

**Complete Transcript of the Martin Luther King, Jr.  
Assassination Conspiracy Trial**

**Volume 7**

24 November 1999

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IN THE CIRCUIT COURT OF SHELBY COUNTY,  
TENNESSEE FOR THE THIRTIETH JUDICIAL  
DISTRICT AT MEMPHIS

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CORETTA SCOTT KING, MARTIN  
LUTHER KING, III, BERNICE KING,  
DEXTER SCOTT KING and YOLANDA KING,  
Plaintiffs,

Vs. Case No. 97242-4 T.D

LOYD JOWERS, and OTHER UNKNOWN  
CO-CONSPIRATORS,  
Defendants.

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BE IT REMEMBERED that the  
above-captioned cause came on for Hearing on this, the 24th day of November,  
1999, in the above Court, before the Honorable James E. Swearngen, Judge  
presiding, when and where the following excerpt of proceedings were had, to wit:

Volume VII

DANIEL, DILLINGER, DOMINSKI, RICHBERGER, WEATHERFORD  
COURT REPORTERS

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**PROCEEDINGS**

**THE COURT:** Bring the jury out.

(Whereupon, the jury enters the courtroom.)

**THE COURT:** Good morning, ladies and gentlemen.

Mr. Pepper, are you ready to go?

**DR. PEPPER:** Thank you, Your Honor. Your Honor, the plaintiffs call Mr. Jack Saltman.

**JACK SALTMAN,**

having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY DR. PEPPER:

**Q.** Good morning, Mr. Saltman.

**A.** Morning.

**Q.** Thank you very much for coming here this morning on this long flight from England in light of your back surgery. We are very grateful that you have made this trip. Would you state for the record, please, your full name and address.

**A.** My name is Jack Saltman,

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S-A-L-T-M-A-N, and my address is Morwenna. That's M-O-R-W-E-N-N-A, the Causeway Claygate in the county of Surrey in England.

**Q.** Mr. Saltman, can you tell us what has been your – your profession over the years?

**A.** I started off as a print journalist in newspapers. I went into television in 1961 and became a television producer, director, and, finally, editor of major programs in Great Britain for thirty-five years.

**Q.** And which television companies have you worked with in that capacity?

**A.** My two main employers were the *BBC* I worked for for sixteen years and a company called *Thames*, that's T-H-A-M-E-S, as the River Thames, for – also for sixteen years, but I also did coproductions with a number of American companies

like *Home Box Office* and *ABC* television.

**Q.** In actual fact, when did you have the first contact with the case of the assassination of Martin Luther King?

**A.** 1978 to celebrate – celebrate is the

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wrong word – to note the tenth anniversary of the assassination, I was asked to produce and direct a one-hour documentary for *BBC* television.

**Q.** And was that shown in England?

**A.** That was shown in Great Britain and sold to a number of other countries. Although, I'm not sure whether or not it played in America.

**Q.** Right. And at that point in time, did you come to Memphis to work on that production?

**A.** Yes, I did. I spent four or five days in Memphis. That's when James Earl Ray was in the Brushy Mountain Penitentiary. We saw him there, and I came to Memphis and then various other places. We went to New York and saw the former Attorney General and so on.

**Q.** All right. So at that time now, many years ago, over twenty years ago, you began to familiarize yourself with this case and the facts surrounding it?

**A.** Yes, as I do – or as I did, I'm

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retired now – as I did with all major productions. I did a lot of reading so I read all the literature that was then available, and prior to doing mild research, we had two researchers working on the ground, and a lot of effort was put into the story to try to get the facts as right as we possibly could.

**Q.** Right. Was there a time then some years later that you once again became

involved in this case?

**A.** Yes. In 1990, I think it was. An idea had been put forward to my company, *Thames Television*, that following a program I produced – coproduced for *Home Box Office* in America and in Britain on the Trial of Kurt Waldheim, the former secretary general of the United Nations. We held a trial for our trial on television, and following that, as a sort of example of what we could do, and I was approached with the view to making the trial of James Earl Ray.

**Q.** And would you describe how that type of trial – documentary trial format works,

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both in the case of the Waldheim trial and the case of the James Earl Ray trial.

**A.** With enormous difficulty and colossal headaches, and as you well imagine, having to work with an awful lot of lawyers who don't necessarily agree. And the first problem, obviously, is to try and get a format that is legitimate because this is not what I regard as cheap and nasty television.

The trial of James Earl Ray took a year and a quarter in the making and cost around about three million dollars. And we went to endless trouble to try and get everybody who was factually available, retired FBI agents, witnesses.

This was not a television drama. This was reality insofar as we recorded everything over ten days, and we finished up with eighty, ninety hours of material. It was then with the agreement of both attorneys, we then tried to balance as a fair representation of all the evidence.

The judge was a real judge. He had retired. He had been a federal judge in New

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York, and we had agreed that we would use Tennessee law. The only concessions we made to television as such was plainly in a program that was scheduled to run for four hours.

We couldn't have openings speeches, for example, running two hours and forty

minutes each. So we had to have some rules of engagement, as it were. For the rest, we stuck religiously. In both cases, the quality of the attorneys and the judges in both programs, both Waldheim and James Earl Ray, reflected the serious nature of what we did.

In the Waldheim program, we had the former British Attorney General, Lord Ralenson (phonetic). We had Alan Ryan, who was the chief prosecutor for the Office of Special Investigation in Washington as a prosecutor.

This was as serious as you could get on television. It must be set at four hours. It took a lot of effort on the part of the audience to watch it and follow it

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because no concessions were made to shortcuts.

**Q.** All right. And these trials and this trial of James Earl Ray was tried over many days; is that correct?

**A.** Yes. They were both recorded. My principle was to let the judge run the day in exactly the same way as His Honor will run today. My idea was that the cameras would always be on the outside looking in. We would never stop and say "take two" or anything silly like that.

The idea was we would run continuously as long as the judge wanted the court to be in session. So we ran both cases for something like ten or twelve days in the Waldheim case; twelve – seven, eight hours days. We had fifty-odd witnesses two times.

**Q.** And in both cases, there was no script at all, was there?

**A.** There was no script, only a running order of the witnesses that their respective attorneys chose to call that day. The entire script for the day was about half a page of

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A-4, which really just said these are the potential witnesses to be called. That's all.

