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June 26, 2026

Copyright Claims Board

Docket No. 24-CCB-0263

Cade J. Campbell, Claimant,

v.

Dallas County Historical Foundation d/b/a The Sixth Floor Museum at Dealey Plaza,

Respondent.

CLAIMANT'S REQUEST FOR RECONSIDERATION OF FINAL DETERMINATION

Claimant Cade J. Campbell, appearing pro se, respectfully requests reconsideration of the Final Determination dated May 27, 2026, under 37 C.F.R. § 230.2. Claimant submits no new evidence. This request addresses the specific reasons the Board gave for finding that Claimant failed to prove ownership, because the Board stated that the result hinges entirely on whether Claimant proved ownership by a preponderance of the evidence. Final Determination, p. 2.

The material errors are not merely disagreements with the outcome. They concern the evidentiary premises the Board used to reject Claimant's ownership: the Keya Morgan negotiations and alleged skepticism; Ron Jordan's credibility; the April 1964 print date; absence of a negative; the Museum's Titus provenance, oral histories, and sequence theory; the unmounted slide; third-party prints; the Love Field evidence, including the Proctor photograph; Mack White's analysis; and the effect of Claimant's registration and notarized chain of title.

I. The Board materially misread the Keya Morgan evidence and used negotiation context as ownership weakness.

The Final Determination relied on the 2013 Keya Morgan communications as part of its factual history. It stated that Morgan's assistant was skeptical, called the Work a low-quality cropped copy, referred to a better quality original available for $300, and quoted Claimant's explanation that Ron Jordan's print was a reproduction made in April 1964 while Ron remained true to his story that his father was the photographer. Final Determination, pp. 2-3; Dkt. #28, Exhibit 6.

The material error is that the Board treated this arms-length pre-purchase negotiation as evidence undermining ownership without addressing the full context. At that time, Claimant was assisting Ron Jordan, not claiming to own the copyright himself. Morgan still sought to buy the photograph and alleged copyright. Claimant advised Ron to reject Morgan's offer because Morgan appeared to be attempting to acquire all copies and register the copyright as his own. Final Determination, p. 3; Dkt. #28, Exhibit 6.

The reference to an April 1964 reproduction was a statement about the physical Kodak print, not an admission that Jack Jordan was not the photographer or that Ron lacked copyright rights. The Morgan evidence therefore cuts both ways: it shows skepticism from a prospective buyer, but it also shows that Ron Jordan controlled whether to sell the photograph and rights, that Morgan still pursued those rights, and that Claimant disclosed the entire exchange rather than hiding it. The Board's use of this evidence to discount Ron Jordan's credibility was materially incomplete.

II. The Board gave insufficient effect to Ron Jordan's notarized affidavit and Bill of Sale.

The Final Determination questioned why the now-deceased Ron Jordan's statements should be deemed credible, especially because others viewed the print as a later copy. Final Determination, pp. 3-4. But Ron's evidence was not an informal after-the-fact rumor. Ron signed a notarized Affidavit of Fact stating that his father, Jack Jordan, worked near Love Field, walked to the

airport, stood on a boarding ramp, and made the Kodak snapshot. Ron also signed a notarized Bill of Sale transferring the photograph and rights to Claimant. Dkt. #28, Exhibits 4-5.

The Board could weigh this evidence, but it was clear error to let third-party skepticism about whether Claimant possessed an original negative or later print substitute for proof that Ron lacked rights. A later physical print can be a copy of an earlier image while copyright remains with the photographer or successor. The credibility issue should have been analyzed against the record-supported chain of title, not treated as defeated by the existence of copies or skepticism from parties who did not prove authorship.

III. The Board gave the April 1964 date stamp and absence of a negative more provenance effect than they can bear.

The Board found it particularly damning that Claimant did not appear to possess the original negative and that Claimant's print was date-stamped April 1964, which the Board said strongly suggested the Work was a copy made five months after the assassination and after Jack Titus allegedly disseminated his photographs. Final Determination, p. 4.

A print date proves, at most, when that physical print was processed or made. It does not identify the photographer, prove the source negative, prove that the print came from the Museum's transparency, or defeat a copyright transfer. Copyright ownership does not require possession of the original negative. The record also makes a spring 1964 print date unsurprising because the Museum itself relied on Richard Tullius's account that participants in a post-assassination photo exchange made copies of original slides for one another. Dkt. #43, pp. 2-3; Dkt. #56, Exhibit C. The April 1964 date is therefore consistent with the copying history described by both sides; it does not prove Titus authorship.

IV. The Board overstated the Museum's oral-history provenance, especially Sally Dobbie's testimony.

The Board accepted the Museum's detailed history, including oral histories from the donations of the alleged Titus Series. Final Determination, pp. 5, 7. Claimant does not deny that Sally Dobbie repeated a family attribution that her father had a sequence of five motorcade photographs. The error is that the Board gave that oral history provenance weight beyond its foundation.

