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EXHIBIT PACKET

Claimant's Request for Review by the Register of Copyrights

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.

Exhibits Included

Exhibit A: July 15, 2026 Email to the Copyright Claims Board and Respondent's Counsel (p. 02 of 25)

Exhibit B-1: Timestamped Transcript of the Keya Morgan Recording (p. 04 of 25)

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Exhibit C: Prior CCB Exhibit Table Identifying the Keya Morgan Recording (Exhibit 6 / 6A) (p. 14 of 25)

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EXHIBIT A

July 15, 2026 Email to the Copyright Claims Board and Respondent's Counsel

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.

Source Document

Email dated July 15, 2026

Purpose

Procedural clarification regarding whether the Keya Morgan recording was accepted into eCCB as a playable media exhibit.

Gmail **Entertainment History LLC <entertainmenthistoryllc@gmail.com>**

24-CCB-0263 : Procedural Clarification Regarding Exhibit 6A / Keya Morgan Recording

Entertainment History LLC <entertainmenthistoryllc@gmail.com> Wed, Jul 15, 2026 at 4:03 PM
To: Copyright Claims Board <asktheboard@ccb.gov>, "Booth, Dan" [redacted] "Cronin, Natalie E" [redacted]
Cc: "Lindsay Calhoun (1315)" [redacted], "Mary Ellen Roy (1254)" [redacted], "Foister, Kara" [redacted], "Phipps, Charles" [redacted] "Davison, Tucker" [redacted], "Collins, Michael H." [redacted]

Dear Copyright Claims Board Staff,

I have a procedural question regarding my pending Request for Reconsideration in **Campbell v. Dallas County Historical Foundation d/b/a The Sixth Floor Museum at Dealey Plaza, Docket No. 24-CCB-0263**.

I want to clarify the status of the **Keya Morgan recording**, which was identified in my uploaded exhibit materials as part of **Exhibit 6 / Exhibit 6A** concerning Keya Morgan's November 2013 attempt to acquire rights in the Jordan Photo.

My amended exhibits table identified **Exhibit 6 – Keya Morgan Communication** as including emails and an audio-recorded conversation regarding Morgan's attempt to acquire rights in November 2013, including the recorded call between Keya Morgan and myself about the Jordan Photo.

Separately, during discovery, on **April 3, 2025**, I produced the recording to Respondent's counsel by email. The file was titled:

"Keya Morgan Phone Call with Cade Campbell about Jordan Photo - Nov 2013.mp4."

I am not submitting supplemental argument or attempting to introduce surprise evidence. My concern is procedural. The recording was identified in my exhibit materials and produced to Respondent's counsel during discovery, but I am uncertain whether the media file itself was successfully accepted into eCCB as a playable exhibit.

Should I file a formal notice, corrected exhibit submission, request, or other procedural clarification while reconsideration remains pending?

I have copied Respondent's counsel on this email.

Respectfully,

Cade J. Campbell
Claimant, pro se
Copyright Claims Board Docket No. 24-CCB-0263

EXHIBIT B-1

Timestamped Transcript of the Keya Morgan Recording

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.

Source Document

MP4-aligned timestamped transcript
Audio recording date: November 26, 2013
Source media duration: approximately 09:30

Purpose

Transcript aligned to the public-access MP4 / YouTube version of the Keya Morgan recording.

EXHIBIT B-1

MP4-Aligned Timestamped Transcript of the Keya Morgan Recording

Audio Recording Date: November 26, 2013

Source Media File: Keya Morgan Call - 2013 Ron Jordan JFK Photo Rights Discussion.mp4

Source Media Duration: approximately 09:30

Transcript Note: Prepared from the audio recording and existing transcript. Timestamps are approximate reference markers aligned to the MP4 public-access video file located at https://www.youtube.com/watch?v=JUYHrt6tPC8. Inaudible or uncertain portions are marked where applicable. Bracketed notes identify context and are not spoken words.

[00:00] Keya Morgan: (inaudible) you left out. Big deal. [unclear; sounds like “jumped on the”] (inaudible) left out a bunch of them. But I mean if some crazy lunatic wants to feel that way, you know, he's welcome to.

