ENTERTAINMENT HISTORY, LLC

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September 5, 2024

Sent via E-Mail to MeganB@jfk.org

Megan P. Bryant
The Sixth Floor Museum at Dealey Plaza
JFK.org
411 Elm Street, Dallas, Tx 75202
214.747.6660

RE: Cease and Desist: JFK.org's Unauthorized Use of Copyrighted Image

Dear Megan P. Bryant,

I am writing to follow up on your previous letter regarding your museum's unauthorized use of my copyrighted image of President John F. Kennedy on your website, JFK.org. After reviewing your response dated 09/04/2024, I felt it necessary to provide additional information and clarification.

As I previously stated, my image is properly copyrighted with the Library of Congress, Registration Number: VAu001163383 and I also have a notarized "Affidavit of Fact" from Ron Jordan (1942-2021), the son and sole heir of the actual photographer of the image in question, Jack Jordan (1917-1998). I knew Ron Jordan well and have no reason to doubt his honesty.

The copyrighted image in question is also referred to as the "Jordan Photo" within this "Cease and Desist to JFK.org" and described as: Title: U.S. President John F. Kennedy (JFK) and First Lady, Jacqueline Kennedy, in the back seat, Texas Governor John Connally, and wife Nellie Connally (seated in middle section), William Robert Greer (driver), and Roy Herman Kellerman (front seat passenger) in the presidential limousine at Love Field Airport, Dallas, Texas. Copyright Claimant: Cade Campbell, Transfer: By written transfer of all rights, via sole heir of author. Date of Creation: 1963 Authorship on Application: Jack Jordan, 1917-1998; Domicile: United States; Citizenship: United States. Authorship: photograph(s) Rights and Permissions: Cade Jackson Campbell, 3821 Hagler Rd, Cleburne, TX, 76033, United States, (817) 648-1499, thelittlewhitehouse@rocketmail.com Copyright Note: C.O. correspondence. Names: Jordan, Jack, 1917-1998 Campbell, Cade The Library of Congress United States Copyright Office 101 Independence Ave., S.E. Washington, D.C. 20559-6000 202-707-3000

In contrast, **your "Gift Agreement" signed by Nancy Titus (10/30/2012) is NOT notarized**, and I question its validity.

Furthermore, I have discovered that:

A. - According to her obituary, Nancy Titus unfortunately passed away in April 2019 and *"**suffered from Alzheimer's disease for many years;** now she flies high, free at last from her earthly confusion and fears"*, making it highly questionable of the Sixth Floor Museum's ethics and morals, being unsure that Nancy Titus was actually of sound mind

and could have accurately verified the information provided to Stephen Fagin and Nicola Longford who signed the "Gift Agreement" one day before Nancy Titus, without notarizing said agreement.

B. - The "Gift Agreement" lacks signatures from Sally Dobbie, Jack Titus' daughter, who you mentioned was present at the signing on 10/30/2012. Jack Titus had 3 children and only one of his children was present at signing (Sally Dobbie) but she did NOT sign the "Gift Agreement", not even as a witness.

C. - Stephen Fagin, the associate curator, only scribbled an illegible signature (on 10/29/2012) but did not actually print his name on the non-notarized "Gift Agreement" document, as Fagin is only mentioned as the Recommender of the Acceptance of the *"gift"*. Executive curator was not present at the signing? Executive Director, Nicola Longford, signed this agreement as the Acceptor of the *"gift."*

D. - Stephen Fagin and Nicola Longford signed this document on 10/29/2012 (one day before Nancy Titus signed this document on 10/30/2012, however it is **not notarized**.) Without it being notarized I cannot even be certain of the date that this was signed nor can I verify that any of the signers were true?

E. - The Titus slide with the Jordan image you claim as part of the "Titus" collection does NOT match the sequence of Titus' other slides, nor the quality of my copyrighted Jordan image.

F. - The image you are using is clearly cropped and taken from a larger photo, likely one of Jack Jordan's original photos. Titus' slide is fuzzy/grainy and the Jordan image is uncropped and clear.

G. - The background of the Jordan image, including the cars (circled in red) facing the limousine, nor any of the people in the crowd are present in the other "Titus" slides.

H. - The street seen in Titus' slides is not seen in the Jordan image. Jordan's image is taken at the Love Field Airport, from a boarding ramp. The angle of the photo shows that it was not taken from a roof top as erroneously claimed and is apparent by comparing with Titus' other slides.

I. - It seems more than coincidental that this museum did not exhibit their image online until 2022 (according to the https://web.archive.org/ 's "Way Back Machine") not until after Ms. Nancy Titus' expiration in 2019. They also waited for Mr. Ron Jordan to expire in 2021 before displaying Jordan's image on their site. I have been monitoring the internet, off and on, for many years since I am the copyright owner, and have never seen JFK.org / Sixth Floor Museum mention said image until August 2024 when I discovered it online and immediately contacted JFK.org about their illegal use of my copyrighted image.

Mr. Titus must have owned the very first camera drone to be able to take all 5 of these slides in a sequence as you claim. I see absolutely no way he could have possibly taken ALL of these 5 slides in a sequence as you mentioned. Your questionable slide collection "by Titus" doesn't even show the same people in a crowd, nor do they show any of the vehicles facing the limousine as my copyrighted Jordan image shows. Your blurry slide is taken later (probably by Titus) and cropped from a larger clearer photo (Jordan's photo).

You have stated that your museum is the copyright holder however you do not have a copyright registration number. You do not have anything more than a poorly orchestrated "Gift Agreement" from a potentially senile woman, and it is not notarized, and the only witnesses to the signing are the acceptors, Stephen Fagin and Nicola Longford, who are workers for the Sixth Floor museum / JFK.org.

I own the original and my copyright is truth and it has been registered with the Library of Congress for over a decade. Mr. Titis may have taken the few photos that match one another but my Jordan image does NOT go in Titus' sequence of slides.

Jack Jordan worked at LTV (next door to Love Field airport) as head of LTV's materials department. He was there on Friday 11/22/1963, as he was every week, and he stepped up on a boarding ramp and took the image in question, right after he

physically touched the president's hand. This information can be found in Ron Jordan's signed "Affidavit of Fact" dated and notarized on 12/13/2013.

As you can clearly see from the angle of the Jordan image, it is not taken from a *roof top, as claimed,* however it was taken from an airplane boarding ramp by Jack Jordan at Love Field Airport.

Please see attached screenshot of my copyrighted Jordan image being displayed on *JFK.org.* See background, behind the limousine. Where are the cars (circled in red) in Titus' other slides? The stretch of road in Titus' photo sequence does NOT appear to be anything more than stretched to fit your misinformed perception of the truth. You are trying to rewrite the truth to fit your narrative, even if it means taking my copyrighted image hostage and telling me my copyright is invalid based on your poor excuse for documentation.

Titus' slide is clearly a cropped image. He likely took a poorly duplicated picture from the original Jordan photo and had it made into a new slide, cropping the original image. As you have previously noted, Mr. Titus was passing these around, likely illegally selling Mr. Jordan's image way back then.

I demand that you:

1. Immediately remove the image from your website and any other platforms under your control.
2. Provide a written proposal for compensation for the unauthorized use of my image, including any licensing fees you may have received from third parties.
3. Provide documentation of any licensing agreements or uses of my image.

Failure to comply with this cease and desist letter may result in further legal action.

Please find attached the following documents:

- Nancy Titus' obituary
- Screenshot of the image in question, showing the background and cars (circled in red)
- Notarized Affidavit of Fact from Ron Jordan.

I look forward to your prompt response and resolution.

Regards,

</s> Cade J. Campbell

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