Ms. Dobbie did not testify from first-hand knowledge that she saw Jack Titus take the disputed photograph. She did not provide a specific remembered statement from Jack Titus identifying the disputed image or explaining its creation. Instead, her testimony contained substantial limitations: she said she did not recall what her father talked about; when asked whether he shared anything about the pictures, she answered, "No. He didn't share anything in particular"; and she stated that the photographs were not displayed or really discussed in the family and were found years later among family materials. Dkt. #56, Exhibit D; Dkt. #50, pp. 4-6.

That is later family-provenance testimony based on possession and attribution, not first-hand authorship testimony. The Board could consider it, but treating it as strong confirmation that Jack Titus authored the disputed photograph materially overstated its foundation.

V. The Board accepted the Museum's Titus sequence without resolving contrary sequence evidence.

The Board accepted that the Work is slide 4 in a five-image Titus Series, taken sequentially from Cedar Springs Road, and relied on Tullius, Cedar Springs visual comparisons, and Hine Pontiac/map evidence to explain the pavement and angle. Final Determination, pp. 5-7.

Claimant submitted record evidence challenging that premise, including evidence that alleged "Titus slide #3" was attributed to S. Winters/Great Western Finance in December 1963. Dkt. #32, Exhibit 26; Dkt. #50, pp. 5-6. That evidence matters because the Museum's theory depends on all five slides functioning as a coherent Titus-authored sequence. If one image in that sequence had a conflicting attribution, the inference that all five were authored by Jack Titus is materially weakened. The Final Determination did not resolve this conflicting attribution before accepting the Titus sequence as the basis for rejecting Claimant's ownership.

The Board also relied on map evidence to explain the pavement differences. Final Determination, p. 7. But Claimant had argued that the Hine Pontiac/Cedar Springs comparison did not match the Jordan image and that the disputed image showed Love Field identifiers absent from the Hine scene, including the COE airport vehicle, airport-type mechanic, powerline cables, green pickup, and blue vehicle context. Dkt. #50, pp. 11-13; Dkt. #56, Exhibit A. The Board's analysis did not address those specific differences.

VI. The unmounted Museum slide does not definitively prove copying direction or authorship.

The Board stated that the unmounted Titus slide showed more of the photograph than Claimant's copy and "definitively demonstrates" that Claimant's Work was copied from the Museum's photograph, not the reverse. Final Determination, p. 5.

That conclusion exceeds what the evidence establishes. A wider transparency may show that the Museum possessed a version with a wider image area than Claimant's April 1964 print. It does not, by itself, prove that Jack Titus exposed the film, that the Museum's transparency was the original source image, that Claimant's print was copied from that specific transparency, or that

both images did not derive from another earlier source. Because the record includes evidence of widespread post-assassination copying and slide exchange, the unmounted slide bears on copy history, but it does not answer the dispositive authorship question.

VII. Third-party prints and skepticism are not proof of Titus authorship.

The Board noted that third parties such as ICP possessed prints predating Claimant's April 1964 copy and that third parties had expressed skepticism about Claimant's ownership. Final Determination, pp. 4-5. But an earlier third-party print proves only that another copy existed earlier. It does not identify the photographer or copyright owner. Likewise, skepticism by ICP, Morgan, or others is not authorship evidence. The Board's ownership decision materially depended on treating the existence of earlier or wider-distributed copies as though it defeated Claimant's chain of title. That is a non sequitur unless the evidence also proves who authored the source image.

The Board also questioned whether the Work was unpublished when registered. Final Determination, pp. 6-7. But the Board acknowledged that, if the Work was owned by Jack Jordan and then Ron Jordan, there was no evidence of an authorized publication more than five years before registration. Id. Because the Board proceeded to apply the presumption arguendo, the critical issue remains whether the Museum actually rebutted Claimant's ownership evidence, not whether unauthorized or uncertain copies circulated.

VIII. The Board mischaracterized Claimant's Love Field evidence as vague or generic.

The Board characterized Claimant's Love Field evidence as mostly vague and generic statements about a similar yellow vehicle, a mechanic's uniform, and asphalt, and it discounted Mack White because Claimant had not obtained approval for expert testimony. Final Determination, pp. 4, 7.

Claimant's evidence was more specific than that. It included Ron Jordan's sworn account of a Love Field boarding-ramp vantage; LTV/Peeler Street proximity evidence; Love Field visuals showing boarding ramps, airport personnel, powerline cables, airport vehicles, and the hangar/concourse setting; Tullius statements concerning the Continental concourse area and lack of meaningful security or fencing; and specific comparisons explaining why the Hine Pontiac/Cedar Springs image did not match the disputed image. See Dkt. #28, Exhibits 4, 5, 7, 7A-7K, 7O-7Q, 16, 17, 21A; Dkt. #50, pp. 11-15; Dkt. #56, Exhibits A, C.