But here's, here's, here's what I think. It's easy. Tell him to forget me. Tell him I disappeared. I'm not interested. It's over.

And, and you can buy it yourself. And I'll buy it from you, and I'll give you a commission on it, and then you own it. And then if we buy it from you, then everything is completely legal. How's that?

[00:27] Campbell: Ummm... I don't know about that. I mean I'm not willing to... because he is a friend of mine, whether you think he's a lunatic or not. And I, I find it a little insulting that you would say those things about a, you know...

[00:40] Morgan: No I, I, sir! I find your games very insulting! You're playing games with me! You're, you're claiming stuff from years ago and taking words that I said, the figures of speech out of context and, and, and trying -

[00:51] Campbell: Right, and I understand, like I said and I'm not doing any of these things.

[00:56] Morgan: And we've spent the past several days to a week negotiating on something and to me it's a done deal (inaudible).

[01:04] Campbell: It hasn't been weeks. It's been one week ago, today, that you emailed me.

[01:10] Morgan: And it took that time to do a lot of research. I'm a very busy person, sir. I don't spend this much time with anybody unless it's a multi-million dollar deal. I personally love President Kennedy and I personally collect him. That's the only reason we've gone back and forth so many times.

Now with this, and again, copyright law, it's, it's a fact, if you want you can talk to my lawyer, I have to get something signed from someone that says I own the copyright. That's very simple to understand, otherwise I could have just PayPal'd you, like everything else we do. You know, we buy millions in stuff with eBay, and PayPal it, and I don't even get involved. My assistant does it. This is a specific thing. It's called the copyright. So then if he owns the copyright, I have to get it registered under my personal name. Me. Keya Morgan. Not the company. Not anybody else. That's the law. This way if I own the copyright -

[01:57] Campbell: Right. I, yeah -

[01:59] Morgan: And if you're not playing games. If he's the eccentric one responding to videos from years ago, and taking words out of context, and trying to use it against me, and is trying to renege on a deal and it's, I'm not really sure it's helping us right [unclear], and it sounds ridiculous. It sounds absolutely ridiculous.

We're saying that if he owns it, we're buying it. That's it. It's that simple. And if, And if you're not playing games and he's the one that's playing games then you could just pretend like we're anybody else and buy it from him and not have to deal with us. I mean it's that simple. Or you just wasted our time and it's a big joke and you know, you're selling it to somebody else for more money and that's what it's all about, otherwise -

[02:41] Campbell: I haven't. Yeah - I haven't - you, you are, um, you're getting a little worked up over this. I mean that's how I feel about -

[02:49] Morgan: Because I've wasted a lot of time on it, sir! I've wasted a lot of time. I've called multiple people. And I'm buying the other photos now. And now you're telling me that after we made a deal and have sent me an email and, and everything is fine and now all of sudden you're telling me why did you use the word blah blah blah and I mean what if he hears all the other stuff I says? Wait until he hears the rest of my interviews. I'm extremely colorful on the TV. That's the way they like it to be. Nobody likes boring people who just sit there and like blah blah blah. Nobody likes that! They call that media presence. Media presence. But what does that have to do -

[03:27] Campbell: Right. But there is a generation before us.You know, the generation even that Kennedy was in, that, ah um, that those people don't understand that type of thing. That's why the news was the way it was back then.

[03:39] Morgan: You're right! You're right! But you're also (laughs), President Kennedy... did you see Mimi Alford's interview on, on 20/20 and 60 Minutes? She was the press intern, President Kennedy's intern. She said on her first day of her internship she lost her virginity to President Kennedy, on Jacqui's bed, and she was a teenager.

[03:58] Campbell: Right. Right. I've read that years ago. I mean, several years ago, that-

[04:01] Morgan: And and that's why 1,000 different women and his own secret service agents, you know, told, told uhh… one another-

[04:08] Campbell: Right. And I understand all of these things. I said from around, people from President Kennedy's generation. I didn't say President Kennedy.

[04:15] Morgan: No. No. I know people from his generation. But, but anyway, anyway, so long story short, none of these things have anything to do (laughing) at all, uh... you know. With, with... if you've found someone who wants to buy it, and you want to, um, you know, break a deal that you've already agreed on, and we've spent all this time on, that's, that's, that's, you know, your decision. I find it highly ethical and highly immoral but if that's, that's something you want to do you can.

