

May 22, 1996

HAND DELIVERED

The Honorable Frank W. Hunger  
Assistant Attorney General for the Civil Division  
United States Department of Justice  
10th and Constitution Avenue, N.W. Room 3143  
Washington, D.C. 20530

Re: Assassination Records Review Board Subpoena Request No. 6 (Robert Groden)

Dear Mr. Assistant Attorney General:

The Assassination Records Review Board requests that the Department of Justice issue a subpoena duces tecum to:

Mr. Robert Groden  
212 Emily Lane  
Boothwyn, Pennsylvania 19061

Mr. Groden worked as a photographic technician/consultant for the House Select Committee on Assassinations (HSCA) in the late 1970s. In the years since Mr. Groden worked with the HSCA, allegations have surfaced that Groden has possession of photographs and films which he obtained through undetermined circumstances during the time that he was a consultant for the HSCA. We would like to schedule his deposition for July 1, 1996, at the Federal Courthouse in Philadelphia.

Please do not hesitate to contact either me or our General Counsel, T. Jeremy Gunn, if we may be of any assistance.

Sincerely,

David G. Marwell  
Executive Director

cc: Art Goldberg, Esq.

SUBPOENA DUCES TECUM  
FOR THE PRODUCTION OF DOCUMENTS  
AND APPEARANCE FOR TESTIMONY  
BEFORE THE ASSASSINATION RECORDS REVIEW BOARD

TO: Robert Groden  
212 Emily Lane  
Boothwyn, Pennsylvania 19061

YOU ARE HEREBY REQUIRED AND DIRECTED, PURSUANT TO 44 U.S.C. § 2107, TO APPEAR BEFORE:

T. Jeremy Gunn, General Counsel of the Assassination Records Review Board, at the United States District Court, Eastern District of Pennsylvania, Room 3308, Independence Mall West, 601 Market Street, Philadelphia, Pennsylvania 19106, on the 1st day of July, 1996 at 10:00 a.m., and at the same time each day thereafter until complete, or at such other time and place to which the parties shall mutually agree, to testify under oath regarding records relating to assassination of President John F. Kennedy.

YOU ARE HEREBY REQUIRED to bring with you, to produce and to make available for inspection and copying or reproduction at said time and place all books, records, correspondence, electronic recordings, photographs, motion pictures, and documents that are in your possession, custody, or control and which are described in Attachment A hereto.

The production of documentary material in response to this subpoena must be made under a sworn certificate, in the form set forth, by the person to whom this subpoena is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production.

Inquiries concerning compliance with this subpoena should be directed to T. Jeremy Gunn, General Counsel, Assassination Records Review Board, 600 E Street, N.W., 2nd Floor, Washington, D.C. 20530 (202) 724-0088.

ISSUED AT \_\_\_\_\_

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 199\_\_\_\_\_

By: \_\_\_\_\_

\_\_\_\_\_  
FRANK W. HUNGER

Assistant Attorney General

## ATTACHMENT A

1. "Camera original" should be understood in the broadest reasonable sense and includes any photographic product (including, without limitation, still negatives, still positive transparencies, and motion picture master positives or master negatives) created by exposing unused film to light while inside the camera, or in the case of a videotape, the master recording created directly from the original electronic feed from the video camera device.
2. "Copies" should be understood in the broadest reasonable sense and includes any reproductions of camera original still or motion picture films; any altered, stabilized, re-framed, step-framed, enlarged or enhanced reproductions of camera originals or of other copies; any copy of a master negative or master positive; any generational copies of videotapes or audiotapes; any electronic or digitally stored reproduction of an original film or videotape image; and any portion of any of the aforementioned types of copies or reproductions.
3. "First generation copy" means any photographic reproduction made directly from a camera original positive or negative film, or any part thereof.
4. "Print" refers primarily to any photographic image, or any part thereof, made on photographic paper, using laboratory equipment, directly from a negative or positive transparency; but may also refer to an "instant-image" photograph produced in a Polaroid-type camera (or any part thereof) which developed itself *in situ* without being processed at a lab from a negative or positive transparency.
5. "Rotoscoping" or "Grodenscoping" in this context includes any process which stabilizes, re-frames, step-frames, enlarges, or enhances a motion picture film in order to make it easier to view.
6. "And" and "or" should be understood in the broadest reasonable sense and should be construed inclusively in favor of producing the largest number of records.

## DOCUMENTS AND PHOTOGRAPHS

1. YOU ARE HEREBY REQUIRED to bring all camera original black-and-white and color negatives, color positive transparencies, motion picture films (to include master positives and master negatives), videotapes, and any other camera original photographic materials (as well as any original audio recordings) in your possession, control, or custody that were recorded in Dallas, Texas on November 22, 1963, or which were recorded at the autopsy or the embalming of President John F. Kennedy. (Additionally, you are required to bring with you any first generation copy of the motion picture film of President Kennedy's assassination taken on November 22, 1963, by Abraham Zapruder.)
2. YOU ARE HEREBY REQUIRED to bring all photographic prints (regardless of generation or quality), and all copies of black-and-white and color negatives, color positive transparencies, motion picture films (to include copy positives and copy negatives), videotapes, audiotapes, and electronic or digital recordings that relate to the assassination of President John F. Kennedy. (Copies of motion picture films include any versions of the Zapruder film or other assassination motion picture films in your possession, control, or custody which have been "rotoscoped," "Grodenscoped," or otherwise enhanced or altered in any way, and any copies of the Zapruder film which are beyond first-generation copies.)

You are not required to bring with you any commercially published books, articles, videotapes, or audiotapes (or commercially available research materials) related to the assassination.

3. YOU ARE HEREBY REQUIRED to bring all documents and records that describe, in any way, your obtaining, using, copying, or photographing any materials described in paragraphs 1 and 2 above, including, without limitation, permission to reproduce photographs or to acquire photographs.