**Q.** And the juries were chosen according to usual jury selection procedures?

**A.** To get a jury, I think my total bill was sixty-four thousand dollars. That's a good question. I had employed a company to send them – first of all, I got three cities agreed between both attorneys that they thought they were fair cities to attract jurors from.

For example, New York was regarded as too liberal a state so that was refused by the prosecution, and we sent these private detectives to select or to choose.

We finished up interviewing – I think there was twelve hundred and something jurors. Out of which, we came down to a hundred and something, which, together with the two attorneys, we then played videotapes of them answering the voir dire questions.

At the end of which, we tried to then balance male, female and to get an

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ethnic mix as well so that it looked fair as well as being fair, but insofar as we could, that was as fair a jury as I think it was possible to get.

**Q.** All right. And in the case of the trial of James Earl Ray, that was aired both in the United States and in United Kingdom?

**A.** Yes, it was. And in thirty-four other countries as well, I think.

**Q.** And when was it shown?

**A.** It was shown on the anniversary of the assassination, the twenty-fifth anniversary, April the 4th, 1993.

**Q.** All right. And do you recall the verdict of the jury in that case?

**A.** The jury were unanimous. The jury sat for – I think it was seventeen hours, and we had two requests for further information, which the judge and I saw sitting outside the jury room, and in the end, they unanimously found James Earl Ray not guilty of the murder.

**Q.** Now, Mr. Saltman, moving on, as a result of this experience and your previous

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work in the case, did you develop an ongoing interest as to the facts and the details of this assassination?

**A.** Yes, sir. As I said, the program took fifteen months from the start, my first trip over here to transmission, by which time, I had got fairly deeply involved with a number of the people peripheral to the case.

And, yes, I was on the point of retirement anyway so I had some time on my hands, and in a way, the story also chased me because people knew that I produced this mega program, and people then came to me with different angles or new angles, and it certainly – the program itself, somebody said it shook a few trees, and one or two coconuts fell out.

**Q.** All right. So then did you – because of all of this, did you begin your own independent investigation of this case?

**A.** Together with an associate, who without stating, lived over here in Memphis. We did follow a number of leads, yes, and it cost me quite a lot of money pursuing leads

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for no other reason than I was desperate to get to what I believed was the truth.

**Q.** Right. This section of the plaintiffs' case, Mr. Saltman, deals with the issue of the existence of a person called Raul. Did that individual become a focus of some of your work?

**A.** That was the sort of second step, second major step. We – we – Raul, of course, was a name that had first been broadcast, as it were, in the days when James Earl Ray had been arrested in London, and the name Raul has continued to be part of the – of the dialogue of this case.

When, as a result of the program, I was approached through an intermediary to meet someone who claimed to have known "the" Raul. I was very interested, and I flew over to meet them.

**Q.** And did you have a – a conversation and a discussion with a source who claimed acquaintanceship with Raul?

**A.** Yes. I had a number of conversations with someone who claimed that she had known

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Raul in the 1960's, yes.

**Q.** All right. And where did that lead you?

**A.** It led in various directions. It lead, first of all, as a result of the work of my associate, to getting a photograph of a man, or at least a photocopy of a photograph, of a man we believed was the said Raul, and it also led me to New York state.

**Q.** Before you went on that path, was this source of yours – her name has come up in Court – Ms. Glenda Grabo. Was this source of yours not steering you towards Houston, Texas?

**A.** Yes. She claimed that her friendship with Raul had all taken place in Houston, and her story was so extraordinary that when I first heard it, I'd have to say that I was profoundly skeptical, but, yes, we did go to Houston, and there was only parts of the story that I could get corroboration on, but what I found interesting were that the parts of the story that I could corroborate were all corroborated, and, plainly, if you find

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as any journalist that if someone – the bits of the story you can check turn out to be accurate, it leads you to lend more credibility to the rest of the story. So she gained in credence.

Can I also just say one other thing? This lady – this lady is a very uneducated lady. She left school when she was very young. She had a horrendous life of abuse when she was young by her father and uncle. She would forget things. She's under medication.

And I asked her if she would make notes of things that struck her because I was perhaps coming over every three or four months. And I said if – perhaps you'd be kind enough to make notes of things that strike you.

She took this to mean that I wanted her to write her life story, and in what I can only describe as a sort of literary equivalent of Grandma Moses, she wrote her life story, and this life story was quite extraordinary because it is – it's

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semi-literate. It's badly spelled, but it tells of her life story.

The relevant bits are a tiny, tiny part of this, and, again, for me, that led to an enormous amount of credibility because here's a woman who really was not used to doing anything remotely like this who had gone to this much trouble to tell her whole story, for which these key bits were only a tiny part.

**Q.** That's interesting. And she sent this to you?

**A.** She sent me – she gave me the – yes. It was written in four thick exercise books that were two sided. It was – it was some work just to read it.

**Q.** When you went to Houston, did you at one point or another speak with a former federal judge who had some knowledge of some of the events in which this lady spoke?

**A.** I think he was a state judge rather than a federal judge, but I stand to be corrected on that.

I had been given his name through a

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contact of a contact and only managed to get hold of him when we were at the airport waiting to fly back to Little Rock, and then drive to Memphis, and I rang him up on the off chance and said – asked him if he knew anything about a man called Raul, and he came back with a whole raft of material which astounded me because I

gave him no prompting at all other than to ask him if he knew anything about a man called Raul who had been, as he were, moving around in Houston in the 1960's.

He said that he, as a young attorney, had defected a number of drug – gun runners, I'm sorry, gun runners, and that it was known – the name Raul came up quite frequently as the, quote, Mr. Big, of the gun runners.

He said, I never met him, but he was quite well known. It was also alleged, he said, that he had been involved with a federal agency in the illicit shipping of arms to the Somoza Regime in Nicaragua.

**Q.** And did that tend to corroborate

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anything that the witness, Ms. Grabo, had told you?

**A.** Well, Ms. Grabo had told me that she had acted as a driver for Raul and for his cousin or uncle, Amorro (phonetic), and that he had – she had driven down to the dock side in Houston. She had been given photographs of the guards on the gates, and only if certain guards were on duty did she then drive in.

And at the bottom of the gang plank of a certain designated ship, there were wooden boxes which she subsequently discovered contained disassembled guns. Not small guns like pistols, as she put it, but larger caliber weaponry.