If he's really being really eccentric, then, then, you know, you have, he gives you permission to sell it to whoever you want on eBay. So, I mean, you know, let me know when you put it on, we'll buy it, and then, you know, and then, we'll get something from you that says we own the copyrights, you know. He'll give everything to you and then you legally own it. So, uh, but whoever buys it, I'm just letting you know, unless they're total idiots, uh, they're going to be (inaudible - sounds like "deducted"). And we're paying you a premium. You know, I mean, we're paying you a premium. I mean, I've bought a lot of these photos in like the $200-$300 range. I've never paid $750 for a single shot, uhh...

[05:27] Campbell: Right, so why would it be likely that another person would spend more on it, I mean, as far as what you were telling me.

[05:35] Morgan: No, I don't think anybody's going to spend more on it. No. I, I... I don't think anybody's going to spend more -

[05:43] Campbell: I mean, you've said multiple times that there's a possibility that there's a higher buyer out there and you're just, we're reneging on this because we've found someone that's willing to spend more on it.

[05:47] Morgan: So you're saying you already have someone?

[05:48] Campbell: No, I'm saying that's what you have accused me of, like, multiple times on this conversation.

[05:53] Morgan: No no no, I said if, I said, well hold... I've never been in a situation like this in my life. I've (inaudible) thousands of stuff, sir, including President Kennedy's personal photographer. Nobody's ever called me and said why did you, years ago, use the word orgasm on TV? That, that is ludicrous! I mean, do you see how ludicrous that is? That's not in the context of President Kennedy's assassination -

[06:15] Campbell: No. It was just over photos of his family, that's uh, that's where I think, photos of his children, photos of -

[06:23] Morgan: (inaudible)

[06:38] Campbell: Well I just, and also, something along the, I mean you've called Ron ludicrous now. You've called him all these other things and, I don't, I just don't see how this is a deal that needs to keep going on, I mean after all of these things that I've heard. uh, I don't -

[06:53] Morgan: (inaudible) you're the one playing games -

[06:55] Campbell: I'm not playing games, I just-

[06:56] Morgan: But you are playing games (inaudible), dumbest thing that I've ever heard in my life. It's a simple deal. I pay you. You give us this photo and you sign it. Deal. That's it. I mean, you sign it. (inaudible) and then you give us the photo. It's that simple. Bringing up my past interviews, you -

[07:15] Campbell: Well, and also, I mean, you've been throwing around these, all of these names and stuff all this time. I know President Bush, I know Laura, and I know Willie Nelson, I know, you know, and this -

[07:25] Morgan: I've met President Bush. I've met President Bush. And I have an award from Laura Bush, for preserving the White House. So, I mean -

[07:34] Campbell: Right. There's no problem there. I'm just saying, why are you throwing around all of these big names as if it's impressive somehow, I mean, in the matter?

[07:40] Morgan: No, no no, I, I, I, I threw around Kennedy names in this conversation. And I explained to you that his photographer- First of all nobody knows the names. Nobody even knows these people built in - but it sounds like you just want to do personal attacks and personal um... You know -

[07:55] Campbell: No, no, I just -

[07:57] Morgan: Everything we're talking about, sir, has nothing to do with -

[07:59] Campbell: Well, after you called Ron- you, you, you've said in the last conversation that Ron was nothing more than a hole in the wall and that you're a public icon and you've never heard of him and -

[08:09] Morgan: I didn't say I'm a public icon, I said I was a public figure. I didn't say icon. And that's because you told me he wants to wait two weeks when every single bank takes 24 hours. So when somebody tells me that they don't trust me enough that they want to wait two weeks.

And the White House trusts me. I have, you said, you know, Laura Bush. I have an award signed by her. Presented to me at the White House, for helping her preserve the White House.

[08:36] Campbell: Yeah, that's great.

[08:39] Morgan: If you're talking about trust and you're talking about trusting or not trusting someone. But you're just, you're just arguing with me about complete abstract sir.

