willis photographs while you worked at the
HSCA?
A: I don’t believe so.
Q: Did you make any copies of any Willis
photographs while you worked at the HSCA?
A: I don’t think so. I bought a set of the
slides from him, but they’re very poor quality.
[1] House press conference that was held in Dallas following the assassination, where Malcolm Kildoff announced the death of the president?
[2] A: At the White House?
[3] Q: It was a White House press conference, but it was at Parkland Memorial Hospital.
[5] Q: Other than from the— Let me withdraw that. Is the copy that you have taken directly from "The Men Who Killed Kennedy" video?
[7] Q: So, you did not go back to the source that "The Men Who Killed Kennedy" used in preparing their video; is that correct?

[1] [Recess.]
[2] BY MR. GUNN:
[5] Q: And that's part of the DCA film; is that correct?
[7] Q: Do you have any Mentesana early-generation or original copies, other than what you would have with the DCA film?
[9] Q: Okay. If we could go back over the list, just to make a quick rundown of those films for which we would like you to make a particular search, in order to bring back originals or early-generation films that you would have. And I'll just go down the list.
[10] I'm going to leave out some that you have already brought with you today. But I don't mean to exclude those to the extent you have other earlier-generation copies of those.
[11] But those that we'd like you particularly to look for now are numbers two, three, and four—all related to the autopsy; the William Allen; James Altgens; Thomas Alyea; Hugh Betzner; Wilma Bond; Malcolm Couch; Jack Daniel; the DCA film; Tom Dillard; Mary Moorman; Patsy Pashell; James Powell; Arthur Rickerby; George Smith; Jim Towner; David Weigman; Phillip Willis; and the tramp photographs to the extent they are not otherwise covered.
[13] MR. GUNN: Now, could we go off the record for a minute.
[14] [Lunch recess.]
Page 102

[1] top of the pile as they come up. They're in no
[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?
[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
[22] Okay. Additionally, where Dillard is

Page 103

[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
[6] Q: Were all three photographs taken from
[7] books?
[8] A: No. These—the two blowups were taken
[9] from the original.
[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 —
[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?

Page 104

[1] A: They're eight-by-ten prints. I'm going to
[2] put my initials on the back of each one. That will
[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
[9] Q: Are these photographs—that have been
[10] marked as autopsy photographs—the originals that
[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

Page 105

generations later.

There are photographs, here, I don't
believe were even used in the book.
Q: Have you ever possessed any other image
from the autopsy, in addition to those that you
have here today?
A: No. I have seen additional ones, but
they're not here. I didn't—I didn't quite get
those. Nobody got those.
Q: Have you seen an image that is not present
in the collection at the National Archives?
A: No. But I have seen images in the
National Archives that are not in the inventory.
Q: Where did you obtain the black and white
photographs?
A: From David Lifton in California.
Q: Where did you obtain the color
photographs?
A: From my work with the House Assassinations
Committee.
Q: How did you obtain them through the House
Assassinations Committee?
A: I went in and made copies for test prints.

Q: Did you make the copies from the originals in the Archives, or did you make them from photographs that had been made of the originals, if you know?

A: They were made from duplicates in the House Committee's collection, not from the originals.

Q: Did you have authorization from anyone to make copies of any of the autopsy photographs?

A: They knew I was making them. In other words, I was making them for the Committee at the same time.

Q: Did you have authorization from anyone at the House Select Committee on Assassinations to keep copies of the photographs for yourself?

A: Not specifically.

Q: Did you have it generally?

A: I don't think that the issue ever specifically came up.

Q: Did you ever tell anyone on the House staff that you were keeping copies of color photographs from the autopsy?

A: I don't believe so.

Q: Okay. The next ones that you have?

A: The next ones are the Moorman photographs.

Q: I notice on the Altgens photographs that there are quite a few light scratches on those.

A: Those are actually processing marks. When I did those, I didn't have a good dryer available to me. And they're, unfortunately, not the best quality prints. But some of those are the only ones that I've got.

Q: Have you reproduced any of the Altgens photographs in any of your books?

A: Yes.

Q: And are these the originals that you use—or the source originals for the copies that end up being published in your books?

A: Yes. I would have made duplicate slides of these to submit to the publisher.

Q: Okay. What is the next one that you have?

A: Hugh Betzner.

Q: And what did you bring from the Betzner photographs?

A: All three. One eight-by-ten print of all three.

Q: Let me take a look at that. So the record is clear, are these the earliest-generation copies that you have of the Betzner films?

A: Yes. These, I believe, are made directly from the original negatives.

Q: Okay.

A: — or what was submitted to the Committee as being the original negatives.

Q: All right. What's the next one?
The next one are the tramp photographs.

Q: How many photographs did you bring?
A: Eight of them. Which is interesting, because I thought there were only seven, but there are eight.

Q: They’re all eight-by-ten positives; is that correct?
A: That’s correct. My mind is blank as to the third photographer. I brought Allen, Smith, and for the life of me, I can’t—

MR. MAYN: Beers.

MS. DENK: Beers.

THE WITNESS: Jack Beers, thanks.

BY MR. GUNN:
Q: What are the next photographs that you have?
A: Now we’re going into slides, transparencies. I’ve already mentioned the Dillard ones. Well, these are not in any particular order. I’ve got the Willis slides here, and there’s 13 I have here. There is a duplicate of Willis 5. One is made from the original I got from him—one is the original I got from him, and the other one is from his commercial set that has the arrow pointing toward the President. So, there’s 13 of those.
Q: And these are the photographs that you purchased directly from Mr. Willis; is that correct?
A: That is correct. At least, I believe that’s correct. I have some that look a lot worse than these. These, I believe to be the best ones I’ve got. His were all very, very pink and faded. These are also pink, but they—these look actually better density than the stuff that I remember.
Q: Are these, in any case, the earliest-generation copies that you have?
A: I believe that they are. The one that your finger is by there, the greener one—there. That one—is actually closer to the original than any of the ones in the commercial set.
Q: This is the one of the Willis collection that is not itself labeled—contains no marks, and it is a picture of the presidential limousine and the backup Queen Mary as it’s descending down Elm Street; is that correct?
A: Yes. I’ll mark that Willis 5, just to be safe.

MR. GUNN: So, the record will reflect that you are now marking the Willis slide and writing the name “Willis” on the slide.
THE WITNESS: Next—Oh, you haven’t asked for it.

BY MR. GUNN:
Q: No, go ahead. The next one, please?
A: Next is the Powell photograph.
Q: Is there more than one photograph?
A: No, there’s only one.
Q: And this, of course, is a slide transparency?
A: That’s correct.
Q: I don’t now recall whether you identified the source of this when we went through this this morning. But the source for the Powell photograph was?
A: The HSCA.

Q: The next one—
A: Which was, in turn, I believe, from the FBI.
Q: The next one you have?
A: Next are all four of the Towner slides.
Q: And those slides are the earliest generation that you have; is that correct?
A: Yes. These are made directly from the camera originals. These are first generation. It’s the original square format reduced to 35 millimeter, so that you have the entire picture area.
Q: Okay. The next ones?
A: The next ones are the Bond slides—Wilma Bond slides.
Q: How many Bond slides are there?
A: There are nine of them.
Q: Are these the earliest-generation copies that you have?
A: Yes. They start with number two. Number one is not part of the set, if there is a number two. It’s never been—it was probably taken.
before the motorcade. So, they're numbered two through ten, but there's nine of them.

Q: Okay. And the next ones you have?

A: That's it for the still images. Next is the motion picture. Paschell, color print, 35 millimeter.

Q: And that's a motion picture?

A: Yes.

Q: Next one?

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

Q: This is the one you obtained from the Long Island City Archives?

A: Yes.

Q: And the Weigman film is the earliest generation copy that you have; is that correct?

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

Next is a 16 millimeter Ektachrome of the Daniel film.

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

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

Q: And the next one?

A: And the next one, which is also the last one, is the Alyea film.

Q: Would you describe that one, please?

A: Sixteen millimeter, black and white print.

Q: Where did you obtain the Alyea film?

A: That, I don't remember. I don't know.

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

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

But the one that's viewable is on my "The Assassination Films" videotape, and that's made directly from my source. Unfortunately, the quality is really, really bad. There are better copies of that available. I've seen it on ABC documentaries all the time.
given away first-generation copies of the stuff that I have to legitimate researchers many times through the years.
Q: My question would be whether you have ever parted with your earliest—your own earliest-generation—
A: Oh, no.
Q: Do you currently have at your home any photos or images related to the assassination that belong to others—people other than yourself?
A: There are some videotapes that I have borrowed from other people that I have not yet returned. But, once again, they're multi-generation.
Q: With the exception of the videotapes, are there any earlier-generation copies than what you have brought here today that you have at your home that, nevertheless, belong to somebody else?
A: No.
Q: Did you speak to anyone after receiving the subpoena about the fact that you had been subpoenaed by the Assassination Records Review Board?
A: Yes. I spoke to a couple of attorneys I knew, to get their feedback on what they thought.
Q: With the exception of the attorneys, did you speak with anyone else?
A: Possibly to some researchers. I'm pretty sure I did. I had spoken to the attorneys; and somehow or other, the attorneys let the word out. Not with my particular desire for them to do so, but several people have asked me about it—people who I have not told.
Q: Did you ask any questions or speak to anyone about the possibility of your, perhaps, having additional films beyond those that were currently in your possession at your home?
A: I think one or more people asked whether I thought that anybody else thought that I might have additional materials that I had never published. Which is not the case. I've published everything I've got. Everything that was relevant to the case, I published in the books or the videotapes.
Q: Do you have any— Could you look at the third paragraph of the subpoena, under documents and photographs. Could you tell me whether you have any documents responsive to the third paragraph?
A: I don't believe I have any. I don't think I have anything in the way of—that even comes close to that. I don't think I do.
Q: While you worked at the HSCA, did you ever take any notes regarding the work that you were doing?
A: I don't think so. I really don't think so. If I did, it's 20 years ago.
Q: Have you ever told anybody that you kept notes from the time that you worked at the House Select Committee on Assassinations?
A: I had written the House Committee memos, and those memos have been published in the Committee volumes. And I do believe I have made copies of those memos, possibly—Xerox copies of the memos that are published in those books.
Q: With the exception of those memos, did you ever tell anyone that you had any other notes related to your work at the HSCA?
A: I don't recall. I don't think so.
Q: In the ordinary course when you are doing photographic work, either making film-to-film copies from originals or making enlargements, do you keep any kind of written record of what it is that you're doing, such as the number of frames that were done, exposures, timing—that sort of thing?
A: Usually not. I mean, I may at the time.
Q: Did you ask any questions or speak to anyone about the possibility of your, perhaps, having additional films beyond those that were currently in your possession at your home?
A: I think one or more people asked whether I thought that anybody else thought that I might have additional materials that I had never published.
Q: If you were to make a copy at a later time, would it be useful to know at what exposure you had made a particular reproduction?
A: If you were going to do it again, it
probably would. But then again, if you're shooting
on a different type of stock, any production
numbers that you would use would be invalid,
because the different emulsions change all the
time. You'd have to run new test prints.
And, normally, when you're doing stuff
like this, what you do is, you shoot the negative,
and the lab does the printing. So, the labs would
use the notes, and then they would throw those away
when they're finished with it.
Q: Have you ever entered into any contract to
either sell copies of films, license copies of
films, or purchase copies of films?
A: I've licensed copies of my footage to some
researchers and film makers, yes.
Q: Approximately, how many contracts have you
entered into regarding photographic imagery from
the Kennedy assassination?
A: I have no idea. If you count contracts
for my books, allowing my footage to be used by
Oliver Stone, one researcher in particular—
David Lifton wanted copies of all my
stuff. He wanted to make videotape copies of all
my stuff. I entered into a contract with him,
which I always regretted, because he never lived up
to his contract.
I'd say probably, at least—at least, a
half a dozen contracts through the years.
Q: Do you keep copies of those contracts?
A: Some. I'm sure I have some.
Q: Do you know, for example, whether you have
a contract with—if you have a copy of the contract
with Oliver Stone?
A: That, I must have.
Q: Do you recall, for example, whether you
have a copy of the contract with David Lifton?
A: The contract with David Lifton was one
that he printed out on his portable computer. And
it was a very sloppy one. I'm sure I have it
somewhere. I haven't seen it in a lot of years,
but I know I have it somewhere.
Q: Do you keep all of your contracts in a
file together, or could they be scattered
throughout your filing system?
A: They could be virtually anywhere.
Q: Could you describe for me, in just a
general way, what New Frontier Productions is?
A: New Frontier Productions is a company that
I created to release videotapes of the
assassination, to make them available to
researchers and people that were interested in the
case.
Q: Is it incorporated?
A: No.
Q: Is it licensed to do business in any of
the states?
A: I don't know what you mean by that.
Q: Is it registered with any state authority?
A: It's registered here in Pennsylvania.
Q: Does New Frontier Productions, as separate
from yourself, own or possess any photographic
images from the assassination of President Kennedy?
A: They would be the same images.
Q: So, if the subpoena, for example, had read
both to Robert Groden and New Frontier Productions,
would you have brought more images, or would they
just be exactly the same?
A: Exactly the same.
Q: What is Groden Films?
A: Groden Films is just the name of my
production company for producing the videotapes.
Q: Is Groden Films incorporated?
A: No.
Q: Does Groden Films possess any
assassination images beyond any that you, yourself,
possess?
A: No.
Q: Are you affiliated with any other company,
in addition to New Frontier Productions and Groden Films?
A: Slides Unlimited and Images Unlimited.
Q: Does either Slides Unlimited or Images Unlimited possess any images related to the
assassination of President Kennedy beyond those
that you possess yourself?
A: No. Neither of them possess anything
relating to the case.
Q: I'd like to start now with a little bit of
Q: Do you recall whether you, in fact, prepared the document that's now marked Exhibit 5?