And it's plainly fitted in with what we had also discovered, that this same Raul that we had met, having seen his naturalization papers – not his papers, but his application – we knew that he had been working in an armor factory in Portugal – in Lisbon, capital of Portugal – prior to seeking American naturalization, and I

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believe there was an FBI note on the papers that suggested it was known that he had been sending disassembled guns out of Portugal at this time.

He was supposedly a mechanic, but I think his papers said he was actually a clerk in charge of the paperwork which enabled him to do this.

**Q.** Did you eventually meet with this judge in Houston?

**A.** Yes, I did.

**Q.** And did he face-to-face confirm to you these details?

**A.** He confirmed the details to me. I'll tell you the whole story. I was somewhat disappointed because this is not a case that you meet upper middle-class people all the time.

Somebody once said to me in litigation you tend not to meet too many upper-class people. This is a case of an awful lot of people whose words are extremely dubious.

I thought with this judge we had got

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a wonderful, absolutely bona fide figure. Now, undoubtedly, he wasn't happy. He was very, very well respected. He was very well educated, and I think for twelve or thirteen years, he'd been a judge of considerable repute.

I believe personal circumstances have changed, and I think his career had taken a very, very steep downward turn. He was no longer judging. He was earning a living as an attorney, and was – he corroborated everything he said to me on the phone.

He was not able to give me any solid leads that I could follow up. He gave me a lot of names, but they were all people who either moved off or gone away. Despite many, many hours of trying to find people on the phone, I never did.

I was never able to corroborate anything that he said other than what he said that corroborated what Glenda Grabo said.

**Q.** Did you then at some point meet with a former associate of James Earl Ray's last

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attorney, Percy Foreman?

**A.** Yes, I did. I went to the company, which is still called Foreman DeGarren. The ghost of Percy Foreman hangs large over the company, big portraits and photographs of him all around the offices, and I met DeGarren there, yes.

**Q.** And was a part of the information that you had received earlier an indication of a connection between Percy Foreman and Ms. Grabo at some point in time?

**A.** Ms. Grabo had said – she had told me as part of her statement that her husband, Roy, his brother was on a murder charge and that she had been told that Percy Foreman was the top man in the business and had gone along to see him.

She said that he had said he would charge her five thousand dollars, but that he would give her three thousand dollars back if she were to work for him. She said, I paint houses; what is that going to be – what use is that going to be to an attorney. He said, well, I want you to do some filing.

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I gathered the filing was of a more sexual nature, and this was acknowledged by Mr. DeGarren and that that's really what she was asked to do. She never got the money.

However, when she told Raul – according to her story, when she told Raul that she was working for Percy Foreman, he apparently lost his temper, and there were furious words between him and Percy Foreman.

Foreman then allegedly rang up Glenda Grabo and said, your life is in danger. Now, she claimed by that statement – she was driving her car on one occasion, and her brakes had total failure, and she was very lucky to escape with her life, and when she got this warning that her life was in danger, she sold up her house in Houston and moved to where she lives now.

**Q.** Did you at one point obtain a drawing of Percy Foreman that he had autographed for Ms. Grabo?

**A.** Yes. Ms. Grabo gave me – it was a cartoon of Percy Foreman, and he had inscribed it to her in his own handwriting,

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and Michael DeGarren, now the senior partner at the company, confirmed that that was Percy Foreman's handwriting, and that it was exactly the sort of thing that he did with these little bimbos. I don't know what you call them. That is the – that is the drawing.

**Q.** That is the – that is a copy of the drawing?

**A.** Yeah.

**Q.** And is that the signature that was confirmed by Attorney DeGarren?

**A.** Yes, it is.

**DR. PEPPER:** Okay. Plaintiffs move admission of this drawing.

(Whereupon, a document was marked as Exhibit 14.)

**Q.** Did you undertake any other investigative acts in Houston that made you more – more comfortable with Ms. Grabo's story?

**A.** We found where the alleged – the guns were brought to a house on the dock side there, and we had it pointed out to us where

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these guns were allegedly assembled.

I also went – I tried to find out about his – his cousin, Amorro, and I went to the Seamen's Union and discovered that – that he was a retired seaman and that he had about three years pension that had accumulated because it hadn't been claimed, and they had no forwarding address.

I found a man – his cousin or uncle, I'm not sure which, had been in a hospital, and I found him and collected him from the hospital, and he had lived with this man for a few weeks and then had gone to his sister or niece in Brazil, and I got the address in Brazil from him.

I wrote and phoned the lady in Brazil and was told that Amorro had died, so I was then able to let the Seamen's Union know that the pension that had accumulated

should go to his estate, or there was no point in paying it anymore.

But I did discover to my satisfaction there was an Amorro who did exist, again, consistent with everything

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Glenda Grabo had said. So this together with the elements and various little pieces began to build in my mind a conviction that a lot of what Glenda Grabo said was true, even though she is a most unlikely source, it must be said.

**Q.** Though we're not using the last name of the family involved here, let me show you – it is true, is it, that this Amorro had the same last name as Raul?

**A.** Yes, he did.

**Q.** Let me show you a photograph and ask if you obtained – at some point if you obtained this photograph of the relative of Raul?

**A.** I obtained four or five photographs, and I think that was one of them. I have to say it's so long since I looked at them, but I – but that certainly is him.

**DR. PEPPER:** That's fine.

Plaintiffs move admission of this photograph.

**THE COURT:** All right, sir.

(Whereupon, a document was marked as

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Exhibit 15.)

**Q.** Now, in the continuation of your work, did you at some time, from a source, obtain a photograph of Raul himself?

**A.** Yes, we did. A contemporaneous photograph or an old photograph?

**Q.** A photograph of any nature or any type.

**A.** Well, we obtained a photograph that I believe was the one on his naturalization papers, so that would have been sixty – sixty-four was it?

**Q.** Sixty-seven, I think.

**A.** Sixty-seven is what it was. I'm sorry. With age, my memory is beginning – we got that, and then we – having got his address, we then got some contemporaneous photographs of him.

**Q.** Right. And when you obtained this photograph, this naturalization photograph, immigration naturalization photograph, did you also obtain information about him? A kind of report about who he is and where he came from and that –

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**A.** Yes. It had on his original home in Lisbon. It had on the date of his passport, the number of his passport. It had on his new social security number and the date he was naturalized, his then address, and then it had – attached to it also was this FBI comment that it was known that he was shipping arms out of Portugal when he was there.