The Proctor photograph was also materially narrowed. Claimant did not offer the 1966 Proctor photograph as proof that the exact same vehicle appears in both images. Claimant offered it as location corroboration: the Love Field Continental Hangar/concourse setting, the same type of flat-front COE airport vehicle, matching wheel characteristics, a boarding ramp, a red TEMCO/LTV vehicle, and the Continental Hangar environment. Dkt. #50, pp. 12-13; Dkt. #28, Exhibits 7K, 21A. Treating this as merely a color dispute--yellow, orange, white, or cream--misstates its evidentiary purpose.

The Board also did not address Claimant's related physical-location point that the disputed image appears to show an open airport concourse/apron environment, not a city street or dealership parking lot with curbs and roadway features. Claimant specifically argued that the Jordan image lacks the street-curb setting shown in Cedar Springs/Hine materials and instead matches the Love Field hangar-concourse context shown in Claimant's exhibits. Dkt. #50, pp. 11-15; Dkt. #56, Exhibit A; Dkt. #28, Exhibits 7, 7A-7K, 7O-7Q. Reducing that evidence to generic references to asphalt failed to address the specific physical comparison Claimant raised.

Claimant does not ask the Board to treat Mack White as an approved expert if the procedural rule was not satisfied. But the underlying Love Field observations existed independently in photographs, videos, affidavits, and exhibit comparisons. The Board should not disregard record-supported visual/location evidence simply because some of the same conclusions were discussed by Mr. White.

IX. The Gift Agreement and collection label do not prove authorship.

The Museum's 2012 Gift Agreement describes "Five 35mm color slides of the Kennedy motorcade, November 22, 1963" and states that the gift should be acknowledged as the "Jack A. Titus Collection." Dkt. #45, Exhibit 1. But the agreement does not individually identify the disputed photograph, does not state that Jack Titus personally took each image, and does not include any statement by Jack Titus. Claimant does not ask the Board to decide medical capacity here. The narrower point is that a collection label and donation document are provenance evidence, not independent proof that Jack Titus authored every image in the collection. Claimant also identified an internal inconsistency in the Museum's oral-history provenance: the Museum relied on a rooftop account, while Claimant cited Tullius oral-history materials in which Museum Director Gary Mack described a different elevated-vantage "secret" involving a chair with a small electric motor. Dkt. #50, pp. 4, 9-10; Dkt. #56, Exhibit C. Claimant does not raise this to prove which story is true, but to show that the Museum's own provenance record was not as settled as the Final Determination treated it.

X. The registration and notarized chain of title remain material ownership evidence.

Claimant submitted Copyright Registration No. VAu 1-163-383, effective January 17, 2014, along with Ron Jordan's notarized Affidavit of Fact and notarized Bill of Sale. Dkt. #28, Exhibits

1, 4, 5. The Board acknowledged the registration and assumed the presumption arguendo, but held that the Museum easily overcame it. Final Determination, pp. 6-7.

That conclusion depended on the material errors identified above: reading the Morgan negotiations against Claimant without full context; discounting Ron Jordan based on third-party skepticism about copy status; giving the April 1964 print date and absence of a negative too much provenance weight; treating Dobbie/Tullius oral-history provenance and the collection label as authorship proof; treating the unmounted slide as definitive; accepting the Titus sequence without resolving conflicting attribution evidence; and minimizing the Love Field evidence. Correcting those premises materially changes the ownership analysis.

Under the corrected view of the record, the Museum did not rebut Claimant's registration, notarized affidavit, and notarized Bill of Sale by a preponderance of the evidence. At minimum, the record does not support dismissal with prejudice on the ground that Claimant could not prove ownership.

XI. Requested relief

Claimant respectfully requests that the Board grant reconsideration, correct the factual and legal errors identified above, vacate the dismissal with prejudice, and issue an amended final determination recognizing that Respondent did not rebut Claimant's ownership evidence by a preponderance of the evidence; or, alternatively, reconsider the ownership determination under the corrected factual premises and address the remaining issues as appropriate.

Respectfully submitted,

/s/ *Cade J. Campbell*

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Date: June 26, 2026

CERTIFICATE OF SERVICE

I certify that on June 26, 2026, I filed this Request for Reconsideration through eCCB and served a true and correct copy on Respondent's counsel through the eCCB service system and/or by the method required by the Board.

/s/ *Cade J. Campbell*

Proof of Delivery

I hereby certify that on Friday, June 26, 2026, I provided a true and correct copy of the Claimant's Request for Reconsideration of Final Determination to the following:

Dallas County Historical Foundation AKA Sixth Floor Museum at Dealey Plaza, represented by Charles Ed Phipps, served via ESERVICE at cphipps@lockelord.com

Signed: /s/ Cade J Campbell