A: I don't know. I don't remember doing it, but it is accurate.

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

A: I don't remember. It's entirely possible, but I don't remember it.

Q: When was the first time that you did any work, either compensated or not compensated, in the area of photography, or enlargement, or photo processing?


Q: Was that at EFX Unlimited?

A: Yes.

Q: How did you come to obtain a position at EFX Unlimited?

A: The number two man in the company had a best friend, whose girlfriend was involved in the New York state employment service. And I went to apply, to be—to try to find work. At the time, I was out of work. And she was impressed with what she saw, and told me about the job, which hadn't
Q: Is EFX Unlimited the laboratory where Mo Weitzman worked?
A: Yes.

Q: What was your title when you first began at EFX Unlimited?
A: Well, basically, I was a trainee in the optical effects field.

Q: How long did you work there, approximately?
A: I guess, about four years—on and off. I worked there, and then they had a layoff, because there was—business was bad. And then they hired me back again.

Q: Is there a reason that the resume doesn’t have a period more than just the one year for 1969?
A: Not that I’m aware of.

Q: While you were at EFX Unlimited in the 1969 to approximately 1972 range, did you have any contact with any films or projects related to the Kennedy assassination, other than the Zapruder film?
A: While I was actually working there?

Q: Yes.
A: I don’t believe so.

Q: Again, other than the Zapruder film, which I mean neither to include or exclude for the purposes of the substance of your question, was EFX Unlimited performing any other work related to the assassination during the 1969 to ‘72 period?
A: Not that I’m aware of.

Q: With relationship to the Zapruder film, from your prior testimony I understand that the company did work on the Zapruder film in that period; is that correct?
A: No, it was a previous company that had worked on it. I don’t think that they worked on it at that time as EFX Unlimited. I think that EFX Unlimited became an entity after the work was done.

Q: Was the name of that prior company Manhattan Effects?
A: It could well have been.

Q: Do you know the name of the prior company?
A: No.

Q: Do you know who the person was who was responsible for the Zapruder film at the prior company?
A: No.

Q: While you were at EFX Unlimited, did you ever see any negatives, positives, copies of the Zapruder film?
A: The one print that I told you about, during the 1969 to ’72 period?

A: Yes. I would say probably ’69 to ’70, to be more exact.

Q: According to this resume, you were back at EFX Unlimited in 1973; is that correct?
A: Yes. I would say probably ’69 to ’70, to be more exact.

Q: According to this resume, you were back at EFX Unlimited in 1973; is that correct?
A: Yes. I would say probably ’69 to ’70, to be more exact.

Q: Did you perform any work at all related to Kennedy assassination photographs during the time that you were at EFX Unlimited in the 1973 area?
A: As a part of the job?

Q: Yes.
Q: Were you aware of any work going on related to Kennedy assassination materials during the 1973 period?

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

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

A: I don't remember. I don't remember at all.

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

A: Possibly—everything relating to it—between a half a dozen and a dozen.

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

A: Again, I don't remember exactly. I don't remember dates. I know there were some copies that he had given to me, and then taken back—asked from them back. And then they disappeared.

Q: Approximately, when did he ask you to return them?

A: I don't remember.

Q: Approximately, how many did he ask you to return?

A: I don't remember them, either.

Q: Was it all of them?

A: It may have been. He was approached by somebody, as I recall. Again, it's very foggy in my mind. But I think somebody wanted to look at them, or license them, or do something with them. And he had called me, and asked for them back. And I brought them back to him. And some of them disappeared, but I don't remember how many. He had some that he had not given me that also disappeared. Apparently, there was a move—when they moved from one area to another within the same building, some of them apparently disappeared.

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

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Q: Approximately, how many did he ask you to return?

A: I don't remember them, either.

Q: Was it all of them?

A: It may have been. He was approached by somebody, as I recall. Again, it's very foggy in my mind. But I think somebody wanted to look at them, or license them, or do something with them. And he had called me, and asked for them back. And I brought them back to him. And some of them disappeared, but I don't remember how many. He had some that he had not given me that also disappeared. Apparently, there was a move—when they moved from one area to another within the same building, some of them apparently disappeared.

Q: Could you help me straighten that out?

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

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

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

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

And I remember that Mo had said that none of the—none of the early stuff—the negatives from back in the '60s, when it was first done, were still there. He said he had stuff there. Some of the work was still there. Negatives, prints—something was still there. And when he looked for them, they weren't there anymore. And then he borrowed stuff back from me that he had given me. And some of that stuff, I did get back; and some of the stuff, I didn't.

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

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

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

A: I don't believe so.

Q: If he had given you a 35 millimeter negative made from the original Zapruder film,
[1] Would you be likely to remember his having given that to you?

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

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


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


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


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


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

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

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

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

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

[23] A: I'd say somewhere between the two. I know the last time I went to see him is when my book "The Killing of a President" came out. And I brought a copy up to him at work, but he wasn't there. So, I left it for him. And as far as I know, I never spoke to him since.

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


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

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

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

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

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

[31] A: Probably both.

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

[33] A: To?

[34] Q: To anybody.

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

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

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

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

[39] Q: Is that something that, in the course of your relationship with Mo Weitzman, you should have disclosed to him; or is that not particularly
relevant for your relationship?
A: I don't think so.
Q: You don't think that it's not relevant?
A: I don't think so. He had requested that I not mention the source for many years, before I revealed his name in the book.
About a year before that time, I had asked him. I told him that I wanted to be able to give credit where it was due for making the images available for history. And he said, at that time, that he didn't mind if I did.
Q: Do you have any understanding right now as to what images Mo Weitzman possesses related to the Kennedy assassination?
A: I don't know if he has any at this stage.
Q: Are you in contact, as far as you know, with anybody who has an ongoing relationship with Mo Weitzman?
A: No.
Q: Could you look at Exhibit 5, and tell me if—if you have any recollection of whether you may have prepared the resume for the House Select Committee on Assassinations?
A: I really don't remember. '75 to present. It doesn't say when "present" was. It could have been for anybody. I really don't know. I don't remember preparing it. But it is accurate. At least, it seems to be. I don't doubt that I prepared it.
Q: Have you ever visited the firm called Manhattan Effects?
A: No.
Q: Are you acquainted with the firm called Eastern Optical Effects?
A: I believe the Eastern Optical Effects was one of the previous names of the company, prior the EFX Unlimited being formed. And it's possible—it's possible that there is another entity using that name now.
Q: Do you know whether Mo Weitzman worked for a firm called Eastern Optical Effects?
A: I think he did.
Q: Do you know where Mo Weitzman works now?
A: No.
Q: Have you ever heard any information about any Kennedy assassination related material being in the possession of a company called Eastern Optical Effects?
A: If Eastern Optical Effects was the name of the company that did the work initially for Life magazine, then, yes. If not, then, no. It could have been Eastern. It could have been Manhattan, as you mentioned before. I don't know. I wasn't there.
Q: Are you aware of any other New York labs, in addition to those that we have mentioned so far today, that did work related to the photographic record of the Kennedy assassination?
A: One called Huemark. I believe they were the ones who did the Zapruder copies for the Garrison investigation, if I'm not mistaken.
Q: Did you, yourself, ever visit Huemark?
A: I don't think so. They're an eight millimeter print house.
Q: Were you aware of any other labs in New York that did work related to the Kennedy assassination?
A: I don't think so.
Q: Have you ever seen any Kennedy assassination related films at any other labs, beyond those that we've already discussed?
A: Let me back up. When you say "labs", you mean processing laboratories, or optical effects houses, or —
Q: Anything.Any kind of lab that has to do with photography, films.
A: I had a phone call once from a fellow who said he worked at a company called TVC Lab, which used to be on 43rd Street. I don't know if they still are. And he attempted to sell me a copy of my own film, actually. He didn't —
Q: Did you buy it?
A: No. But he didn't know that it was mine.
What happened was, he ran illicit prints off of the optical work that I was doing without the knowledge of his employers.
He had been fired, and he was looking to make some money. He saw me on a television show,
and he attempted to sell my own film back to me.

But I don’t know the guy’s name.

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

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

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

A: I don’t think so.

Q: Have you ever been a plaintiff or a defendant in any lawsuit related to the Kennedy assassination or photographs related to the Kennedy assassination?

A: A plaintiff in a lawsuit?

Q: Plaintiff or defendant.

A: I’ve been a plaintiff in New York against my former coauthor, Harrison Livingstone. He used materials that he got from me without my permission.

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

A: That is still pending. It’s been put off till October.

Q: The trial has been put off till October?

A: Yeah.

Q: Are there any other lawsuits?

A: Well, there’s two separate suits there, for two separate books. One is a libel action—straight libel, not relating to the actual use of materials.

Q: And what is the one that is not a libel suit?

A: Well, there’s libel in both suits. But the first one is for "High Treason 2", and the second one is for "Killing the Truth".

Q: I assume that "Killing the Truth" is a counter suit—or, no, I’m sorry. "Killing the Truth" is a separate suit that you filed against Mr. Livingstone?

Q: Have those two suits been consolidated?

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

Q: Is the second lawsuit scheduled—slated for trial?

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

Q: So, it’s the same judge for both cases?

A: Yes.

Q: Are you a plaintiff or defendant in any other lawsuits?

A: Livingstone made some illicit moves against two of my children—some rather disgusting moves against two of my children. And when I found out he was doing it to other kids, I let the people know that it was not a unique situation; that he had done it before.

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

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

Q: Have you ever been a plaintiff or a defendant in any other lawsuit related to the Kennedy assassination or photographic record of the Kennedy assassination?

A: I don’t think I have. I’m not—it’s possible. I just don’t really think so. I have no memory of it, if I was.

As I explained to you when I came in before, I’ve had seven strokes. And there’s parts of my memory that I just—you know, I’ll go in an area, and just all of a sudden I’ll hit a blank
Assassination Records Review Board
Re: President John F. Kennedy

[Page 150]

Q: Have you ever been engaged in any legal disputes that may not have risen to the level of filing a suit, with respect to issues relating to photographs related to the Kennedy assassination?

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

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

But because of the misprint, they smelled money, and they sued. Settled for $12,000. Again, it was a frivolous lawsuit. It was without any basis in fact. I didn't even write the words, in the first place. But it would have been so expensive to defend the case that the publisher settled.

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

Q: Who was that?

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

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

The other two were Paschell—The Paschell film. Paschell had an agent named Mark Oaks. I had his permission before I ever did it.

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

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

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

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

[Page 151]

MR. GUNN: We'll take a short break.

[Recess.]

MR. GUNN: Okay. Back on the record.

BY MR. GUNN:

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

A: Yep, produced it.

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

A: Yes, that silly photograph is me.

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

Do you recall having said something of this sort, "since the films are unavailable anywhere else"?
Q: Have they all been transferred to digital tape?
A: Yes.
Q: Were are the digital tapes?
A: They are archived in the—in a vault in a professional lab. I don't have those.
Q: Are you the owner of those tapes?
A: Yes.
Q: Were those digital tapes used to produce the film "The Assassination Films"?
A: Yes. Well, all except for a few. There were a few scenes that came from other sources, but the vast majority came from those.
Q: Did you make any of the digital tapes from sources other than those that you brought here today?
A: Yes, the optical effects versions that you told me weren't necessary to bring.
Q: And just so that we're clear here, an example of one of the optical effects would have been a version of the Zapruder film that was Grodenscoped. Would that be right?

Q: But in terms of the original source films, you did not—in terms of the original source films, did you use any digital versions from sources other than those that you brought here today?
A: Again, there's different footages—other versions that I did not bring today. Say, optical rotoscopes of Governor Connally and like that.

Yeah, those are the ones—all those were digitally transferred and are used on the film—on the tape.
Q: Well, I don't mean to suggest anything that was enhanced. I'm not asking questions—
A: Oh, okay.
Q: —about anything that was enhanced, or enlarged, or deblurred, or Grodenscoped. Anything of that sort isn't the question.

But just in terms of the original source films, did you use any original sources, other than those that you brought here today, for the preparation of your video?
A: I don't believe so.
Q: My concern is, when you say you don't believe so, is there a possibility that there is some source that you used other than the films that you brought here today?
A: Again, I don't think so. If I have two or three identical prints of the Hughes film, for instance, I don't know which one I would have used. The one that says "original"—which I brought—is the one that I'm convinced I would have used. It wouldn't have made sense to spend the time and money to use a lesser version. So, I would say that I used the same ones.
Q: Is it possible that a digital version of the films would have a better quality than the source films from which they were taken?
A: Clarity would be identical. Color correction would be considerably better on the digital. You can tell. When you compare those to this videotape, you'll see the difference, because the videotapes were color corrected, where the films have faded tremendously.

One thing to remember, though, is that the...
A: They should be identical. That's the purpose of digital. They should be identical.

Q: Other than color correction on the digital tapes, did you do any other—take any other steps to alter either the sharpness of focus or images?

A: Slow motion, freeze frame, adding circles to highlight specific issues I'm trying to point out. Those things, yes.

Q: But in terms of focusing or sharpness, deblurring—

A: Oh, no.

Q: —you didn't do that?

A: That would be the same.

Q: Okay.

A: It is not possible to legitimately focus something that's out of focus. It can't be done.

You can use a process called image deblurring, but it's—the computer hypothesizes what it wants to see. And I have always stayed clear of that, because then you're altering the photographic image, rather than presenting the evidence. So, I've never dealt with that.

Q: In the videotape, you refer—as I have it written in my notes—to one of the tapes being a pristine copy. What did you mean by "a pristine copy"?

A: Either from a print from the negative or from a reversal copy—an Ektachrome copy.

Q: Just so I'm clear, how many generations were there between the version that was your source material for the videotape and the original camera—Zapruder film?