**Q.** All right. Did you subsequently learn of a place of employment that was attributed to him?

**A.** Yes. I was subsequently told where he was alleged to have worked, yes.

**Q.** Do you recall where that was?

**A.** It was a motor company, but I have to say I cannot remember.

**Q.** I'm going to show you – at what point did you and or your associates put together this immigration naturalization photograph into a spread of photographs that would be available to show to various witnesses?

**A.** You're asking me for a date?

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**Q.** Not asking for dates. I'm saying did you –

**A.** Oh, yes. Sorry. At that state, yes, we did. What – with having obtained the immigration photograph, what we then did was we got five other similar type photographs, and we made a spread of six photographs which I'm told was the sort of thing the police would do in this sort of a situation, and then we used that spread to offer it to witnesses to get them to identify the one they thought was the said Raul.

**Q.** Right. Would you take a look at this spread and tell us if this is the spread that you put together.

**A.** Yes.

**Q.** And, secondly, would you identify the immigration naturalization photograph that you received, do you recall?

**A.** Yes. It's the – I identify the spread as being the one I showed. Featured there is Carlos Marcello and a lawyer who went to jail for a couple years for helping Mr. Hoffa, but the actual photograph of Raul

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is the middle one on the right-hand side. That one there, yes.

**Q.** You're indicating it's this photograph?

**A.** That's right.

**Q.** All right. And did you show that spread to various people who had information about this case?

**A.** Yes. I think I showed it to four or five people who were relevant.

**Q.** At one point did a former lawyer of – attorney representing James Earl Ray, representing him around the time of the select committee hearings – did this attorney happen to see the photograph you've identified?

**A.** It was complete happen chance. I had been to the prison in Nashville to get James Earl Ray to pick out – to pick out the face he said was Raul, and I come back

to my associate's house, and there were a number of photographs on the table. Not just that photograph, but a number of different photographs, some were the contemporaneous

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ones, various odd photographs we had. I had taken a lot of photographs where the gentleman lived.

And this attorney picked that particular photograph up, totally unsolicited, and we were actually going out with her partner for a social evening, and she picked the photograph up and said, I saw this photograph in 1978.

And it was particularly resonate because she didn't say, I saw that person; she said, I saw that photograph in 1978, and I was absolutely astonished because here was a direct link of that particular photograph and that person, so it wasn't just any Raul. This was very specifically "the" Raul.

And I said, what happened, and she said, well, there was a name written on the back of it, and they checked that out, and it turned out to be policeman and had no relevance to the photograph. And I said, well, did you pursue who the photograph was of.

She had been shown the photograph

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by, I think, house investigators who were looking into the house assassination's committee investigation that was going on at that time, and she said she was shown the photograph by one of the investigators, and they had a copy of it in the office.

And I said, did you pursue it, and she said, at that time we had no money backing us at all. James Earl Ray obviously was in no position to pay, and we just did not have the money to hire private investigators to go checking so, no.

Why it particularly resonated with me was because when I went into the prison with a – what you call it – a notary to try and get James to make a statement about, you know, who he thought was Raul. As well as picking that person up, he said that

photograph was around in 1978. I was shown it then by the house investigators.

Now, these are two people completely disparate, completely separate, no possible contact at all, one in Memphis, one in a prison in Nashville who both identified not

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just the person, but the specific photograph, mug shot, and I have to say that I found that very convincing.

**Q.** Yes, indeed. You showed this photograph to James Earl Ray in a prison cell. Did you show him the individual photograph, or did you show it to him in the form of a spread?

**A.** No. Very specifically, I showed it to him as a spread with the notary as a witness. James Earl Ray had been under instructions from his attorney not to sign anything, which made my life a little bit difficult. But what I did, I – the prison authorities allowed me to take a tape recorder in with me, and I got James – and I still have that tape – to identify clearly on tape that that photograph, the one I identified, was the Raul that he met in the Neptune Bar in Canada and subsequently drove a car for and gave the rifle, the .30-06 rifle, to in Birmingham, Alabama.

And I have that tape recording still, but I also then got the notary who

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witnessed this to go to another public notary and swear an affidavit to the effect of what he had seen and heard – that James Earl Ray, in his presence, had identified that particular photograph.

**Q.** I see. Moving on then, did you at some point having accumulated this information, endeavor to contact Raul?

**A.** Yes, I did.

**Q.** And did you speak with him on the telephone?

**A.** Initially, I did. I rang him from my home in England, and as luck would have it, I

picked a bad day. It was his daughter's wedding day. And I said that I had met his cousin in England because his cousin was a merchant seaman and obviously traveled the world as a merchant seaman, and I said that I met his cousin, which was not totally true, I'm afraid.

But I said that I had met his cousin and I was trying to contact Amorro, and he said, yeah – well, I can't remember the words, and I wouldn't want to mislead

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anybody. I can't remember the words. This was a long time ago.

And he – but he left me no doubt at all that what he was acknowledging – that he had a relation with Amorro, who was in Houston, and he further acknowledged that he had been in Houston himself.

He then said, I'm sorry, I can't – there was pandemonium in the background. There was an awful lot of very excited voices, which is not surprising being the bride's house just before the wedding, and he said, you know, can you possibly contact me again, and I rang off.

**Q.** Right. Did you attempt to contact him again?

**A.** Some months later. I can't remember how long. Some months later, I went around to his house in New York state and knocked on the door, and the door – if I can explain – was – there was a wrought iron grille type door, and then there was a sort of mesh glass door, a glass door with a mesh on it. They could obviously see out, but all I could see

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was a sort of dark interior of the house with shapes. That's all I could see.

First of all, a lady came to behind the door and started hailing what I can only imagine was abuse. It was in Portuguese. It sounded like abuse. It was in Portuguese, and my Portuguese is nil.

Then she was sort of pushed aside by someone I assume to be the daughter who

got married. She was dressed in white, and I could see her white outline, and she spoke perfect English, and she told me to go away, what did I want, and I was being a nuisance. I explained that I was an English journalist, that I had had various allegations made to me about her father, and all I wanted to do was to sit down with her father. If he wanted, by all means, to bring an attorney along and sit down with him and his attorney so I could put the points to him that I had had made to me and get his answers.

And I said that if I was convinced at the end of that conversation that it was

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the wrong Raul and he had nothing at all to do with this that I would leave them alone and never get anywhere near them again.