[08:47] Campbell: Well, no, you just continue to push this matter and I mean I've already told you in an email and I've told you in the conversation multiple times that I'm pretty sure this is a done deal with him. I mean it's not me anymore at this point and you've asked me why and I told you and you get offended, and you attack me and saying I'm saying all of these things and I'm playing games, and I- hey, I'm not doing anything except being- I'm the middle man. I'm the middle man in this. And I don't appreciate the way I've been treated.

[09:14] Morgan: It's obvious- It's obvious you're playing games.

[09:17] Campbell: Oh well ok, well then the conversation is over, Mr. Morgan.

[09:21] Morgan: Ok, goodbye. You're crazy. You're crazy.

[09:23] Campbell: Thank you.

EXHIBIT B-2

Public-Access YouTube Page Screenshot

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.

Source Document

Public-access YouTube page for the Keya Morgan recording

Purpose

Screenshot showing the public YouTube page, URL, title, upload date, updated description, all-rights-reserved notice, and closed-caption copyright language.

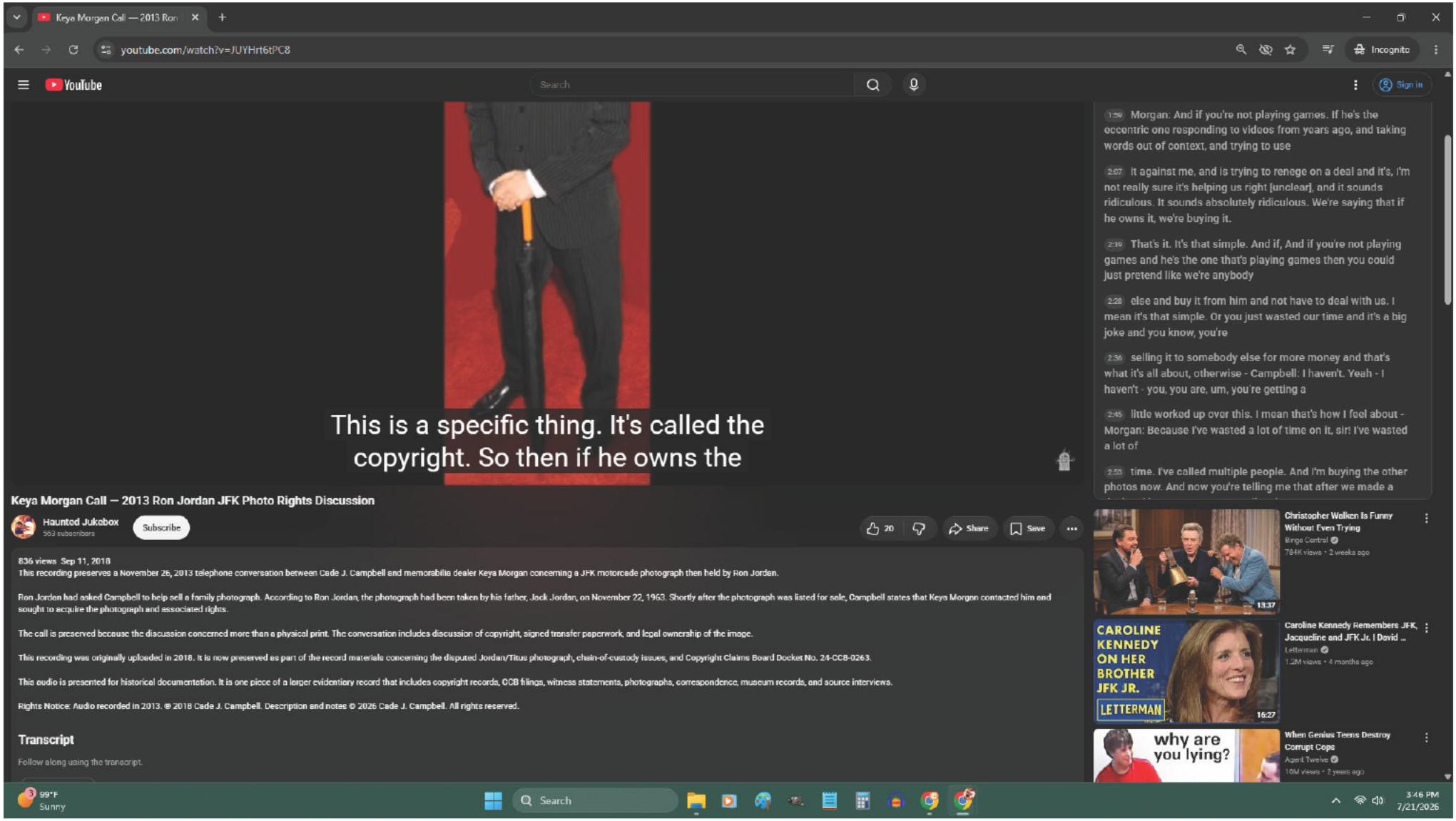


Exhibit B-2: Public-access YouTube page for "Keya Morgan Call - 2013 Ron Jordan JFK Photo Rights Discussion," located at https://www.youtube.com/watch?v=JUYHrt6tPC8. Screenshot shows the video title, original upload date ("Sep 11, 2018"), updated description identifying the recording date as November 26, 2013, the all-rights-reserved notice, and closed-caption text: "this is a specific thing. It's called the copyright."

EXHIBIT C

Prior CCB Exhibit Table Identifying Keya Morgan Exhibit 6 / 6A

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.

Source Document

CCB Doc. No. 025
Amended Claimant's Response to Respondent's Defenses Exhibits Table of Contents
Electronically filed May 13, 2025

Purpose

Shows that Exhibit 6 / 6A identified the Keya Morgan communication and audio-recorded phone call in the case materials.

Electronically Filed
Docket: 24-CCB-0263
Filing Date: 05/13/2025 05:01:36 PM EDT

Amended Claimant's Response to Respondent's Defenses
Exhibits Table of Contents
(Amended 04/10/2025 of Original CRTRD 04/02/2025)

Table of Contents for Exhibits