A: Probably two generations.

Q: And what were the generations? If you can, describe what the source was that you had for your version.

A: Negative and print. But, then, those transfers were done so many years ago, and there's no notes. So, I'm not really clear which copy—which particular copy was used for any particular version. The Secret Service version, I know that came definitely from this particular copy.

Q: This—Again, there are several copies on this roll that I gave you today—the one that's on the reel. I don't know which one of those copies was used, but they're all on there.

Q: Well, the thing that is holding me up is...
just the words, again, "made directly from the original film"—which would imply either that it was made from the camera-original film, or that it was made from a negative that was, in turn, made from the original film.

A: Well—

Q: Would those be wrong inferences for me to draw?

PI A: Yeah, because it wasn't made from a negative image. It was made from a positive image. So, it would have been a print made from a negative made directly from the original film.

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

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

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

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

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

A: Yeah.

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

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

The original film, before the Archives got it, was not cared for. There was mold growing on it. As I recall, there's actually a footprint on a section of the film. It was cut twice, in the 150s and again at 207. There were torn frames. The picture was jumpy.

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

I don't know if you can tell when you listen to the narration on it, I was extremely tired. I was doing this late at night, night after night. And I couldn't—many times, I just couldn't even keep my eyes open.

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

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

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

Is that statement accurate?

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

Q: Did you also have access to a copy negative for the Nix film?

A: Yes.

Q: And how did you get access to the copy negative?

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

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

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

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

Q: Did you return the copy negative to David Lifton?

A: It wasn't a negative. It was a print.

Q: So, you had a print of the copy negative?
A: Right. That was two generations later than the one I gave you today.

MR. GUNN: Let's go off the record.

[Discussion off the record.]

MR. GUNN: We are now going to suspend the deposition until we can work out a time that will be mutually convenient for Mr. Groden and for the Review Board. And we will continue the deposition at a place that will be convenient for Mr. Groden, either in the Philadelphia area or in the Dallas area when he moves there.

Thank you very much. Appreciate it.

THE WITNESS: Thank you.

[Whereupon, at 4:30 p.m., the taking of the deposition concluded.]

[Signature not waived.]

CERTIFICATE OF DEPONENT

I have read the foregoing pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Robert J. Groden

Subscribed and sworn to before me this day of ______.

Notary Public in and for

My commission expires

Robert J. Groden
| Zapruder's 31:18
| Zapruders 33:14
| zoomed 9:20

Miller Reporting Company (202) 546-6666  Min-U-Script®
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 “Reibly”

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”
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
ANSWERS AND DEPOSITION OF ROBERT J. GRODEN, produced as a witness at the instance of the Assassination Records Review Board, taken on the 20th day of, 1996, at 9:12 a.m., before Jill Johnson, a Certified Shorthand Reporter in and for the State of Texas, at the offices of the United States Attorney, Third Floor, 1100 Commerce Street, in the City of Dallas, County of Dallas, State of Texas, pursuant to subpoena.

APPEARANCES

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# INDEX

## PROCEEDINGS

Continued Examination by Mr. Gunn ---------- 172

## EXHIBITS

<table>
<thead>
<tr>
<th>EXHIBIT</th>
<th>DESCRIPTION</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Subpoena</td>
<td>184</td>
</tr>
<tr>
<td>2</td>
<td>6/26/96 letter modifying subpoena</td>
<td>184</td>
</tr>
<tr>
<td>6</td>
<td>8/8/96 letter from Gunn to Groden</td>
<td>173</td>
</tr>
<tr>
<td>7</td>
<td>Nix Release of WTN, signed 4/5/93</td>
<td>255</td>
</tr>
<tr>
<td>8</td>
<td>6/28/91 receipt for materials</td>
<td>255</td>
</tr>
</tbody>
</table>
ROBERT J. GRODEN,
being cautioned and sworn to tell the truth, the
whole truth and nothing but the truth, testified
on his oath as follows:

CONTINUED EXAMINATION

BY MR. GUNN:

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

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

A. Yes.

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

A. No, although I must -- I must state, if
I can, for the record that I received the letter
telling me about this meeting today on Saturday,
which was two days ago. And there is in fact a
paragraph from here I'd like to read into the
record, if I may. And that is, "Based upon our
review of your deposition on the facts that we
have independently gathered, I suggest that you may wish to reconsider your earlier decision not to retain counsel to represent you."

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

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

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

[Exhibit 6 marked.]

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

A. Yes, it is.

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

A. May I add that I only received one phone call and that was on Friday. The call was made Friday. It's still the only one I received and it is on my answering machine still. And it was a notification that it was there at the station. I received that phone call -- the phone call was made at about 11:00 clock in the morning Central Standard Time, about noon Eastern Standard Time. I did not receive that call until after midnight because when I got home I found it on my voice mail. It is the only time I found out that that was there.
Q. The other calls that had been made were to the post office to make sure that you had received this, that you had received notification. So the other calls to which I was referring were to the post office advising them. There was initially an error in the address, as you can see.

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

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

A. Okay.

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

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

A. Well --

Q. It's your choice.

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

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

I would just like to have it in the record that if indeed there is a mistake made in
my testimony because of that, I apologize for it. But I don't believe that that would be the case. If I don't remember exactly, I will just say I don't remember.

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

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

Q. In reading the transcript, did you discover any errors to which you would like to draw my attention?
A. There are a great many. I marked them on -- in the record. Probably, I guess, 30, 40, 50 errors. Nothing really major. The only thing that I found that -- and I remember since that time that is actually an error in the testimony itself is you had asked me if I had ever sold copies of anything, early generation copies to anybody and I had said no. And I had forgotten about it. I had in fact sold a 35 millimeter original print to LFP Productions in California.

Q. A 35 millimeter original print of --
A. Of the Zapruder film.

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

A. From Mo Weitzman. As I recall.

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

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

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

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

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

A. Yes. That is correct.

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

A. I believe so. I do believe that that was the source of the 35 millimeter original transfer that was done digitally back in, oh,
gosh, back in the 1970s.

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

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

A. That is correct.

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

A. That is correct.

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

A. That is correct.

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

A. Actually I believe I used them both.

Q. Did you make a digitalized version of the 35 millimeter film prior to the time that you
sold it to LFP Productions?
   A. I believe I did.
   Q. So then you did retain a copy of the 35 millimeter film; is that correct?
   A. On videotape, yes.
   Q. For the copy of the 35 millimeter that you retained on videotape, where is your earliest generation copy of that 35 millimeter tape?
   A. They are archived right now. All of those materials are archived.
   Q. Where are they archived?
   A. They're archived with Allied Film here in Dallas.
   Q. When were they archived at Allied Film in Dallas?
   A. I don't know.
   Q. Approximately?
   A. I don't really remember. I would say the final time they were used and rearchived would have been, I guess, last -- last September or October perhaps, sometime around that point.
   Prior to that they had been for years archived at -- oh, gosh. What was the name of -- Video Post.
   Q. Where is Video Post?
   A. They are here in Dallas.
Q. Other than Allied Film and Video Post, have you ever archived any materials related to the assassination of President Kennedy in any other commercial storage or archival facility?

A. No.

Q. Have you ever archived any images related to the assassination of President Kennedy other than digitalized videotapes?

A. I'm not sure I understand the question. Have I -- have I ever archived them, except on videotape like that?

Q. Let me withdraw the question and ask it again.

What materials do you have archived in Allied Film?

A. The master tapes for my two videos and the source material, the source transfer videos.

Q. What do you mean by the source transfer videos?

A. When I had the films years and years ago, before they -- they had already started to fade. You know, they're on very, very old print film and the print colors have faded. They become very red. They're virtually indistinguishable now. Virtually every color looks red, no matter
what, even the grass. And the transfers that were made back in the 1970s are the only ones that retained any true color. So what I had done is I had transferred the films to dig- -- to videotape and they were color corrected at the time onto tape. Those are the source materials that are archived at this time at Allied.

Q. Are those videotapes digitalized?
A. Yes.

Q. What --
A. At least I believe -- I believe they’re all digitized. Some may be analog but I think they’re all digital.

Q. Did you ever make a digitized version of any original film related to the assassination of President Kennedy?
A. All of them. I believe all of them. All the ones that were relevant to the -- to my videotapes.

Q. Did you ever make digitized versions of the camera original films?
A. No. No. They were eight millimeter. And the place where I had it done did not have the capability of doing it from eight millimeter. Those were all done from eight millimeter to 16
millimeter in New York City and there was no
digitization at all. That's film to film.
Digitization only refers to tape.

Q. Would it be fair to say then that at
Allied Film you have never stored any materials
other than videotapes?
A. As far as I know. I may -- I may have
stored films there while they were being
transferred. I don't remember that. It's
possible. But to the best of my knowledge, the
only things I ever stored there were the
videotapes.

Q. When you say films may have been stored
there while they were being transferred --
A. Yeah.
Q. -- what do you mean by that?
A. Well, they wouldn't have been stored at
Allied. They would have been at Video Post,
because that's where the transfer work was done.
There was a time when the sixth floor people, the
Sixth Floor Museum in the former Texas School Book
Depository, they licensed copies of my films from
me for the sixth floor, transfers for their own
tapes or laser disks. And we did those transfers,
as I recall, at -- yes, we did, at Video Post.
Now, that took several days. As I recall -- I don't remember, but as I recall, I may have stored the videotapes there while the transfers were -- I mean the films there while the tapes were being made.

Q. Of the films that you may have stored there, did you have any films other than those that you provided to us at the former deposition?

A. There may have been some newsreel footage of the motorcade, black and white copies of the newsreel footage. But nothing in the way of originals or Dealey Plaza footage, that I'm aware of.

Q. Other than newsreels that you just made reference to, did you bring to your July 2nd deposition all of the other films that were used to make your videotapes?

A. As far as I know, yes, with the exception of the DCA film and the Atkins film.

Q. I would like to show you two documents which previously have been marked Exhibits 1 and 2 to this deposition. I'll ask you if those look familiar.

I'll state for the record that Exhibit 1 is a subpoena issued to Mr. Groden and Number 2 is
a letter dated June 26th, 1996 that modifies the terms of the original subpoena.

A. They do appear to be, yes.

Q. And I'd like to ask you whether you brought any additional films or images with you to this deposition today.

A. Yes. The DCA film, which was the only thing that was left over from the other day.

Q. Let's identify this for the record, if you'd like to describe it.

A. This is a 16 millimeter Ectachrome print of the Dallas Cinema Associates film, better known as the DCA film. It is on a 16 millimeter core and has some frames marked with little bits of sticky note things. And that's what that is. And it's in a square, 400-foot can.

Q. Where did you obtain the DCA film?

A. When I was with the House -- I already answered that in the last deposition. But what happened was the House Committee had obtained prints from DCA or people that were related to DCA. I had years earlier found that the original was at Life Magazine and I so informed the Committee. And the Committee went to Life and did obtain the original film. They then gave me the
original film to make duplicates of. I made
duplicates for them; I made a duplicate for
myself.

Q. Okay. I will take this back and put
these with the others in the National Archives
while they are in the process of being reviewed.

A. Okay.

Q. I'll give you a receipt, if you like.

A. Yes.

Q. Okay. We'll take care of that later.

A. How is that process going? Are they
going to be finished with them soon, you think?

Q. I hope soon, yes.

A. Okay.

Q. Now that you've provided the DCA film,
is it your testimony that you have complied fully
and completely with the subpoena as modified in
the June letter in terms of bringing documents
with you to -- documents and images to the
deposition?

A. I believe I have. Based on the review
that we did and the list that we went through
during the last deposition, I believe this is
everything.

Q. Do you have any reason to suspect that
you have any additional materials that would comply with the subpoena as modified?

A. No. May I add to that answer that it is my belief that there should be a 35 millimeter Zapruder copy somewhere. I cannot find it. Many of my materials have turned up missing. There have been researchers in my house, sometimes without my permission and without my presence. It is possible -- I know that some things have disappeared. For instance, an original Jack Ruby business card from the Carousel Club, and other things, photographs, possibly films. I don't know. There should be a 35 millimeter Zapruder copy. I cannot find it. I have recently moved down from New Jersey to here. I'm sorry, from Pennsylvania to here. And I did not come across it at that time. I did look for it. There should be one and I can't find it.

Q. Where did you obtain that 35 millimeter Zapruder copy?

A. That I do not know. Probably from Mo Weitzman. If it's an original source material, it would have come from Mo Weitzman.

Q. Is the 35 millimeter version an internegative or a print?
A. It is my feeling that it is probably a print.

Q. Approximately when did you obtain the 35 millimeter missing version of the Zapruder film?

A. If it's what I think it is, it would have been probably sometime around 1975 or '76, I would think.

Q. Other than that Zapruder film to which you just referred, is there any other early generation material that you had at one point that you now no longer have possession of?

A. There are earlier generation -- there are early generation negatives and prints from the Hughes film and the Bell film. But what I have given you, what I've -- not given you. What I have lent to you are the source materials. As I know it, those are -- those are the closest to the originals.

Q. I'd like to go back to our previous discussion of your film "Conspiracy Volume II, Assassination Films".

A. Yes.

Q. You previously identified the two 16 millimeter films that you produced in the deposition as source films for "Assassination
Films"; is that correct?
   A. Yes, um-hum.
   Q. Is that --
   A. You mean the Zapruder copies?
   Q. The Zapruder copies, yes.
   A. Yes, um-hum.
   Q. And in addition to the 16 millimeter films, today you've identified a 35 millimeter print that was another source for the Zapruder film in "Assassination Films"; is that correct?
   A. I believe so, yes. I believe that that was probably one of the source materials.
   Q. With respect to the Zapruder portion of "Assassination Films", did you have any other source material in addition to the two 16 millimeters and the one 35 millimeter film that you have identified?
   A. When you say source materials, you mean earliest generation -- things that generated-- later generation items. Yeah.
   Q. Yes.
   A. That should have been it. I do believe that was it.
   Q. Did you use any 35 millimeter internegatives to produce in any -- did you
use -- let me withdraw that.