She told me that her father was indisposed. Now, I knew that was untrue because I could see vaguely a figure of a male, and I could hear loud state whispers, and I was fairly sure that was Raul.

In the meantime, the mother had come around to a side window and was taking photographs of me through the side window.

For what reason, I have no idea. And the daughter kept saying that I wasn't doing my job properly, and I said, well, I'm trying to do my job properly by checking the facts because that's what I do.

I don't go dashing in, you know. We don't sort of get a story today and print it tomorrow. My protos take a year in gestation. So about the same time, it's not anything really.

And then, you know, I said I was trying to check my facts, and all I wanted to do was to speak to her father. She didn't

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want to know about this, said her father was indisposed.

Then I said, would you have a look at this photograph and confirm – or with words to

this effect – that this photograph is your father, and she said something to the effect that – that anybody could get naturalization photographs, and if I could get that, then I could get all the other answers to what I was chasing anyway and not to bother them, something to that effect.

She left me no doubt at all that she had positively identified – I didn't show her the spread. I showed her an enlargement of that photograph.

**Q.** You just showed her a single photograph?

**A.** Yes. Yes. There was no point in asking her to pick out father because I now believe that was her father. That seemed to be an academic exercise, so I showed her a blow up of that – well, in fact, the original size we got it, and I was convinced, as a result of this conversation – I felt a

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bit silly talking through this door. It was like talking to a wooden door.

And I did – I had taken a precaution, journalist precaution, because I did want to get more photographs of Raul to try and get people to ID him, and I had hired a photographer with a long telephoto lens, and in the end I said, look, I will give you a mobile telephone number; please, ask your father.

I'd thrown in various names of people that I had associated with Raul in the hope that I would stimulate sufficient interest or concern that he would at least want to talk to me, and I gave them the mobile telephone number. I have to say I did not give him the hotel we were staying at because I think I was a little bit scared really.

**Q.** Okay.

**A.** And then – and then I left my visiting card in the post box outside, and after we had driven away, we got photographs of the daughter in white getting the card out

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of the post box and going in the house.

The following day, I rang Raul from the mobile, and I spoke to him for about ten seconds, and, basically, he just hailed abuse at me and slammed the phone down.

I rang back about ten minutes later hoping he'd cool down and said, look, all I really want to do is just have a conversation, a sensible conversation.

If you're totally innocent, what have you got to fear? If you're not involved in any of this, the sensible thing – now, I've had forty years in journalism, and I have spoken to an awful lot of people, many of whom were villains, but many of whom were innocently involved and caught up in something, and the people generally are more than happy to sit down and tell you their side of the story.

And quite often, you say, well, I'm sorry I troubled you, I really am, you know. The last thing I want to do – the reason we never went public with the name, nor ever have done, was because I never felt I got the

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final piece of the jigsaw, and because I hadn't got that, I thought it would be wickedly irresponsible to go public with this person and possibly give them a lot of grief. That's the job of the law, not of a journalist like myself.

**Q.** Could you just –

**A.** Sorry.

**Q.** Could you just – that's all right. Could you just describe – it's very helpful. Could you just describe again for the jury, so it will help them with the visualization, of the door and where the daughter was standing and what was between you and her, and the second part of the question is, are you convinced that she could clearly see the photograph that you showed her?

**A.** Yes. The – it was a modern house in a row, quite expensive houses. Although, this was one of the more modest houses in the row. It was by itself. There was quite a gap on both sides. There was, I think, three or four steps up to the front door. The

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front door had an iron grille, an ornate grille, not a sort of embellished grille, just a real sort of ornate thing you see in Spain quite a lot, decorative grilles, and then there was a sort of a glass door with a sort of mesh substance.

Now, I could see the shape quite clearly inside, but it was dark inside. Outside – of course, I was in daylight, and there was no doubt at all that she could see whatever I was showing her outside. She didn't say, I can't see the photograph or anything like that. She acknowledged seeing the photograph by her answers.

**Q.** And you are convinced that when she saw that photograph, she acknowledged that that was a photograph of her father?

**A.** I came away absolutely convinced that she had acknowledge that. Yes, sir, I did.

**Q.** Mr. Saltman, did you memorialize that conversation at the front door with her?

**A.** By memorialize, you mean did I write it down?

**Q.** Did you record it?

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**A.** Record it, sorry. Yes, we did. Yes, I'm sorry. Yes, sorry. It wasn't really high-tech I'm afraid. It was just a little old tape recorder that I had with me which I had in my pocket.

Yes, I did record it. This is my own safety because, you know, people sometimes say I was harassing them or whatever, and I just wanted to make sure that there was no – on tape – anything remotely like that.

**Q.** This is routine practice for you in pursuing your profession?

**A.** Well, I should think most journalists, radio, television and print these days, carry tape recorders. One, to get an accurate version of what people say. The days when journalists like me had to learn shorthand are long since gone. Yes, in the modern technology, it is standard.

**Q.** Mr. Saltman, I'd like you to listen to a tape recording which you have provided to us and see if you can authenticate it for the Court and the jury.

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(Whereupon, a portion of an audiotape recording was played.)

**Q.** Would you identify the other voice on the tape, please.

**A.** That's the voice of my associate, Kenneth Herman, who – with whom I've been working on this story for an awful long time. He was a private detective. He's now retired to Florida, and that's his voice. He came with me to the door.

**Q.** Was anyone else with you at the door?

**A.** No, no one at the door. Just Kevin and myself.

**DR. PEPPER:** Okay.

(Whereupon, a portion of an audiotape recording was played.)

**DR. PEPPER:** Your Honor?

**THE COURT:** Yes.

**DR. PEPPER:** While the technician sorts out some of the – of the interference here, could we take a brief recess?

**THE COURT:** Yes, sir.

(Whereupon, a recess was taken.)

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**THE COURT:** Bring in the jury.

(Whereupon, the jury returns to the courtroom.)

**DR. PEPPER:** Thank you, Your Honor. In order to save the Court's time on this last day before the holiday, what we've done is to move this tape, authenticated by the witness, up to a very critical point where he shows the photographs and asks the daughter to look at it.

We will leave – enter the tape into evidence, Your Honor, and move to have it entered into evidence afterward and leave it available to the Court and the jury to listen to through headphones at any time if they want to, but, for now, let us just move us up to that point in time.