- **Exhibit 1 – Claimant's Copyright Registration** **(EXHIBITS; PAGE 02 of 1120)**
    - Copy of U.S. Copyright Registration No. VAu001163383 (January 17, 2014)
    - Correspondence with U.S. Copyright Office (Page 06 of 1120)
        - **Copyright Office emails.**
            - These provide direct confirmation from the U.S. Copyright Office that:
                a. The copyright registration process was completed.
                b. The Bill of Sale and Affidavit of Fact were accepted as proof of copyright transfer.
                c. Ron Jordan, as the sole heir, transferred all rights to Cade Campbell.
                d. The registration specialist acknowledged the legal validity of the transfer.
                e. The copyright certificate was issued to Cade Campbell.
- **Exhibit 2 – Claimant's Uncropped JFK Photo (Jack Jordan's Original)**

    (EXHIBITS; PAGE 16 of 1120)

    - Full-resolution scan of the original uncropped photograph
- **Exhibit 3 – The Museum's Cropped Slide (Alleged Titus Photo)**

    (EXHIBITS; PAGE 18 of 1120)

    - Comparison between the cropped slide and the uncropped original (Refer Exhibit 12).
    - Analysis of cropped-out details (yellow airport vehicle, Love Field mechanic, flag stars, pavement identical to other historical photos and footage at Love Field), showing that this is a cropped duplicate of the Jordan original.
    - Reference Exhibits 2, 3, 8 and 12

- **Exhibit 4** – **Affidavit of Fact of Ron Jordan** **(EXHIBITS; PAGE 22 of 1120)**
    - Sworn affidavit confirming Jack Jordan as the photographer
    - Statement on the history of the photograph's ownership and sale
- **Exhibit 5** – **Photograph Bill of Sale from Ron Jordan to Claimant** **(EXHIBITS; PAGE 26)**
    - Notarized document transferring ownership of the photograph
- **Exhibit 6** – **Keya Morgan Communication** **(EXHIBITS; PAGE 31)**
    - Emails & audio recorded conversation regarding Morgan's attempt to acquire rights in November 2013. (See Exhibit 6, recorded call between Keya Morgan & Claimant about Jordan Photo - Nov 2013")
    - Email communication to Ron Jordan from Client 11/25/2013.
- **Exhibit 7** – **Historical Images and Footage from Love Field (November 22, 1963)**