Did you use any 35 millimeter
internegatives in any way for the production of
the film "Assassination Films"?

A. Indirectly, yes. You just reminded me
of it. In 19- -- I believe 1991, Oliver Stone
licensed Zapruder copies from -- from the Zapruder
family, from Jamie Silverberg and the Zapruder
family. They had them shipped to Video Post for
transfer and I supervised those transfers. There
were 35 millimeter negatives and interpositives
there which were never in my possession. They
were not mine. And we did make copies of those.
And those may have been used in the -- in the
production of the videotape "The Assassination
Films". As I -- as I understand it, those
interpositives and internegatives were what were
made for CBS-TV in 1975 or '76.

Q. Did Mr. Silverberg or Mr. Zapruder tell
you how they came to have possession of those
internegatives or interpositives?

A. I don't recall exactly, but my feeling
is -- and again, I've got the memory problem, so
I'm not sure. But I have a vague feeling that
someone had made the mention somewhere along the
line that they were the CBS copies, the blowups
that were made in 1975 or '76. They would be
closer to the originals than mine. Which are the
original, I should say.

Q. But you are now testifying that you may
have used those materials sent by Jamie Silverberg
and Henry Zapruder to Video Post as source
materials for your "Assassination Films"; is that
correct?

A. I may have. I don't know which ones I
used. As I recall -- as I recall, and I'm pretty
sure we do, we did trans -- I know we transferred
those. I know we transferred them. Whether those
were used or not, I don't know.

Q. How would you be able to determine
whether you had used what I will call the
Silverberg internegatives for use in your video
"Assassination Films"?

A. I don't know that I could.

Q. Is there any written record kept by
Video Post?

A. No.

Q. Did you keep any written record?

A. No.

Q. Did you inform either Mr. Silverberg or
Mr. Zapruder that you would be using the internegatives that they had sent for your own videotape?

A. No.

Q. Did you ever request permission to use those for your videotape?

A. Yes, um-hum. Not -- not those specifically but copies of the film.

Q. From whom did you make the request?

A. Jamie Silverberg.

Q. What was his response?

A. He licensed me to do it.

Q. Did he give you the license in writing?

A. Yes.

Q. Do you have a copy of that?

A. I'm sure I do somewhere. I don't know where it is.

Can we go off the record?

[Discussion off the record.]

Q. We have been having a fairly lengthy discussion off the record about Mr. Groden's memories of materials related to the Kennedy assassination. We're now going back on the record to pursue some of those questions.

Let me ask you first, could you please
identify for me all of the films or images that were ever given to you or lent to you by Mo Weitzman?

A. There were copies of Zapruder, Nix, Muchmore, Bell and Hughes. I believe those are the only ones. In fact, I'm sure about Hughes. I'm not a hundred percent sure about Bell. Bell may not have been there, but I'm pretty sure it was.

Q. What was your understanding of how Mr. Weitzman came into possession of the Bell and Hughes films?

A. CBS Television was doing a special in 19- -- or a series of specials in 1975. I believe it was called "The American Assassins". And I was working with them at the time. They wanted to license the Zapruder film and did. And I had suggested that the transfer work should be done at EFX Unlimited because Mo Weitzman had done the work before and was familiar with the process. He could probably do it better than anybody else. So Bernie Bernbaum, the producer at CBS, sent the materials to Mo. I was not part of that. I was not allowed to be part of that. And they also used the, I believe, the Bell and the Hughes
film. I know they certainly used the Hughes film. As I recall, they used both. And as far as I know, all those -- all the work was done at the same time.

Q. Did Mr. Weitzman give you a copy of the Bell and Hughes films?
A. Several copies of the Hughes film. I do believe several copies of Bell as well, both positives and negatives.

Q. Do you remember at your previous deposition you provided us with copies of the Hughes and Bell films?
A. Yes.

Q. Where did you obtain those copies of the Hughes and Bell films?
A. Those were copies given to me by Mr. Weitzman. At least the -- certainly the Hughes film and I do believe the Bell film.

Q. Do you remember what you said about the origin of those films in your first deposition --
A. No.

Q. -- that is, the origin of the films you gave to us?
A. No. I may have said they came from the House Committee, and in fact they may have. I did
the work for the House Committee there too. But
for the House Committee I only went up to 16
millimeter. Now, I may have blown up the 16 to 35
for the Committee, but I don't think I did.

Q. Did Mr. Weitzman blow up from either 16
or eight to 35 for the Bell and the Hughes films?
A. I assume he went from the original eight
to 35.

Q. Did you ever discuss in any way any
internegatives of the Zapruder film with Mr.
Weitzman?

A. As per our conversation off the record,
where you refreshed my memory and triggered some
memories, yes, I did.

Q. What is your understanding -- and your
understanding that your recollections now are
somewhat different from what you expressed in the
first deposition; is that correct?
A. That is correct.

Q. What is your understanding now of any
discussions that you may have had with Mr.
Weitzman concerning internegatives of the Zapruder
film?
A. Some years ago Mr. Weitzman asked to
have back all the materials that he had lent me.
And since he -- or had given me. And I did give them all back to him. I brought them to him. I did not know why.

As it turns out, a filmmaker by the name of Robert Richter had requested to borrow the materials. I later found out that the reason why he requested to borrow those materials is he had entered into an agreement with a researcher by the name of David Lifton and David Lifton had access along with Mr. Richter to those materials, all of the -- all of the Zapruder materials that Mo Weitzman had lent to me or given to me.

We had attempted, Mr. Weitzman and myself, had formally requested materials back from Mr. Richter over a period of, as I recall, something like a year or more. Maybe my memory's not clear on that. Mr. Richtor refused to return phone calls, never returned the items until, as I recall, Mr. Weitzman made a very strong threat. Then some, I do not believe all, of the materials were returned. Mr. Weitzman told me that -- that he had lent materials to Mr. Richtor. I don't know whether he lent him everything or some of it. Mr. Weitzman also stated -- let me -- let me clarify that.
The prints that I had of the Zapruder film had gone very red. They had turned very red. The dyes had faded. The film dyes had faded. And I requested to borrow the original negative back to make an additional print that would be color correct and viewable. And Mr. Weitzman searched for those negatives, or that negative, and could not find any negative material on the Zapruder film.

If I'd have had a 35 millimeter negative of the Zapruder film, I could have printed it myself. I wouldn't have had to go and ask him about it. But I did ask him and he did not have any.

As far as I know, from the first time when he did the film sometime in the 1960s, before I'd ever met him, as far as I know, there was no negative materials at that time at all. But in 1975 or '76 apparently there were. As far as I know, I did not have position of the negative at any time.

Q. But you were aware that Mr. Weitzman had negatives of the Zapruder film.

A. I had assumed that he did because he had -- he had the print from -- from '75.
Q. And did you ever see any negative from the Zapruder film?

A. To the -- well, that's a trick question. I don't think you mean it to be a trick question, but it sort of is.

I did see a negative of the Zapruder film made by Mr. Weitzman and sent to CBS Television. And I saw that negative when we transferred it for Oliver Stone in the -- for the movie "JFK". Also, as I recall, there was an interpositive there as well, or maybe more than one. There may have been more than one negative. There may have been more than one interpositive.

Q. But as far as you recall now, you saw no -- let me withdraw that.

Other than materials that Mr. Weitzman gave to his clients, did you ever discuss any negatives that Mr. Weitzman retained of the Zapruder film?

A. As I said a moment ago, I had asked Mr. Weitzman if I could borrow a 35 negative to make a print or if he could make a print for me from the Zapruder negative. And he searched for one and he searched for quite some period of time and he said he could not find them.
Now, it's my opinion -- and again, when he said he sent materials to Richtor and Lifton (although he didn't know Lifton was involved in it, he just knew about Richtor), if there was a negative, then it went there. I did not see it. If -- at any time after that point. If I had ever seen it at all, it would have been prior to that point and I do not have a memory of that at all.

Q. In other words, you have no memory whatsoever of ever having had in your possession an internegative of the Zapruder film that had been given to you or lent to you by Mr. Weitzman; is that correct?

A. As far as I know, no. I did make copy negatives from the print later on. But that would have been a later generation, not an earlier one.

Q. I'm not interested in the copied négatives. I'm interested in internegatives.

A. The negatives that I had -- any negative that I had or have is a later generation than that original print.

The very best generation negatives -- and this is just -- I'm adding this. The very best generation negative made from the original that would exist now would be the ones that were
made for CBS TV. And they, as far as I know, are in the hands of the Zapruder family because they’re the ones -- those are the negatives and interpositives that were sent to -- to Oliver Stone and those would have been made directly off the original. Any other original negative would be in the hands of Life Magazine.

Q. Has Jamie Silverberg or Henry Zapruder directly or indirectly requested from you access to any Zapruder film materials that you have possession, custody or control of?

A. They did some years ago request a copy of some -- of one print early on. They wanted to be able to differentiate the copy that I had from the copy that they had. So they had me make a copy of one of the prints that I had so they could tell the difference between the two, specific scratches or marks or things of that nature.

Q. Have you ever been told -- let me withdraw that.

Have you ever been solicited by either Mr. Zapruder or by Mr. Silverberg to provide an image of the Zapruder film that you possessed to some other person on behalf of Mr. Zapruder and Mr. Silverberg?
A. I think I hit one of those holes in my memory. It is my opinion that, as I remember, there was -- there was an author who wanted to use single frames in a book and he licensed them from Zapruder, from the Zapruder family. And Mr. Silverberg had me make copies of those individual frames. This is many years ago.

But as far as providing -- as far as providing an actual running film, I don't believe so.

Q. With respect to individual frames, what is your -- what was your source material for the individual frames that you provided to that author?

A. It was from a series of slides. I had made a series of -- I believe -- again, now, see, what's happening is my mind is trying to answer. I want to answer your question and I'm answering you from what I remember, but I could be wrong about this.

As I recall, it was from individual slides that I had made. I had made sets of slides through the years from -- from the original print. And when this fellow -- I can't even remember who it was -- had wanted to license
individual frames, I believe I made duplicate slides of my slide set for him.

Q.: When you say from the original print, which version are you speaking of?
A.: Probably -- I would say probably the first print I got from Mo Weitzman, the one back in 1969 or so.

Q.: And was that print a positive?
A.: Yes, um-hum.

Q.: And that print, was it a 35 millimeter --
A.: Yes.

Q.: -- version?
A.: Yes.

Q.: And is it your testimony that you took individual slides of that 35 millimeter film?
A.: Yes. I made -- as I recall, I made a -- I made a blowup negative. Actually, I probably did it both ways. I probably did direct duplicate slides. But I know I did a blowup negative of individual frames because 35 millimeter motion picture film is half frame. It's single frame. What we see in the way of a 35 millimeter camera negative is a double frame, eight sprocket holes wide instead of just four. So it's twice the
size. If you were to reprint a film frame at its normal size, it would be called half frame.

So what I did is I, with a bellows and a lens and a camera, I actually photographed each frame and doubled its size to full frame, 35 millimeter. And that was -- that's what I used as the source material, as I recall, for those.

Q. And you did that directly, not through a copy negative? Is that correct?

A. No. I made -- I was making a copy negative.

Q. With the slide?

A. With -- yeah. I mean --

Q. 35 millimeter camera.

A. Right. I made full frame and then printed the whole roll of the duplicates and made print slides rather than reversal slides.

Q. Where are the copy negatives that you made from that process?

A. That I don't know. Probably in my former home in Pennsylvania. I'm sure it can be located.

Q. Which are, in your opinion, earlier generation images, the copy negatives that you made from Mo Weitzman's print or the 16 millimeter
film that you brought to the first day of your deposition?

   A. I would say probably the 16 millimeter film. Well, actually the 16 millimeter film and the negative would be the same generation, would be the same generation. But to do a positive print from that negative, it would be an additional generation. So what I brought would have been better, would have been, as a positive image, one generation closer.

   Q. But as an image, though it was a negative, it would be the same generation?

   A. That's correct.

   Q. By my understanding of the terms of the subpoena as modified, those internegative -- or those copy negatives should have been produced at the deposition and I'm now going to ask you to make those available for us.

   A. Okay. I'll have to find it. I'm not sure where that is. I'll have to look for it. But I have an idea where it is.

   Q. Have you ever had the 35 millimeter copy negative stills in any commercial storage?

   A. No. They've always been in my house.

   Q. As a person knowledgeable in
photographic work, would you be able to identify
the difference between a print taken from one
internegative of the Zapruder film versus a print
taken from a separate internegative of the
Zapruder film?

A. That I don't know. It depends if
there's a specific marking. For instance, if one
of them had a scratch or a piece of dust embedded
in the negative, something of that nature where
you identify it one from the other, you probably
could.

Q. In addition to the marks or the
scratches, what else would you look for to
identify differences in prints taken from two
different copy negatives -- excuse me -- from
two internegatives?

A. Well, if there's any kind of a
difference in -- yeah. On the leader, if it's
described differently or if there's any labeling.

Q. What about any emulsion that may have
been left from the wet gate process?

A. I don't think you used the right
terminology there, but -- would you repeat the
question?

Q. Could you explain what wet gate process
is?

A. There is a -- it's -- wet gate or liquid gate process is a system where -- well, let me go back. When light strikes film, it tends to diffuse, go in different areas, doesn't stay linear. Using a low oxygen liquid to temporarily -- it evaporates very quickly. That coats the film as it goes through the film gate. That surrounding barrier around the film causes the light to become linear again, to travel in a straight line rather than to diffuse. And then after the film goes through the gate, it evaporates very, very quickly. That's -- that's what liquid gating is.