(Whereupon, a portion of an audiotape recording was played.)

**DR. PEPPER:** Will you repeat that?

(Whereupon, a portion of an audiotape recording was played.)

**DR. PEPPER:** Once more.

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**THE COURT:** Just a moment. Before you play it again, can you all agree on what she's saying?

**DR. PEPPER:** Counsel, do you want to –

**MR. GARRISON:** Your Honor, I understand what she said.

**DR. PEPPER:** We believe she's saying: You got a photograph from a naturalization file or thing, and anybody could get that photograph. Then she goes on to say: If you got that photograph, you can get other information that you want.

**THE COURT:** I can't understand a word she's saying.

**DR. PEPPER:** Let's try –

(Whereupon, a portion of an audiotape recording was played.)

**DR. PEPPER:** Okay.

**THE COURT:** All right.

**Q.** Okay. Mr. Saltman, this is the conversation that you recall?

**A.** Yes, it is. Yes, sir.

**Q.** And you recall this response from

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her: You got this photograph from a naturalization – sounded like – thing?

**A.** That's right. It's a photocopy of the photo that was used for his naturalization papers.

**DR. PEPPER:** All right. Okay. Nothing further. Nothing further, Your Honor.

**THE COURT:** All right.

Mr. Garrison?

**MR. GARRISON:** Your Honor, I have no questions. Thank you.

**THE COURT:** All right. Thank you very much. You can stand down now, and you are free to leave if you'd like, or you can remain in the courtroom.

**THE WITNESS:** Thank you, Judge.

(Witness excused.)

**DR. PEPPER:** Your Honor, plaintiffs move admission of this tape into evidence.

**THE COURT:** All right.

(Whereupon, an audiotape was marked as Exhibit 16.)

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**THE COURT:** Call your next witness.

**DR. PEPPER:** Yes, Your Honor. This section of plaintiffs' case deals with the broader conspiracy in the development of the case of unknown co-conspirator defendants.

Plaintiff would like to move into evidence an article that was published by the *Commercial Appeal* on Sunday morning, March 21, 1993. I'd like to read into the

record just one short portion of that article, and then turn the entire article over to the pile of evidence.

That is this section: On March 31, the president of the United States became a casualty of Vietnam. Johnson announced he would not seek reelection. On April 3rd, King returned to Memphis, Army agents from the 111th military intelligence group shadowed his movements and monitored radio traffic from a sedan crammed with electronic equipment. Eight – eight Green Beret soldiers from an operation detachment Alpha

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180-14 were also in Memphis carrying out an unknown mission. Such A-teams usually contained twelve members.

Plaintiff moves this entire article into admission.

(Whereupon, a document was marked as Exhibit 17.)

**DR. PEPPER:** As a result of this publication, which itself followed an eighteen-month investigation of the reporter, Your Honor, plaintiffs' counsel became involved in this aspect of the case and settled a procedure whereby evidence could be developed, and I would like to just move the admission of an affidavit into evidence with respect to the procedures that were followed by counsel in obtaining this evidence. I will only read a portion of the affidavit that deals with those procedures.

**THE COURT:** Affidavit by whom?

**DR. PEPPER:** Excuse me?

**THE COURT:** Whose affidavit is it?

**DR. PEPPER:** May we approach?

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(Whereupon, a conference at the bench was held outside the hearing of the jury.)

**DR. PEPPER:** With the Court's permission, I'll continue.

**THE COURT:** All right, sir.

**DR. PEPPER:** Paragraph 10:

Initially, in response to precise question – well, let me start with nine.

From late summer of 1993 through August of this year, 1995, the time this affidavit was developed, I have helped Doctor Pepper in his work.

Initially, in response to precise questions, I've provided him with detailed background information. Also at his request, I carried specific questions to a number of the covert Army team, which was in Memphis on that day of the assassination.

This soldier, who now lives outside of the United States, knew of Doctor Pepper and agreed to – he agreed to answer his questions. Because Doctor Pepper is a lawyer and, in particular, James Earl Ray's lawyer,

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he would not agree to meet face-to-face with him. I have known this former Green Beret now for a number of years and have always found him to be truthful and reliable.

On behalf of Doctor Pepper, I traveled to see him on several occasions, taking with me detailed questions about the mission in Memphis and other assignments of his during 1967 to '68. After each trip, I was debriefed by Doctor Pepper, usually face-to-face, and subsequently in numerous telephone conversations.

Both the questions and the debriefings were detailed and comprehensive.

The soldier would never volunteer information, neither would he speculate. If he didn't know the answer, he would say so, and, occasionally, he refused to comment. I believe that he was true to form, truthful and candid in the responses he gave.

Since I was unfamiliar with much of the subject matter, I was not in a position to lead the soldier or influence his answers. That was the procedure that was

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followed over quite a period of time, and this affidavit was executed on 11 September, 1995.

With the Court's permission, I'd move its admission into evidence as well as other documents that we will cover in the course of this examination. We will, however, also with the Court's permission and agreement with counsel be redacting names of individuals in these documents for their own safety and security, but to enable the Court and the jury to have access to the documents.

**THE COURT:** Okay. You have the Court's permission.

(Whereupon, a document was marked as Exhibit 18.)

**DR. PEPPER:** Plaintiffs call their next witness, Professor Clay Carson.

**CLAY CARSON,**

having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

BY DR. PEPPER:

**Q.** Dr. Carson, good afternoon – barely

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afternoon. Thank you for joining us here. You've come some three thousand miles, and I know that time is precious in terms of your schedule, so I'd like to just move ahead.

Would you please state your full name and address for the record.

**A.** Clayborne Carson, Palo Alto, California.

**Q.** And what is your profession?

**A.** I'm a professor of history at Stanford.

**Q.** And what do you – what is your relationship to the works and life of Martin Luther King, Junior?

**A.** I'm the editor of Martin Luther King's papers, and I'm [director of the Martin Luther King papers project](#) at Stanford.

**Q.** And how long have you been in that position?

**A.** Fifteen years.

**Q.** And have you published various works on Doctor King's work and life?

**A.** Yes, I have. I've published, I think, edited or authored five – I think

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five books on Martin Luther King.

**Q.** All right. And is the [King papers project at Stanford University](#) an ongoing project?

**A.** Yes, it is. It's a long-term project to publish all of the historically significant papers of Martin Luther King. It's been going on for fifteen years. It will probably go on as long as I go on.