  (EXHIBITS; PAGE 56)
    - Images showing:
        - Yellow airport vehicle
        - Airport mechanics or Air Force Persons or Love Field Fireman - all wearing similar suits as seen on the man in the UL corner of the Jordan Photo, standing next to a yellow airport vehicle.
        - Boarding ramp stairs
        - Love Field's tarmac conditions being mostly dry pavement with water puddles in few areas.The pavement has dark tarmac and light gray parking lot pavement in the same area.
        - Love Field Tarmac Photos from 11/22/1963. You will see that by the time the plane had landed at approx. 11:38AM, the skies were blue and most of the water had dried up on the tarmac. (See Exhibit 7O.)
        - Close-up of UL corner of Jordan Photo - an airport personnel (U.S. Air Force personnel, airport mechanic or Love Field fireman) and a large yellow airport vehicle driver side tire, showing a rim that matches another photo shown from 1963 at Love Field (**see Exhibit 7G1, page 108 of 1120**).

Amended Exhibits Table of Contents

Exhibit No.	Description	Page No.
EXHIBIT 1	Claimant's Copyright Registration	002 of 1120
EXHIBIT 2	Claimant's Uncropped Jordan Photo	016 of 1120
EXHIBIT 3	Museum's Cropped Slide	018 of 1120
EXHIBIT 4	Affidavit of Fact of Ron Jordan	022 of 1120
EXHIBIT 5	Photograph Bill of Sale	026 of 1120
EXHIBIT 6	Keya Morgan Communication	031 of 1120
EXHIBIT 6A	Keya Morgan Audio Recorded Phone Call about Jordan Photo	N/A
EXHIBIT 7	Historical Images and Footage of Love Field	056 of 1120
EXHIBIT 7A	Air Force One on dry pavement, blue skies 11/22/1963	057 of 1120
EXHIBIT 7B	Love Field Airport Tarmac and Parking Lots Areas	060 of 1120
EXHIBIT 7C	Boarding Ramps at Love Field	076 of 1120
EXHIBIT 7D	Crowd at Love Field on 11.22.1963	079 of 1120
EXHIBIT 7E	Examples 1960s Air Force & Airplane Mechanic Uniforms	081 of 1120
EXHIBIT 7E1	1960s U.S. Air Force Uniforms	082 of 1120
EXHIBIT 7E2	1963 Airplane Mechanic Uniforms / Coveralls	085 of 1120
EXHIBIT 7F	Love Field Airport Mechanics	099 of 1120
EXHIBIT 7G	Love Field Yellow Airport Vehicles	102 of 1120
EXHIBIT 7G1	Love Field Vehicle with Matching Wheels to Jordan Photo	108 of 1120
EXHIBIT 7H	Love Field Fire Department	114 of 1120
EXHIBIT 7I	Powerline Cables at Love Field	120 of 1120
EXHIBIT 7J	Love Field, JFK stepping off plane onto Dry Tarmac	124 of 1120
EXHIBIT 7K	Continental Hangar at Love Field	129 of 1120

EXHIBIT D

April 3, 2025 Email Producing the Keya Morgan Recording to Respondent's Counsel

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.

Source Document

Email dated April 3, 2025, 1:15 PM

Purpose

Shows that the MP4 recording was produced to Respondent's counsel during discovery.

Gmail **Entertainment History LLC <entertainmenthistoryllc@gmail.com>**

Discovery Interrogatories and Exhibits 24-CCB-0263

Entertainment History LLC <entertainmenthistoryllc@gmail.com> Thu, Apr 3, 2025 at 1:15 PM
To: "Phipps, Charles" [redacted], "cc: Lindsay Calhoun (1315)" [redacted], "Foister, Kara" [redacted], "Mary Ellen Roy (1254)" [redacted], "Collins, Michael H." [redacted]

Please find attached a recorded phone call between myself and Keya Morgan in Nov. 2013 about the Jordan Photo.
[Quoted text hidden]

Keya Morgan Phone Call with Cade Campbell about Jordan Photo - Nov 2013.mp4
10429K

EXHIBIT E

Order Denying Request for Reconsideration

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.

Source Document

Order Denying Request for Reconsideration
Dated July 17, 2026
eCCB Docket Entry No. 61

Purpose

Complete order denying Claimant's Request for Reconsideration.