Q. Now, if the liquid gating or wet gating is not applied perfectly or if there is a smudge, would it not be the case that an image produced from that process may have a blob or a smear on it?

A. Well, specifically what you're talking about is about the Zapruder film, I assume. The Zapruder film was treated or coated with a waxy substance that does not allow the liquid to remain flat along the film and it tends to -- to bunch up or bead up, as you said. And theoretically, each
particular pass could and probably would, although
not definitely, bead up slightly differently, or
perhaps with a major difference. If the negative
and the print made from that negative are laid
side by side, you could identify one to the other
by checking that pattern, yes, you could. Then
you would -- if you had a separate negative and
you compared the print to that, you could tell
which of the two it came from by that, assuming
that the patterns were not identical.

Q. And so would this process of comparing
possible patterns of residue or emulsion be a way
of identifying two different -- or excuse me --
two prints taken from different internegatives?

A. It should be. It should theoretically
be as unique as fingerprints.

Q. Now, if you wanted to determine which 35
millimeter source you used for your videotape
"Assassination Films", would you be able to
examine the "Assassination Films" and identify the
internegative from which the film had been taken?

A. If I had the internegative, yes, you
could. If I can find the internegative, or if it
could be found, and find a specific frame where
there's a unique pattern, yes, you could be -- it
could be established that way.

Q. So it would be possible --

A. Assuming that it was liquid gated. If it would have been dry gated, just through a regular standard shuttle, then that would not be the case.

Q. But there would also be, as you mentioned, scratches or other kinds of marks that might be on the film that would be other ways of identifying possibly the internegative from which the print was taken?

A. If the scratch itself were on the negative, yes. If the scratch had been on the original, no. Then it would appear on any duplicate made after the scratch was there.

Q. So then, for example, if we were to go to the Oliver Stone version of the Zapruder film and compare that to the version that appears in your "Assassination Films", it would be conceivably possible to identify whether they were from the same source.

A. That's correct. But as I said, there were several negatives and -- I believe there were several negatives. I know there was at least one internegative and at least one interpositive. As
I recall, there was more than one of each.

In other words, the original film is -- it's only -- it's only 486 frames, 21 feet of eight millimeter. I'd have to calculate how long it would be. But it would easily fit into a 100-foot can, a 100-foot film can, a print or a negative of the original.

These were much, as I recall, were much larger rolls. As I recall, there were several takes on each one. And there may have been more than two rolls. I honestly don't remember. But there were -- there were a lot of materials there. And so I could have used any one of those, assuming that we had transferred everything. So I don't know. I just don't know.

Q. In thinking about these issues now, does it help refresh your recollection as to what sources you used for your videotape "Assassination Films II"?

A. No. Whatever -- as I was doing the editing of the tape, whatever at that time would have appeared to be the best copy is what I would have used. There is one that I know looked better than the others. It's the one that I had referred to as a pristine copy, as I recall. If any of
them were from that negative, it would have been probably that. I would think that that would have been the one. But again, I didn't have possession of the negative. I just had access to it that one time.

Q. As you're sitting here today, is it your best recollection that for your videotape "Assassination Films" you used an internegative that was created for CBS in approximately 1975?

A. It would be my best guess that probably was the case. '75 or '76. I don't really remember the year that it was. It was probably toward the end of 1975.

Q. And it's further your understanding that that internegative was created by Mo Weitzman; is that correct?

A. That is my feeling. I'm pretty sure that that's the case.

Q. Do you recall having had any discussions with Mo Weitzman wherein he stated that or suggested that the internegatives that he produced in the 1960s were of superior quality to the internegatives that were produced in the 1970s?

A. I don't believe so. I would think that the opposite would be the case because the film
emulsions had gotten better. The degree of -- the
degree of sophistication of the negatives and the
print materials had gotten better. The print
grains had gotten finer. I would think that that
would be the case. But I don't know. If we did
have such a conversation, I certainly don't
remember it.

Q. Wouldn't it have also been the case that
the quality of the camera original Zapruder film
would have deteriorated between 1967 and 1975?

A. That is true. In 1975 I know from the
dry gate tests that I saw, there was a -- what
appeared to be mold growing on the film, a really
severe mold situation. The film had not been
cared for properly and it appeared very, very
dirty at the time. And as I recall, when I saw
the prints in '75 and I saw that the -- that the
liquid gating was beading up on the -- on the
prints, you could see on the prints that it beaded
up on the original when the negative was being
made, I had suggested that, you know, perhaps they
should have done a dry gate. And they showed me
the tests from the dry gate and the film was in
terrible, terrible shape. So in -- as I recall
from the 1960s print -- do you have a specific
date for that? For the '60s print?

Q. '67 is the year that I understand --
A. '67.

Q. -- that it was done for Time Life.
That's my understanding.
A. Okay. Well, let's refer to it then as
the '67 negative. The '67 negative would have
been made, I assume, before that damage had
happened. And as I recall, I don't think it would
have been treated yet because I don't recall the
beading up of the liquid gate problem.

When -- by the way, as an aside, when I
was with the House Committee I had suggested to
them that they have a liquid gate mechanism, a
full immersion gate created, so that the Zapruder
film could be liquid gated without that beading.
The beading would not -- would not occur with an
immersion gate, with a full immersion gate. But
they did not want to spend the money to do that.
That's just a comment on the side.

Q. Now, thinking back, with the idea in
mind that there had been a deterioration in the
quality of the Zapruder film, does that help
refresh your recollection about any discussions
that you had with Mo Weitzman regarding the
relative quality of 1967 internegatives versus those of 1975?

A. I have no memory of it. It doesn’t mean it didn’t happen. It’s just I don’t remember a specific conversation.

Q. Is it your understanding that the prints that you were given, however, by Mo Weitzman, that is, the 35 millimeter print, was taken from the 19- -- from a 1967 internegative?

A. It would have to be because it’s before the ’75 stuff was done.

Q. We have now identified both a 16 millimeter Zapruder film as well as 35 millimeter copy negative slides that are the same generation of the Zapruder film that you have had possession of; is that correct?

A. Yes.

Q. Are there any other films that you can now identify to which you have had possession that are of the same or earlier generation to those that we’ve identified?

A. Would you repeat that phrasing? I’m not sure.

Q. We’ve identified previously a 16 millimeter Zapruder film and a 35 millimeter slide
copy negative of the Zapruder film that are the same generation --

A. Right.

Q. -- is that correct?

A. Um-hum [nods head up and down].

Q. In addition to those two films that you have had possession of, are there any other versions of the Zapruder film that are of the same or an earlier generation to which you have also had possession?

A. There are the original -- I have a feeling that that's a trick question and I don't think you mean it to be. I have -- I'm trying to -- I'm trying to fathom the way you're phrasing this.

The materials that they were made from would be, of course, an earlier generation. Individual slide frames that I would have made from the print, individual frames rather than the film itself, would be of the same generation as well. In other words --

Q. And did you -- you had possession of those?

A. I did. Unfortunately, 95 percent of those were destroyed in a flood in my basement a
couple of years ago. They were in a box on a
shelf and a water pipe burst right -- right above
it.

Q. What else was destroyed in that flood
from a couple of years ago?

A. Probably about five or six hundred
books, suitcases, family -- family mementos,
cards, report cards, stuff, artwork from when I
was a kid.

Q. Other than family and personal matters,
what other films related to the assassination of
President Kennedy were, if any, were destroyed in
that flood?

A. No films. Just the slides. The slides
were separate. Lots of Kennedy assassination
books were destroyed.

Q. How many times have you personally had
access to the camera original Zapruder film?

A. To the best of my knowledge, just once.
And that was in Life Magazine's offices sometime
around nineteen seventy- -- I guess '76 or so.

Q. Was the time that you had access to Life
after the time of the CBS internegatives being
made?

A. I believe it was before then but I'm not
The circumstances for that was the same. Robert Richtor, that I just spoke to you about before --

Q. Um-hum.

A. -- with his partner at the time, a fellow by the name of McBride, they wanted to do a documentary on the Kennedy assassination in conjunction with an organization that existed then called The Committee To Investigate Assassinations. And they had offered Life Magazine $10,000 for one time use of the film. And they wanted me to be involved in the process. So when they went up there to do negotiations, they brought me along too. And they requested to inspect the original. And a representative of Life Magazine brought the original film down and put it on a light -- a light box. And that's when I inspected it. It was the only time I've ever held the original in my hand.

Q. Can you describe the condition -- you've made previous reference to it, but can you describe the condition of the original Zapruder film at that time, as best you can?

A. Like I say, appalling. There were two splices in the film. Ripped -- ripped
perforations, as I remember. I have a -- I have a strong recollection that there was a footprint on it somewhere in among the frames. I can't -- I have a very strong feeling it was there. I couldn't tell you where, but I have that image in my mind. And as I recall, I noticed at that time that there was mold growing on the film.

Q. What kind of footprint was it? Was it a shoe or --

A. Shoe.

Q. -- bare foot?

A. A shoe type print, as I recall.

Q. How were the colors on the film?

A. Incredibly clear, vibrant. They had not shifted at all.

Q. There were no reds disproportionately then in the original?

A. No. No, not at all. I may add to that the original film was Kodachrome. Kodachrome dyes are much more stable than the dyes used in print film.

Q. Were they Kodachrome or Ectachrome?

A. Kodachrome. As I recall, Kodachrome II, but it might have been just original Kodachrome.

Q. Other than the time that you inspected
the original Zapruder film at Life Magazine, did you ever see the original film again?

   A. To the best of my knowledge, no, I don't believe I ever did.

   Q. How many times did you inspect what you understood to be first generation copies, presumably negatives, of the Zapruder film?

   A. What do you mean by "inspect"? I mean --

   Q. Have your physical possession.

   A. It is entirely possible -- now, you've -- we've -- we've discussed what -- what Mo said before.

   If at any time then I had in my hands, knowingly or unknowingly, a first generation material from that, then it would be very difficult to answer that correctly. I would say that certainly the -- if indeed the materials that Oliver Stone had were the first generation negatives that were made from that film, then that might have been the only time.

   And once again, I've been working -- I've been working with the Zapruder film, one way or another, now since 1969. So it's impossible to give an accurate recollection of anything like that. I'm just telling you now what I remember.
now as you ask me that question.

Q. Sure. You have previously stated before that your understanding was that the internegatives that were used by Oliver Stone came from 1975 or '76.

A. I believe that's -- I believe that's the case, yes.

Q. What is the basis for your understanding that those inter- -- that internegative or internegatives were created in 1975, '76 rather than from 1967?

A. You basically have provided me with that, with a clue of that. You've -- when you mentioned about the liquid gating beading up on it. As I recall, as we watched those negatives, I have a -- I have a very strong recollection now that I noticed that the liquid gating problems were on it, were on that negative.

Q. And it's your understanding that in 1967 it was dry gated?

A. No. I think it was -- I think it was wet gated both times.

Q. And so --

A. Well, what question are you -- I'm not sure --
Q. The question is what is the basis of your understanding that the internegative that you worked on in relationship to the Oliver Stone film was created in 1975 or '76 --

A. Okay.

Q. -- rather than in 1967?

A. And what I had said was that the -- there may have been a CBS identification on it. I don't know. But as I recall, the liquid gating beading up from the film having been treated initially, I believe that was very apparent at the time. So I think that's why I assumed it was then.

Q. But why would the beading up imply a 1975 version rather than a 1967 version?

A. Because it didn't bead up on the '67 version. The '67 version was, as I recall, or as I believe, before the film was treated.

Q. On what basis do you have the understanding that there was no beading up on the '67 internegative?

A. Because the print that I had from the one that was given to me by Mo Weitzman did not have any beading up on it. At least I don't believe it did. If it did, it was far less than
what we see here.

Q. Wouldn't that suggest from what you've just said that the 1967 version that did not have beading up on it would have been a higher quality than the 1975 version?

A. There is -- I guess we were involved with the difference of the term "higher quality". The technical quality would have been better, I think, I believe, on the later one because of the film emulsion. They had improved the film emulsion through the years.

As far as being a cleaner image than the earlier one, the '67 one would have been better. But again, it would have been on an older emulsion that, you know, if you believe Eastman Kodak, they constantly change their emulsions to improve them, better grain, better contrast control, things of that nature.

And although I certainly can't swear to it, as I recall, and again it's a subjective impression, there was less contrast in the later prints rather than the earlier ones. In other words, what was shown on CBS, what was done for CBS would have had more details in the darker areas or the D max -- what's technically called
the D max areas. It's my impression that that's the case.

Q. If Mo Weitzman were to opine that the 1967 internegative or internegatives were of higher quality than anything he was able to make in 1975, would you have any basis for disagreeing with that conclusion?

A. Absolutely none. If Mo Weitzman says that, then I would take that to the bank.

Certainly, the film was in better shape then. It was cleaner. There wasn't mold on it. If I'm correct and the film hadn't been treated yet, you wouldn't have the problem of the liquid gate beading up on the original. There would be many reasons to assume that a -- that a '67 print would be better than the '75.

But again, from a purely technical standpoint, as far as the film emulsion goes, all things being equal, it should have been better in '75. From what I recall from -- from the prints that I've seen from both of them, certainly the '67 would have been cleaner, much cleaner.

[Recess.]

Q. Mr. Groden, I'd like to switch to discuss some other issues now and leave the
Zapruder film behind, at least for the time being.

Is it true that you claim to have seen images in the National Archives from the autopsy of President Kennedy that are not contained on the inventories?

A. Yes.

Q. Which images did you see that are not on the inventories?

A. There is a roll of 120 Ectachrome film. 120 is the size. 120 Ectachrome film with, as I recall, four or five exposures on it. The brightest of the exposures is too dark and they get progressively worse.