**Q.** And in your capacity and as part of that project at Stanford, do you have the process of collecting documents and materials of all sorts of natures related to Doctor King's life, work and death even?

**A.** Yes, sir. The purpose of the paper is – papers project is to assemble all of the historically significant papers from archives around the world. We've contacted probably some two hundred or more archives to make sure that we have all of the historically significant papers. Obviously, the largest collections are those at the [King Center in Atlanta](#) and at [Boston University](#).

**Q.** Right. And as a part of that

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responsibility, did you receive from me certain documents, certain reports, with respect to the assassination of Martin Luther King?

**A.** Yes, I did.

**Q.** And it should be clear to the Court and Jury that you are not in any way involved in attesting to the accuracy or the validity of this information, but you are simply reporting on what it is that you have received; is that correct?

**A.** That's right.

**Q.** So we're asking you to do that in a professional capacity and in line with your role as editor and director of the King papers project.

With that background, Professor Carson, I'd like you to move, please, to the first set of responses in the documentation that I've provided to you and of the project that I addressed to a resource who was traveling and providing me with information.

The Court and Jury have become aware with how that process worked so we just need

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to go into a question and answer mode here.

On Page 2 of – well, on Page 2 of the questions and whatever page of the response, I'd ask you to turn to Paragraph 2.1.4, and the question that was asked to be answered was: Was the operation, in re, our target, a one op, or were there other similar operations? If others, any details possible. Please, at least learn if they were domestic, foreign or both.

What is the answer that you have?

**A.** Answer: Lots of other ops nationwide. These are the ones I was at, summer of 1967 – parentheses, June 12th through 15th, 1967 – Tampa, Florida. Two Alpha teams deployed during riots. Detroit, summer, July 23rd, riot. Washington, October 1967, riot. Chicago, just before Christmas, 1967, recon. February 1968, Los Angeles.

**Q.** Thank you. Question 2.1.5: When was the instant operation? The instant

operation is the Memphis operation against Martin Luther King. When was the instant operation

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first raised with him, that is, the source. A, where and by whom? Answer.

**A.** Answer: Date unknown. Place, Camp Shelby, Mississippi. Briefed by Captain Name. First, a recon-op – not sure when killing King first mentioned.

**Q.** What – 2.1.6: What were the first details of the operation scenario put to him? A: Was target named?

**A.** Yes, King. Another answer.

**Q.** Yes. Please continue.

**A.** Young added later.

**Q.** First answer, King. Young added later.

B: What was site?

**A.** Site not set. Depended on our intel and recon. We positioned at rooftop ascent across Lorraine motel about 1300 hours, 4 April. Don't know why or how intel came in.

At brief, 0430, reminded Doctor King was the leader of a movement to destroy American government and stop the war. We were shown CR, close range photos, of King and Young. Don't know – don't remember

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anyone worrying about killing those sacks of shit.

One bud – buddy on Team 1, remember bragged about him, had him in center mass, parentheses, this is a sniper term meaning cross hairs and center of chest. During that big March in Alabama, should have done it then.

Parentheses, Bill, I did some checking from my files. There is a John Hill listed among the 20th special forces teams that was deployed in Selma, Alabama in 1965 for the beginning of the march to Montgomery.

I interviewed two of the team members who were there, and they said a sniper team had King in their scope until he turned left and crossed the bridge. This may be the same Hill on main team. None of the other names match.

Another Name – parentheses, that's me – asked about clothes. We were dressed as working stiffs working on the docks.

Parentheses, I believe this means their cover

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was day laborers on President's Island where the riverboat barge and the warehouses are located, end parentheses.

Equipment was stored in suitcases, moved along, came up in cars from Camp Shelby. Only place I remember eating in Memphis was a Howard Johnson's.

My spotter and I were met by a Name down near the train tracks where we were let out. I remembered this guy because he looked a lot like a buddy – parentheses, buddy of mine. This guy got us to the building where we set up. I always figured he was a spook.

From him, we got a detailed AO – parentheses, area of operations map – not the kind you'd buy in a gas station, pictures of cars the King group were driving, and the guy got us to the building where we set up. I always figured he was a spook.

From him, we got a detailed AO – parentheses, area of operations map – not the kind you'd buy in a gas station, pictures of the cars the King group was driving and the Memphis police tact – parentheses,

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tactical radio frequencies. Maybe some other stuff, I just don't remember.

**Q. C:** Any explanation of reason?

**A.** Name gave none.

**Q. D:** Any indication of sanction by or involvement of others, one at federal, state or local levels?

**A.** Everybody but my brother was there. Spooks, the company – parentheses, CIA – Feebs – parentheses, FBI – police, you name it.

The only person I remember talking to besides CO, Name, was some guy who was the head of the city – parentheses, Memphis tact parentheses – tactical squad. I think his first name was Sam.

Name put him on radio to describe to us what was in that hotel – parentheses, Lorraine. I do remember he saying friendlies would not be wearing ties. Took that to mean that somebody inside the King group as informant.

Did meet in person one other guy. Met him on sidewalk down couple blocks from

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our perch. Directed by Name. This guy identified himself with the police intelligence. Said city was about to explode, and blacks would be murdering whites in the streets.

After a few minutes, I figured was asking me to sit tight and kill any rioters if things went to hell. He seemed to know something about us and said had met with Name before this day.

**Q. E:** Was operation pure military, any involvement of FBI, state police, local sheriff's, poster police, civilians, anyone in targets organization?

**A.** Our part military. Far as I know, we were coordinating with units at NAS. This would be Millington Naval Air Station.

**Q.** Okay. Move over to the response to Question 3, please. Was he aware of any support from inside Doctor King's organization, SCLC, or inside the local Memphis groups working with Doctor King? Details and names if possible.

**A.** Scuttlebutt was 111th – parentheses,

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military intelligence group out of Fort McPherson – had guy inside King's group.

**Q.** Moving to Number 7. Did he actually see anything at the time of the shooting? Where was he precisely?

**A.** I thought Team 1 had fired early. I guess I still think they may have. After that day, I only saw Captain Name twice more, and both times, he refused to talk to me about what happened.

After the shot, I keyed – parentheses, radioed – CO to ask for instructions, and after a wait – parentheses, I think this means Name told him to wait – was told to exit building and make our way to pick-up point.