Cade J. Campbell	*v.*	Dallas County Historical Foundation d/b/a The Sixth Floor Museum at Dealey Plaza
CLAIMANT		**RESPONDENT**

ORDER DENYING REQUEST FOR RECONSIDERATION

Claimant Cade J. Campbell ("Claimant" or "Campbell") initiated this claim on September 6, 2024, alleging copyright infringement of a photograph of the Kennedy motorcade on the day of his assassination (the "Work") (Dkt. 1). On May 27, 2026, the Copyright Claims Board ("Board") issued the Final Determination in this proceeding, which found that Respondent Dallas County Historical Foundation d/b/a The Sixth Floor Museum at Dealey Plaza ("Respondent" or "the Museum") did not infringe the Work, and dismissed the claim with prejudice. (Dkt. 57). Campbell filed a request for reconsideration on June 26, 2026 ("Request") (Dkt. 58). The Board issued a docket note on June 26, 2026 (Dkt. 59) that, while the Museum could file a response by July 27, 2026, one was not necessary. Respondent filed its response to the Request on July 16, 2026. (Dkt. 60).

A request for reconsideration of a final determination must identify a clear error of law or fact that was material to the outcome, or a technical mistake. 17 U.S.C. § 1506(w); 37 C.F.R. §§ 230.1-230.2. Because the Request simply repeats the arguments made in Claimant's previous written testimony and fails to demonstrate that the CCB has made a clear error of law or material fact or a technical mistake in its determination, Claimant cannot meet his burden for reconsideration. Therefore, the Request is denied.

Campbell Cannot Prove by a Preponderance of the Evidence That He Owns the Work.

The Final Determination was not a close question of fact or law. All of the submissions suggested not only that Campbell could not prove ownership of the Work by a preponderance of the evidence, but that it was highly unlikely that the photograph in question was taken at Love Field by the now deceased father of the now deceased man who purportedly sold Campbell the copyright in the Work. Moreover, the evidence was overwhelming and highly credible that the Museum received the Work (as part of a series of chronological photographs) from the widow of the actual photographer of the Work.

The crux of the Request is that, of the many reasons the Board decided that Campbell did not meet his burden of proof and that the Museum's version of the facts was more credible, each reason, on its own, was flawed and did not prove that the Museum's story was true. In the Request, Campbell asserts the following: that third-party questioning of the Work's provenance before Campbell even obtained ownership was misread; the Board gave insufficient weight to the information and bill of sale from the person who purportedly sold Campbell the Work;

the Board gave too much weight to the fact that Campbell's print of the Work (he did not actually have the original negative of the Work) came far later than the timing of the motorcade and was smaller than the image held by the Museum; the Board gave too much credit to various aspects of the Museum's evidence; and, the Board too easily discounted his evidence that the photograph was taken at Love Field and the registration Campbell obtained in the Work.

The Request, however, misses the point. Any presumption afforded by Campbell's registration of the Work was easily overcome. The totality of the evidence was clearly in the Museum's favor and, more importantly, made it so that Campbell was a far cry from satisfying *his* burden of proof.

The Board's application of the law, supported by the facts, the Copyright Act, and judicial precedent, was not clearly erroneous. The Request does not identify any legal or factual error that would justify reconsideration of the Final Determination. Therefore, the Board denies the Request.

Copyright Claims Board

EXHIBIT F

Excerpt from Claimant's Request for Reconsideration

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.

Source Document

Claimant's Request for Reconsideration of Final Determination
Filed June 26, 2026
eCCB Docket Entry No. 58

Purpose

Shows that the Keya Morgan issue was raised before the Board denied reconsideration.

Electronically Filed
Docket: 24-CCB-0263
Document: 58
Filing Date: 06/26/2026 02:39:05 AM EDT

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

Proof of Delivery

I hereby certify that on Tuesday, July 21, 2026, I provided a true and correct copy of the Exhibit Packet - Claimant's Request for Review by the Register of Copyrights to the following:

Dallas County Historical Foundation AKA Sixth Floor Museum at Dealey Plaza, represented by Mary Ellen Roy, served via ESERVICE at maryellen.roy@phelps.com

Signed: /s/ Cade J Campbell