They show the president, as I recall, from his left side and show him from above his head to, as I recall, and we're going back to 1978 now, to about midthigh or knee, that area. He is lying on his back and the head -- the face is toward the ceiling. It was -- seems to have been taken either with a wide angle lens or from some -- from some distance away. They are color transparencies.

I wrote a report about this to the House Committee and requested that they take the better --
the best or the brighter of these frames and
enhance them. In other words, do duplicates of
them in lighter exposures. To the best of my
knowledge, that was never done.

Q. Other than the images that were on the
roll of 120 film, are there any other images that
you have ever seen that are not contained in any
of the Archives' inventories?

A. I cannot honestly say that I am familiar
verbatim with the autopsy inventories. I know
that some things that were originally in the
original inventory are not there, specifically the
open chest photographs. It is my opinion that, of
what the Clark panel saw, or what I assume the
Clark panel saw, what was shown to me in the House
Committee volumes, I saw nothing else, as far as
photographs go, relating to the autopsy in the
National Archives that is not in an inventory
except what I just described as the 120.

Q. Did you make any kind of copy of those
five images that were on the 120 film?

A. No. The copies that were made in the
experiment to prove the soft edge mat insert
process were only from later generation duplicates
and were not from the originals and were not done...
in the National Archives. Those images that you just asked me about only appear in the Archives. As far as I know, the House Committee, as an entity, did not have copies of those pictures.

Q. Did you see any information on those five images that you believe would help illuminate the circumstances surrounding the autopsy?

A. I only viewed them hand-held and through a loupe, an optical loupe. It was my suggestion to the Committee that they do lighten them up and blow them up so that they could be studied. My feeling is that any photographs showing the president's body would add to the record. I was not granted access in the sort of situation whereby I could study them.

Again, the images are very dark. It is very clear to me that when the pictures were taken, they were taken without a flash. Or if they were just under available light, because they're so dark. And whoever did it bracketed them, starting with the brightest exposure and then going darker and darker and darker. That's why, as it fades to darker, I'm not sure how many images were there. Originally I thought there were only maybe two or three, but as I looked at
them more, I could see that there seemed to be exposures that were just so faint and so dark that you could hardly see them. So I don’t know how many there were. For all I know, it could be the whole roll.

Q. When you say 120 film, your assumption then would be, I assume, that that was a medium format camera?

A. Yes. And by the way, as I recall, the film was not cut. The individual frames were not cut. It was a continuous roll and rolled up into a cylinder type shape.

Q. Do you remember from the first day of your deposition when you said that you received some black and white autopsy photos from David Lifton?

A. Yes, um-hum.

Q. Was that in approximately the late 1980s that you received them from David Lifton?

A. Yes. It would have been probably 1987 or 1988.

Q. Did you ever show any black and white autopsy photos to anyone prior to the time that you received photographs from David Lifton?

A. I may have shown black and white copies
of the color pictures that I had, but I don’t know that to be a fact. It is entirely possible that I did.

Q. Did you obtain any black and white autopsy photos from the time that you worked at the HSCA?

A. Absolutely not. None.

Q. Did you ever obtain any black and white autopsy photos other than from those that were provided to you by David Lifton?

A. Yes. By Mark — from Mark Crouch. That was after the Lifton pictures. I do not believe David Lifton sent me the entire inventory that he had. He may have or he may have just sent me maybe two of them or maybe three.

Q. What were the circumstances under which you obtained black and white autopsy photographs from Mark Crouch?

A. Mark had wanted to meet me for some time and David Lifton had refused to give him my phone number and address, even though we lived just a few miles apart. And when we finally did meet, we became friends. And he told me then what David Lifton had never told me, that Mark was in fact the source for Lifton’s pictures, that Mark had
gotten them from a Secret Service agent.

Q. Did Mark Crouch tell you approximately when he got them from the Secret Service agent?

A. I'm sure he did, but I really don't remember. I'm sure -- I know -- I know he did. I know he's written memos. He's written about it. I just don't remember when that was.

Q. Was it your understanding that that Secret Service agent was James Fox?

A. Yes.

Q. Would it -- would it make sense for us to refer to those photographs as the Fox set?

A. Sure.

Q. That's an understandable way?

A. Sure.

Q. Other than photos that come from the Fox set, did you ever come into possession of any other black and white autopsy photographs?

A. No. To the best of my knowledge, no. If I did, I assume it was from the Fox set. Other than that, no, absolutely not.

Q. Are the photographs that you published in your videotapes and books from the autopsy, were all of those black and white photographs from
the Fox set?

A. The black and white ones were from the Fox set. The color ones were from my own.

Q. Are you certain that prior to the time that you received black and white photos from David Lifton of the autopsy, that you did not show any black and white autopsy photos to any assassination researchers?

A. As I said, if I did show them, they would have been black and white prints of the color pictures that I already had, that I mentioned to you. Or they could have been black and white copies from David Lifton's book which he, as I recall, he had already published, "From the Best Evidence".

Q. Are you familiar with the photograph that is a left profile view of President Kennedy lying supine?

A. Just from about midthroat to the top of the head?

Q. Yes.

A. Yes, uh-huh.

Q. Are you aware of any image that shows President Kennedy from the exact same angle but from the right profile?
A. No. I'm familiar on the right side from one taken lower and one higher, but not identical, no.

Q. Have you ever heard any discussion about whether there is a photograph that was taken from the same -- at the same angle as the left profile of the right profile?

A. Not that I'm aware of.

Q. Have you ever heard anyone discuss the possibility of such a photograph?

A. Not that I'm aware of. I can't recall any mention of it in any of the literature and I don't think anyone's ever mentioned it to me.

Q. Do you recall ever having seen any autopsy photographs with probes inserted in the body?

A. None. Absolutely none.

Q. Have you ever heard any discussion about the possible existence of such photographs?

A. Not that I'm aware of. Let me clarify that. I interviewed Floyd Reiby, a photographer who lives in Oklahoma, who took 35 millimeter photographs at the time of the autopsy. No 35 millimeter photographs have ever been turned up into evidence.
If Mr. Reiby had mentioned to me that there was something with a probe or something of that nature, I don't remember it. But I don't remember my conver- -- I spoke with him for several hours, and I don't remember. I did not take notes, and I don't specifically remember. If he had mentioned something that like me, I probably would have remembered. I'm very, very curious and would like very much to know what happened to all those 35 millimeter pictures that he took because not a single one has ever appeared anywhere.

Q. While you were working for the HSCA, did you have access to color transparencies of the autopsy?
A. I was able to view them, yes, in the National Archives.

Q. What were the circumstances under which you viewed the color transparencies at the Archives?
A. I had requested to see the originals because of the impressions I got from seeing the duplicates. The duplicates, to my eye, showed me evidence or indications of forgery and I requested to see the originals to see if such indications
appeared on them as well.

Q. Did you find any evidence of forgery on the color transparencies?
A. That which I felt then and still feel now was evidence of a soft edge mat insertion on the duplicates was less apparent or virtually unapparent on the originals.

Q. Did you reach any conclusions as to whether the color transparencies were in fact originals, camera originals from the night of the autopsy or whether they could be forgeries?
A. The feeling I got when I saw them -- and this was not based so much on quality or anything of that nature but based specifically on the testimony of the doctors made at that time. It was my opinion that the photographs specifically of the rear of the head were forgeries, that the other ones I could -- I had no reason to believe that they had been faked. But the ones showing the rear of the head, based on the testimony of everyone who had ever said anything about it, I concluded that they were forgeries.

Q. Did you base your conclusions on anything other than the testimony of the doctors?
A. Well, yes. And that is that in the
duplicates that the House Committee had, which were of a much -- I assume a much later generation, at least two generations, four generations later, that you could see what appeared to be a contrast line buildup, which would occur during a situation where a soft edge mat would be used. The later the generation, the more a mat would appear. Based on what I saw there, which is my original feeling that they were faked. That and what the doctors said made me conclude that, as convincing as what purports to be the originals in the Archives are, that they had to be forgeries.

Q. Were you able to discover any evidence from the trans- -- the color transparencies themselves of forgery?

A. No. Well, there was one thing that made me think that they were. Looking at them side by side in stereoscopic views, to my eye anyway, as you would see with a view master, there -- since the two -- the camera was hand-held. And since two of them side by side were from slightly different angles about the same distance as the human eye from each other, when you view them in stereoscopic pairs, you should see a perfect three
dimensional image. To my eye, I did not. I saw the three dimensional image until you got to the suspicious area in the back of the head and it seemed to go totally flat. That to me seemed to be evidence of forgery. That should not be.

Q. Did you have an apparatus there for looking at them in stereo?

A. I used optical loupes, a pair of optical loupes, as I recall.

Q. What is the basis for your understanding that the camera was hand-held?

A. That's what I was told. I was told it was hand-held. And the fact that they bracketed exposures, that is, light, medium and dark, for almost all the pictures. And the -- it was a four by five camera, where you put in a slide with -- a film holder with a slide and then you take the picture and you turn the slide around and take the second. You put the holder -- can I do this over? You put the film holder in backwards, remove the second slide and do the second exposure, take out the film holder, put in another film holder.

Had it been on a tripod or steadier still, the area should be the same in every
picture. That is, if it’s -- if it’s being held
by tripod and it’s aimed at a specific area, the
borders, the information in the borders of each
picture, if they’re legitimate pictures, should
remain identical in every one, give or take a
millimeter or two for camera movement or
whatever.

But here the angles are so different, so
vastly different between them that I can only
assume that what I had heard, that it was a
hand-held camera, was true. And I believe Floyd
Reiby told me that the photographer who was taking
the four by fives did hand-hold the camera.

Q. Did you ever tell anyone that you had
taken from the Archives any of the Archives’ own
images of the assassin -- of the autopsy?

A. No. Never. The one time that Archives
copies were taken out, they were taken out by an
FBI agent, handcuffed to his wrist in an attache
case and taken to a lab in Maryland where we ran
tests on the pictures. And I didn’t do that. The
lab people did. And that was the lab, I believe,
called Bara (B-A-R-A) and Bara had a contract with
the HSCA. That’s the only time, to my knowledge,
that any original materials left the Archives.
Q. Okay. I'd like to turn to the Nix film.

A. Okay.

Q. Do you recall in your -- the first day of your deposition when you said that you had access to the original Nix film from Orville Nix himself?

A. No, I didn't say that.

Q. Could you turn to Page 45 of the deposition? Can you look at the portion between Lines 7 and 13?

A. Nix is Number 3. That's a 35 millimeter color print of a Nix film. It says it came to me by Orville Nix.

That can't be right. I didn't say that. I did not -- I did not say that. If I did say that, it was -- it was some kind of a confused thing. It did not come to me that way. The Orville Nix film came from UPI for use in the film "Executive Action".

Q. Was that the original Orville Nix film that came from UPI?

A. Yes, um-hum. I assume it was, based on its clarity. I did not hand-hold that. I did not see that. I have never held the Nix original in
my hand in my life.

Q. Now, looking back at your testimony on Page 45 of the transcript --

A. Um-hum.

Q. -- would it be fair to say that you -- your present testimony is that you did not receive access to the original Nix film from Orville Nix?

A. That is absolutely correct.

Q. Do you recall that at your -- the first day of your deposition you provided us with a 35 millimeter copy of the Nix film?

A. Yes, I did.

Q. Where did you obtain that 35 millimeter copy of the Nix film?

A. From Mo Weitzman.

Q. Could you explain to me where the -- let me withdraw that.

Just a moment ago you referred to the film coming through UPI for the film "Executive Action"?

A. That's correct.

Q. What is the relationship between the film "Executive Action" and UPI and the version that you had given by Mo Weitzman?

A. UPI and EFX Unlimited, Mo Weitzman's
company, were in the same building in New York City. When the producers, I believe, Wakeford Arloff Productions -- and I can't spell that -- were going to do the film, they wanted to license some of the actual footage of the motorcade in the plaza. And they did indeed license it from -- from UPI. And since UPI and EFX Unlimited were in the same building and just a few floors apart, and since one of the consultants to Wakeford Arloff was Lifton, and Lifton in those days I made the mistake of trusting, I had suggested to him that Mo Weitzman might be the perfect person to do the work. And, in fact, he was. Now, the only -- the only finders fee that I got for doing that and setting all that up was that both David Lifton in California and Mo in New York gave me copies of the film.

[Discussion off the record.]

Q. If Mo Weitzman were to say that he never had a copy of the Nix film, that is, everything that he produced he gave back, would you have any reason to disagree with that?

A. I would have to, yeah.

Q. Are you certain that Mo Weitzman gave you a copy of the Nix film?
A. Yeah.

Q. Do you know approximately -- let me withdraw that.

In your prior day of deposition you said that that 35 millimeter Nix film was given to you by Mo Weitzman in approximately 1973. Is that correct?

A. That is correct.

Q. That would mean necessarily that the film stock from which the Nix film was made would have necessarily been made prior to 1973; is that correct?

A. Either during 1973 or prior to that point.

Q. Approximately, yes.

A. Yeah.

Q. If the film stock on which the Nix film you gave to us was manufactured in the 1980s, then that would indicate, would it not, that the film was not given to you by Mo Weitzman in the 1970s, wouldn't it?

A. Either that or it would mean that the print was made at a later time after -- after the negative had been made.

Q. When was the print made from the 35
millimeter Nix film that you gave to us --

A. That I don't --

Q. -- for the first deposition?

A. That I don't know. I don't know when

the print was made.

Q. Well, is the version that you gave to us

in the deposition the exact same film that Mo

Weitzman gave to you in 1973?

A. I believe it is. Or it was made in '73

and he didn't give it to me until some later point

in time. That I don't know. I know that there

was a -- I know that there was a 16 millimeter

print because I showed -- I showed that print in

Georgetown University on November twenty- -- the

night of November 22nd, morning, early morning of

the 23rd in 1973. And that's -- that particular

print that I had at that time, I know I got back

then. Whether I had gotten the 35 millimeter

print then or at some later time, that I'm not

sure of. But I know that this is print made

directly -- I did get this from Mo. I'm just not

sure what time.

Q. Well, my next question for you had been,

was the 35 millimeter film the one you showed at

Georgetown and I assume the answer now is it was
not.

A. It could not have been because it was a 16 millimeter projector.

Q. Where is the 16 millimeter film?

A. That I do not know. If I'm not mistaken, that's edited into a compilation film that I have of the -- of just different films together. Old Zapruder, Nix, Muchmore, all that old stuff, I put together an original reel which I showed to Congress and to the congressional delegation.

Q. Where is that original reel now?

A. That I'm not sure of. I'd have to -- I'd have to find that. I know it exists or it's around somewhere, but I don't know where that one specifically is.

Q. It's my understanding that that film that you've been referring to as the original film reel is called for by the subpoena and I'd like to ask you to look for that and make that available.

A. Okay. Now, the 35 millimeter that I gave you is the same generation and would be a better quality, since it is 35 millimeter. So it would be the better of the two. But let me get that.
Q. Is there any other way that you describe that particular film to yourself that would be a way that we could refer to it as one that spliced together different several films?

A. No. I just call it a compilation.

Q. Then I'll call it the compilation. If the 35 millimeter film is in fact on film stock from the 1980s, how would you best explain the origin of the 35 millimeter film?

A. If it is from the 1980s, that would mean that I got -- either got the print from Mo at some later time or -- actually, that's the only thing I can think of because, remember, I told you that Mo had given me some materials later on at a later period of time? I would think that that's where that would have come from. There was also another print from David Lifton in California at about the same time or the following year, something of that nature.

Q. Are you absolutely certain that you received a print of the Nix film from Mo Weitzman?

A. Yes.

Q. At the time of your work for the HSCA, did you make any copies of the Nix film?

A. No. As a matter of fact, I requested
from them to be able to, specifically around the area of the head shot. And they told me that they had had it and they'd already returned it. They did not grant me access to the Nix film at any time, although that was one of the things I wanted to do more than virtually anything else.

Q. Did you ever see an eight millimeter version of the Nix film?
A. Not that I'm aware of. I don't think I've ever seen an eight millimeter copy of the Nix film.

Q. When did you first show --
A. Oh, wait. Wait a minute. Wait a minute. No. Let me take that back.

In the National Archives -- in the National Archives, I believe there was an eight millimeter copy of the Nix film. The FBI had an eight millimeter copy of the Nix film. And as I recall -- I'm not -- I'm not really clear on this. I believe they were both eight millimeter copies. The FBI had one and the National Archives had one. And there was some kind of a switch that Gail Nix Jackson had made. The FBI had apparently given her their copy and they had somehow or other traded off because it was the better copy she
wanted and the better copy was in the Archives, or something of that nature. I'm not -- I don't remember exactly what it was. But as I recall, those were eight millimeter copies.

Q. Did you ever hear anyone say that the original eight millimeter Nix film was housed in the National Archives?

A. No, hum-um. I don't believe so. As I recall, there was some question about what had happened to it because when the House Committee had it -- they told me that they had returned it to -- I guess it was WTN in those days, World Television News. But after the House Committee had broken up, after they no longer existed, I heard all sorts of stories from Gary Mack and others that original materials had been put in -- placed in the Archives and not returned to the original people that had owned them. Specifically, as I recall, the Moorman photograph is one of those. And when you -- when the House Committee couldn't find the receipt for the original film initially, it had been hypothesized by Gary Mack that the film may have been turned over to the National Archives in bulk with other materials. But then somehow or other during the
search to try to find out what happened to Gail's film, they found the receipt from WTN that it had been returned to them.

Q. Did you ever hear of anyone affiliated with WTN saying that the original Nix film had gone to the National Archives in 1967?

A. In '67?

Q. Yes.

A. No. WTN didn't even exist in '67.

Q. I didn't say that WTN existed in '67.

A. Oh, that the film had gone there in '67.

Q. Or that --

A. No. No, I don't think so.

Q. Or that UPI had sent the original Nix film to the National Archives in 1967.

A. That couldn't have been true because -- if anyone did say that, it couldn't have been true because they had the original film that for -- unless they got it out of the Archives, for "Executive Action".

Q. How do you know that they had the original film for "Executive Action"?

A. Well, the clarity of the image. That was blown up to 35 millimeter. If it had been
from a duplicate, it would have been nowhere near that clear. It would have been -- it would have been contrasting, blurry, out of focus.

Q. Did you at any point in 1991 represent Gail Nix Jackson?

A. Did I represent her?

Q. Yes. Or perform any -- or perform any work for her?

A. There was a time in 19-- around that time. I can't remember the exact year when it was. But she asked me to pick up films from WTN in New York, all of their duplicates that belonged to her, for her, and I did.

Q. In conjunction with that work, did you see any documentation either from Gail Nix Jackson or from WTN or UPI about ownership rights or interests in the Nix film?

A. Not that I'm aware of. That particular day -- this is kind of weird, as far as if I had seen them, I wouldn't have known it. I was trying out contact lenses for the first time in my life and was having a lot of problems with them. And they were hurting. And I had to take one out of one eye and I was practically blind in one eye anyway and it was the wrong prescription. So I
had a real hard time that day and I had to drive
to New York that day. And the only time there was
any paperwork that I'm aware of that I was
involved in was signing for the prints at WTN.

Q. Can you explain just very briefly who
Gail Nix Jackson is?

A. Gail Nix Jackson is the granddaughter of
Orville Nix, Sr., who had taken the Nix film.

Q. How did you come to provide services for
Ms. Jackson?

A. When we were making the movie "JFK", one
day when I was up at the art department here in
Dallas, she had come in. They had licensed the
rights from her, but she didn't have prints of the
film. And Oliver was going to use my -- copies of
my prints and had license from her.

So somebody who worked for Oliver had
brought her in and we met for the first time. And
I thought she was really nice. And I met Orville
Nix, Jr. too, as I recall, Gail's father, at the
same time. And they seemed very nice and really
concerned that, you know, that they didn't have
the materials. And I offered to and did
subsequently provide them copies of the -- of the
materials on my own. I gave her copies on
videotape and film transfers as well.

Q. And what was your source for the tapes and the transfers that you gave to her?

A. As I recall, the 35 millimeter print that you have now in your possession.

Q. And when is the next time that you spoke with Ms. Jackson about the Nix film?

A. I don't know. We've spoken a lot of times. We've appeared on TV together.

Q. Well, at some point did she ask you to do some work for her related to the Nix film?

A. She's -- she was going to -- as I recall, she was going to license some stuff to overseas somewhere and she asked me to make copies of either -- I can't remember if it was the films or the tapes. It was one of the two. As I recall, the transfer was at Video Post. It was for overseas, as I recall.

We've spoken a lot of times. And she asked me to do the transfer, the change -- the exchange for her, pick up the film from the Archives. And I went to -- no -- to inspect the film in the Archives to see if it was the original. She thought -- she had thought that the FBI copy or the copy that was in the Archives
might have been the original and she wanted me to inspect it for her, and I did. And it was a duplicate. It was not the original.

Q. Approximately when did you talk to her about the possibility of the film in the Archives being an original?

A. That I have no idea. As I recall, she was the one who came up with the concept that it might have been.

Q. Did you -- have you ever -- although I've asked you these questions before, I'm now wondering whether your recollection has been refreshed on whether you recall anyone else or any other circumstance in which someone suggested that the original Nix film is housed by the National Archives.

A. If so, I'm not aware of it. I know that Gary Mack had mentioned several times about the House Committee sending stuff to the -- to the Archives rather than sending it back to the original owners. So that may have had something to do with it. Gary may have suggested it. He may have suggested it to Gail. Gail suggested it to me. Other than that, I'm not aware of anyone else suggesting it.
Q. Do you remember who the person was you made contact with for WTN or UPI?

A. WTN it was in those days. No, I don't. The person who I was supposed to see had already left for the day that day when I went up there. Because I had this problem with the contact lens, I had to drive very, very carefully because I could only basically see out of one eye, and it was raining, as I recall, that day.

And when I went up there to get the stuff, the person who I was supposed to see had left. And I was really upset because nobody wanted to get me the stuff for Gail. Nobody knew where it was or whatever. Phone calls had to be made. And finally everything was straightened out.

And they went through -- so they had all the Nix and Muchmore stuff in the same place. We had to go through everything and see what was Nix and what was from -- what was Muchmore because they retained the Muchmore stuff, the closest things to the originals. That is what they had. And then I picked up all the stuff for Gail and then took it home, wrapped it up and shipped it to her.
Q. How long did you have possession of it between the time you picked it up and the time you shipped it?

A. I don’t know. A day, two, three. I’m not sure. It was very rapid.

Q. Did you make any copies of any of the material?

A. No, because the copies were not that good. There were probably first or second generation Ectachromes, but nothing larger than 16 millimeter. Upon inspecting them, they just weren’t very sharp. They weren’t very good. The copy that I had was already far superior to it.

Q. Do you believe that WTN is still in possession of the original Nix film?

A. Yes.

Q. What is the basis for that assumption?

A. Its value. The Nix film is, outside of the Zapruder film, the most important film of the case, I believe. I also believe that in one way it may be even more important than the Zapruder film.

The first generation copies that I’ve been working with, on that copy I have found movement behind the retaining wall on the grassy
knoll, this being from a copy that’s already a generation removed, or actually two generations removed, considering the fact of the negative that was done in between. That image can be severely enhanced from the original film.

This is why I wanted to borrow it from the House Committee when they had it. They told me it had already been returned and I was very, very upset. I said, "Did you look in that area?" And they told me, "Yeah, we looked. There's nothing there," because where this gub is there is a flash at about the time of the head shot. And I pointed it out to them and they just didn't seem to care. I was very, very upset at that. Of all the things I wanted to do for them, that’s what I wanted to do the most. And they said, "No. We’ve already sent it back."

Q. Did they say to where they had sent it back?

A. I don’t know whether they specifically said to WTN or not, but the implication was that that’s where they had sent it to. And it was Jane Downey who told me it had been sent it back. I remember that very well because I was so frustrated by this.
And my next question, as I recall, was
"Can you get it back?" And I was told no. And I
could be wrong about it. That could just be one
of those memories that you believe. I do believe
I was asked if they could get it back and was told
no.

I was also told at the same time -- I
wanted -- I wanted to work on the Zapruder film,
the original then too. And they said, "Well, the
Zapruder family specifically stated that you," you
meaning me, "are not to touch the film."

Q. And why did the Zapruder family say
that?
A. At that time I don't know. I don't know
specifically why. But they -- that's what the
House Committee told me. They told me I
specifically was not allowed to touch the original
Zapruder film.

[Lunch recess.]

Q. Mr. Groden had something that he wanted
to say about interaction with Ms. Jackson.
A. Yes. Through -- through the years I've
been trying to aid Ms. Jackson in finding the
original Nix film. And she constantly let me know
where she was going with these, with her
investigation and what she was being told. And if it's not already in the record, I think it ought to be.

She told me that representatives of WTN said that they had given both the Nix and the Muchmore film originals to a fellow who worked there and he had placed them in a bank vault in New York City. He was the only one who knew what the bank vault number was, they say, and he died somewhere along the line and no one had realized that he was the one who had this. In the interim, the bank itself was torn down, including all the safe deposit boxes and all the rest.

If that's the story, and it seems awfully convenient that they came up with this, if that -- that's the story that they came up with and told her. So they did admit receiving the films back from the -- from the HSCA and, of course, the receipt was finally found so they did get them back. The question is, did they really put it in a bank vault or did they still have it in their hands somewhere?

Back when UPI had it, Burt Reinhart kept them with -- kept them with him all the time until the -- until it was sold.
Q. I'd like to ask the reporter to mark the next two documents as Exhibit Numbers 7 and 8 to this deposition.

[Exhibit 7 and 8 marked.]

Q. I'll state for the record that Exhibit Number 7 appears on its face to be a document entitled "Nix Release of WTN", apparently signed on the 5th day of April 1993. And the second document, Exhibit 8, is what appears to be on its face to be an acknowledgment for receipt of certain materials, dated on its face 6/28/91. I will also state for the record that there are, on Exhibits Number 7 and Number 8 fax identification numbers, which I presume were not part of the original document.

That said, I'd like to first show Mr. Groden Exhibit Number 7 and ask him whether he has seen the document previously, prior to today.

A. To the very best of my knowledge, and I'm convinced this is absolutely true, I have never seen this before. The release, Nix release of WTN, I have never seen. I've never even heard that this existed.

Q. That is Exhibit Number 7; is that correct?
A. Yes, um-hum.

Q. I'd like to show you a document now marked Exhibit Number 8 and ask you whether that is your signature that appears on the page.

A. It certainly appears to be, um-hum.

Q. Do you have any recollection --

A. Yeah.

Q. -- of having seen that document prior to today?

A. I have to answer that kind of nebulously. I have no doubt that I signed this but, as I had mentioned before previously --

Q. As when we were off the record?

A. No. I think we were actually on the record at the time.

Q. Okay.

A. I'm not sure. I was trying out a pair of contact lenses that day and was having trouble with them and could not really focus. When I signed this, this was supposed to be just a receipt for -- for picking up the films, the duplicate films that were at WTN that afternoon. And as I said before, it was a rainy afternoon and I guess it was, as I recall, pretty close to 5:00 o'clock or so in the afternoon.
Q. Was there any itemized catalogue or itemized inventory created in conjunction with Exhibit 8?

A. That I do not know. They -- the people at WTN had all the Nix stuff and all the Muchmore stuff together, sometimes on the same reel. And what we did is, we reviewed every reel that they had within this inventory that was presented to me and we took off all the Nix footage and they kept all the Muchmore footage.

Q. Did you splice the film to take off the --

A. You mean --

Q. -- separate the material?

A. -- tear them? I did not. They did. As I recall, on some of them. Most of them, as I recall, were just multiple takes on the same rolls or something like that. But these are the -- this, as I -- as I recall, virtually everything was like 16 millimeter. I could be wrong about that. There might have been 35s. There might have been eight. I don’t know. But as I -- I seem to recall it was probably 16 millimeter.

Q. Do you see up at the top of Exhibit 8 what appears to be a reference to 745 feet of
film?

A. Approximately -- yes. It says approximately 745 feet of film.

Q. Do you know how that figure was reached?

A. No.

Q. Did you ever play any role in measuring the length of the film?

A. I don't believe so.

Q. Do you know whether the 745 feet included leaders or not?

A. I would assume that it would. I don't know. I don't know how they reached that figure. As a matter of fact, I couldn't even focus. I didn't even know it said 745 feet. This is the first time I've ever seen this in focus.

Q. Were you given a copy of Exhibit Number 8?

A. I do not think so. If I was, it went on to Gail, to Gail Jackson.

Q. Have you ever had a discussion with her as to whether she ever received a copy of either Exhibit 8 or a document that would have the same sort of effect as Exhibit 8?

A. No. I don't believe I have.

Q. As best you are aware, is there any
possibility that you are the person who created
the 35 millimeter print of the Nix film --
    A. You mean from --
    Q. -- that you -- that you provided to the
Review Board?
    A. That I was the one who had created the
print?
    Q. Yes.
    A. It's -- it's possible. I can't say that
it's impossible.
    Q. To the extent that you created the 35
millimeter print, what would your source have
been?
    A. Well, for the actual print, it would --
had to have been a negative.
    Q. Did you ever have in your possession,
custody or control a negative of the Nix film?
    A. That I don't know. If indeed I did
that, I must have had one. I do not at the
present time have one. I do not know that I have
one. I will look.
    Q. Yes, please do.
    A. Okay.
    Q. When you say that you are going to look,
where is it that you will look?
A. I will-- I will check every roll of film I have in my possession.

Q. Where are the films that you have now that relate to the Kennedy assassination?

A. In my apartment.

Q. They're in Dallas now--

A. Yes, um-hum.

Q. -- is that correct? So those films have all been moved from Boothwyn--

A. Yes, um-hum.

Q. -- Pennsylvania. Other than in your apartment in Dallas, is there any other location where you have stored films related to the Kennedy assassination-- let me withdraw that and say, other than with the Archives, which you previously mentioned, and your apartment, is there any other place in which you are now storing films relating to the Kennedy assassination?

A. The only one I'm aware of, and it's an individual one, would be the negative for the slide set that we spoke about before. That one I know I don't have with me. It was a big reel in a very large can, so it's-- I know-- I'm pretty sure I know where that is. That's in Pennsylvania.
Q. Where is that in Pennsylvania?
A. In the house where I just moved from.
What I will do, I have to go up there at the
beginning of October. I will -- I will do a
search of everything that's up there. If I find
anything else, I'll let you know. But I'm sure
that that one is there.
Q. I'd like to turn to the Muchmore film.
Is it your testimony that EFX Unlimited had access
to the original Muchmore film?
A. Yes, um-hum.
Q. But you did not see the original
Muchmore film while it was at EFX Unlimited; is
that correct?
A. That's correct. I didn't work there at
the time.
Q. For the 35 millimeter version of the
Muchmore film that you provided to the Review
Board, was that material wet gated?
A. Yes. I'm sure it was. You can -- you
can see the liquid traveling on the frames.
Q. Do you know what kind of film stock the
Muchmore film was that you gave to the Review
Board?
A. Color print film.
Q. Do you know which brand --
A. No.
Q. -- which manufacturer?
A. No, I don't. I would assume it's, in all probability, Kodak. But it doesn't necessarily have to be. It depends on whatever the lab was printing on in those days. Color print film.
Q. Could you explain briefly what a contact print is?
A. Okay. There are three different types of film printing. Optical printing, which is you use a series of lenses or a lens between the original film and the copy. A contact print is a continuous run of print where the original film is pressed up against the unexposed film or raw stock and is struck by light, and a contact print is made that way. The third one is called a precision print, which is very much like a contact print except that it's not a continuous run. It's an individual frame situation. It's halfway between the two, but no lenses are involved.
Q. Do you know whether the 35 millimeter Muchmore film that you delivered to the Review Board was a contact print?
A. I don't know. I would assume it is because very rarely are optical prints made. Usually optical printers are used for negatives and laboratories that do printing. Print houses like TVC or Cine Lab or any of those movie labs in New York, they almost always, almost exclusively use contact printing.

Q. I believe previously in your prior deposition you stated that the circumstances through which you acquired the Muchmore film were the same as those for the Nix film.

A. Yes.

Q. Is that a fair statement?

A. Yes.

Q. Did you ever have access to the camera original Muchmore film?

A. Never. Never in my life.

Q. Did you ever have access to a negative of the Muchmore film?

A. That I'm not sure of. I don't know. I don't think so. I honestly don't think so, but I can't rule it out. It's possible I might have.

Q. What -- when you say that you're unable to rule it out as a possibility, what kind of considerations are going into your mind?
A. Well, as I said, I received a lot of materials from Mo Weitzman some years ago. I don't remember what all those materials are. If there was a negative for the Muchmore film, I would love to have it because I would like to make a print of it. I'd like to make a good print of it. When we were looking for Zapruder negative, we were also looking for Nix and Muchmore as well.

To the best of my knowledge, I never had negatives of either Nix or Muchmore. But if I say I didn't and I did, I don't want to mislead you. I have no recollection or no knowledge of ever having one, not a first generation one. I know that I made a copy negative from the print I was given as a protection, which is a later generation away from the -- from the print.

At the time, as I recall, I had only one 35 millimeter print of Nix and one 35 millimeter print of Muchmore. I do believe that was all there was. So anything that was created after that point would have been a later generation and anything that would have printed like 16 millimeter or anything else after that point would be like two generations away.
Q. Did the HSCA have access to the original Muchmore film?

A. I assume they did. I don't know that I ever specifically discussed the Muchmore film with them. The Muchmore film goes by very quickly. At the moment of the head shot, there's a splice in the film.

The Nix film is the one I was really considering the most important at the time because I knew there was something there, some information there that would help the case. That's what I was most concerned with.

I don't know that I ever mentioned Muchmore to them. Besides, I already had a copy of it.

Q. I would like to show you a document that purports to be a listing of all of the original films that were used by the House Select Committee on Assassinations and I'd like to ask you to identify whether you can see anything on the listing that is inaccurate. I'll state for the record that this comes from Volume VI of the hearings of the HSCA. And, unfortunately, there is not a page number on the photocopy that I have, but it is Paragraphs 39 through 42 of the report.
They appear under a Section C entitled "Source Materials for Enhancement". I have highlighted the films that are suggested to be originals that were in the possession of HSCA. Those that are not highlighted were not in the possession of the HSCA; that is, the originals were not in the possession.

Mr. Groden, is there anything on that list that you can identify as being inaccurate?

A. You mean just Section 5, dealing with motion pictures?

Q. All of those --

A. The whole thing?

Q. -- that are highlighted. Any of those we'll start out with any of those that are highlighted that you believe the HSCA did not have access to the camera original film.

A. Some of these I have no way of knowing. I know they had the original Mary Moorman Polaroids. I know they had those.

I can't see anything that I -- there's a notation about me here too. Okay. There is nothing here that I see that I think is inaccurate.

I know they had the original Towner
film. I know they had the original Dorman film. They had the original Hughes film. And -- but Nix and Muchmore, again, I have to take their word for it because I didn’t see those. And I know -- I know that they had the original Zapruder film because they were talking about it so often, that they didn’t want duplicates, they wanted the originals.

I don’t see anything here that seems to be inconsistent with what I believed to be true before.

Q. Okay. You make reference to the list, but I’m going to go through some of the films and ask you whether you yourself had access to the originals of the films. These would not be things that you heard about but you were able to perform some sort of work.

A. Okay.

Q. First, the Altgens film.

A. Altgens is a -- is an individual photograph. That’s not a film.

Q. I’m sorry. Yes.

A. Yes.

Q. Betzner?

A. Betzner, yes.
Q. Bronson?

A. The work I did on Bronson I did before they got it. They -- let me -- let me -- let me modify that. What I was told, they had the Bronson film, returned it to them. Then Bronson came to me and asked me to do the work, which I did. I did the work. And then, as I understand it, it went back to them. So the work I did on that was not while they had it. They got it back again and sent it to Aerospace in California, as I understand it, after I had it.

Q. Who sent the Bronson film to you?

A. Charles Bronson and Gary Mack and -- this is going to sound terrible because I have a blank spot as to his name. A reporter for the Dallas Morning News. Help me. This is terrible. He's such a nice guy too and I can't remember his name. He's going to hate me when he sees this. I can't remember.

They sent it to me. They had -- they called me up very excited that they found this new film of the assassination. At the time I didn't know that the HSCA had already seen it and rejected it, said there was nothing there of any value.
Q. Bell?
A. I believe they did have the original Mark Bell film.
Q. Did you have access to that yourself?
A. I probably did. I think -- yes. I would say yes.
Q. All right. Dillard?
A. The Dillard, again that's not films; that's individual photographs. And those are the ones that were damaged by them when they -- when they applied the radioactive coding to them. Yes, they had those.
Q. And you had access to those?
A. Yes, uh-huh.
Q. Hughes?
A. Hughes, yes, I believe they had the original of that too.
Q. And did you have access to --
A. Yes, um-hum.
Q. -- the film?
A. Not through them. I don't think through them. I got those from Jim Towner and Gary Mack years earlier, as I recall. I don't think I got
those through the HSCA.

Q. Or the Tina Towner film?
A. The Tina Towner film, definitely from the HSCA. I remember that.

Q. That you had access to that yourself?
A. Yes, uh-huh.

Q. Did you have access to the Elsic Dorman images?
A. Yes.

Q. Did you yourself have access to the Oswald backyard photographs?
A. The originals?
Q. The originals.
A. Not through the Committee. I got -- the only thing I -- the only time I ever actually saw the original backyard prints and negative was -- were in the National Archives, and that was years before the HSCA. I do not believe I had any access through the HSCA.

Q. Powell photographs?
A. Yes. They sent -- they gave me the original Powell photograph to work on.

Q. While you were at the HSCA did you have access to any other films that you are now able to identify in addition to those that I just
Individual photographs? I had access
to -- literally to thousands, I would say
thousands of images, certainly several hundred.

While you were at the HSCA.

Yeah, um-hum.

In terms of films?

There were, as I recall, some things
that they had gotten from -- from television news
films, as I recall. I think large reels, of which
I don't know if I did anything with those. I
can't remember if I did. If anything, it was
transferred to video. But I really don't think so
because I don't seem to have anything like that.

I'd like to find out about any other of
the -- if we can refer to them as the Dealey Plaza
assassination related films where you might have
had access to the originals. Previously you
mentioned that you had access to the Zapruder film
by Life Magazine; is that correct?

Yes.

You've also mentioned that you had
access to the Bronson film when he sent that to
you --

Yes.
Q. -- is that correct?
A. Um-hum.
Q. Did you also have access to the Jack Daniel --
A. Yes.
Q. -- images?
A. Yes. Jack Daniel, Gary Mack sent that to me as well.
Q. And Willis slides, did you have access to the original?
A. I don't believe I ever did have access to the originals.
Q. For any of the Willis slides?
A. I don't believe so. I know the Committee did some computer enhancement work on Willis slides, but I had nothing to do with that.
Q. Mr. Groden, before we conclude today I'd like to ask one additional time in regard to the subpoena that was issued to you as modified. With the exception of the films that you brought during the first day of deposition and today and with the exception of the ones that we have talked about and I have asked you to go back and make a further search on, are there any other early generation films called -- films or photographs called upon
by the subpoena that you have possession, custody
or control of that you have not identified for me
in these depositions?
    A. To the best of my knowledge, no.
    Q. Do you have any objection to notifying
me promptly if you learn that you do have another
film or photograph that you had not previously
considered?
    A. No objection at all.
    Q. Okay. The assumption then will be that
you'll be under a continuing obligation, at least
for the life of the Assassination Records Review
Board, to notify us of any additional early
generation or original films or photographs that
are called for by the subpoena and letters of
limitation.
    A. Okay.
    Q. Is that fair? Thank you very much.
    A. Okay.

[Adjourned 1:49 p.m.]
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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
STATE OF TEXAS *
COUNTY OF DALLAS *

I, Jill Johnson, a Certified Shorthand Reporter in and for the State of Texas, do hereby certify that, pursuant to the Notice and subpoena, there came before me on the 20th day of August, 1996, at 9:12 a.m., at the offices of the United States Attorney, Dallas, Texas, the following named person, to wit, ROBERT J. GRODEN, who was by me duly sworn to testify the truth, the whole truth and nothing but the truth of his knowledge touching and concerning the matters in controversy in this cause; and that he was thereupon carefully examined upon his oath and his examination reduced to writing under my supervision;

That the deposition is a true record of the testimony given by the witness, same to be sworn to and subscribed by said witness before any Notary Public.

I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or
financially interested in the action.

In witness whereof, I have hereunto set
my hand and affixed my notarial seal this 25th
day of August, 1996.

[Signature]

Jill Johnson, Certified
Shorthand Reporter in and for
the State of Texas, CSR #259

Suite 22
3508 Greenville Avenue
Dallas, Texas 75206
My certification expires December 31, 1996.