If this helps, I heard a lot of gunfire, and I think remembering – I remember thinking it was an Army sniper shot. It surprised me later when I heard some wacko civilian had done it.

Name described the shooting to me, and let me tell you this. Whoever fired that shot was a professional. Even from three

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hundred meters, there's no way just anyone could make that shot.

**Q.** Eight: If the military unit did it, how does he explain the head shot, and their not waiting for the coordinated hits from the second target, A-Y, after [Andrew] Young?

**A.** When you have everybody's hands in someone's pants, it's a cluster fuck. That's what happened in Nam – what happened here.

**Q.** What kind of weapons were they carrying?

**A.** Standard forty-five caliber sidearms, M-16 sniper rifles and some K-bars – parentheses, this is a military knife. We also had some frags – parentheses, fragmentation grenades – and two or three laws, light anti-air – anti tank weapon

rockets.

**Q.** Ten: How did the two teams communicate with each other? When was the last contact prior to the killing?

**A.** By radio. The shot was fired just after the TTR – parentheses, top of the hour I guess this means, 1800, end parentheses –

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sit rep – parentheses, situation report.

**Q.** Eleven: Set out details of their exiting Memphis, how – where they went.

**A.** Exit by foot to waiting boat.

**Q.** Finishes the first section. Now the second – second series of questions and answers. We'll just move through these.

Number 1: Where was Young?

**A.** Best I remember, a bunch of them had been upstairs. My spotter got Young when they all left. He went downstairs. He had come out of his room below and looked like to me was heading for the – a car when the shot was fired. We were just getting ready to do the sit rep. He was definitely out of his room.

**Q.** Second page, 2.15 and 2.16: What was the nature of the training – real purpose training?

**A.** This was a recon, slash, surveillance mission to support major Army element at Millington and possible deployment of other heavy units, dash, one of the dozens in cities with large black populations.

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We were walking the ground literally. We would walk city streets to identify possible sniper and ambush sites, anything that would help the guys coming into a riot to survive.

Target reduction – parentheses, Bill, he means killing Young and King, end parentheses – was discussed as an option should the situation go in the toilet, and we had a riot on our hands in the AO – parentheses, area of operations. Then and only then was that option briefed.

You need to talk to him – parentheses, he's referring here to you, end parentheses – about how a military mission is done. Logistics, intelligence, communications which make up seven-eighths of a mission. What I'm saying is that target reduction was brief, but we had to get to a riot before it was authorized on the net.

Do you want me to go on?

**Q.** Yes.

**A.** Here Name digressed into an argument over radios. Said team had PRC 77's,

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although wanted more sophisticated AN, slash, PRC 117. Caused big argument because they couldn't get them. Said PRC 77's unreliable. Out of – on that roof that evening, we were watching. I had Young targeted, but only to watch.

**Q.** Then moving down – Bill, I asked here about the psychological warfare photo recon stuff at this point. Continue.

**A.** Big psy-ops (phonetic) plan to discredit King and his party using any means at hand. We weren't told much about this, but, again, SOP with fifth special forces was psy-ops included and everything.

M-A-C-V-S-O-G had long time begged into this.

We call this, quote, gray operations and spreading propaganda to newspapers and radio stations. This was done a lot against black pot-heads. I wasn't involved in this, but I kept my ears open, and this was a big push.

Any intel we picked up to help this effort out was passed back up the chain. Not

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sure about reserved element of psy-ops. Most guys in Nam I knew worked for the fourth psy-ops group at Teng Sau Nu. I know there they ran their own newspaper, radio and TV operations.

**Q.** Yes. 2.1.7: When was Memphis first mentioned?

**A.** Not sure. Original brief of twentieth recon operations including – included Memphis among cities where possible rioting was possible at Camp – Camp Landing. Parentheses, Bill, this is in Florida, end parentheses.

Memphis was scouted 22 February by Alpha team for sniper communications and supply sites. We had a lot of stuff going in, but previous recon produced a lot more.

What we were doing is similar to Nam. Maps, terrain studies, readouts of infrared imagery from aerial recon blackbirds – parentheses, Bill, he's referring to SR 71 blackbird over flights of Memphis and other potential riot cities, this mentioned in my series, end parentheses –

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and anything else we could find, which we shipped to S2 and Nam Trang.

Here we shipped to Camp Shelby S2. Where intel went from there, I'm not sure.

**Q.** 2.1.8: Who was in charge of training?

**A.** Name Captain.

**Q.** How long was the training period?

**A.** Can't remember. Too long ago. Too many missions before and after.

**Q.** During training – 2.1.13: During training, who were you told were targets?

**A.** We were told these were recon missions whose purpose was to reverse the cluster fuck in Detroit where our guys didn't even have maps of city streets. Our mission was to walk the ground before the heavies – parentheses, Bill, means tanks and APCs here – got there.

Training was entirely based on identifying communications links, supply sites, places where troops could be quickly and safely inserted where the black community was, where black churches were, where black

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leaders congregated – parentheses, restaurants, churches.

**Q. 2.1.14:** Other members of team involved other sites.

**A.** Worked with Captain Name in Tampa.

**Q. 2.1.15:** Were all those 9-0 second operations?

**A.** Don't know and don't care. What I know is this. You start asking a lot of questions about the 9-0 second – he pronounced ninety-deuce – you'd better be digging a deep hole.

Parentheses, Bill, he was very reluctant to discuss 9-0 second. I tried several times in this interview to broach subject. He refused to.

**Q. 2.1.16:** Who controlled training and actual operations?

**A.** Team leader and his exact control.

**Q. 3.2:** Who was on the February 22nd Memphis recon mission?

**A.** I was on it. Will give other names if agreed they not be made public.

**Q. 3.3:** Did entire unit go together to

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Memphis on 4 April or separate? Explain.

**A.** No. We went in separate cars in two's.

**Q. 3.4:** What time leave Camp Shelby from Memphis?

**A.** Don't remember.

**Q.** 3.8: You're referring to this Name fellow – I'm sorry. 3.8: Who did spook on ground work for?

**A.** You're referring to this Name fellow who met us down by railroad yards. Guy smelled like a company guy. We had maps, but this guy gave us a detailed map of the AO – parentheses, area of operations – not a regular service station map. This was like a grid map you got in the field with street and building names.

Anyway, this Name, I think it was James reminded me of a friend. I got no proof though, but he was definitely a spook.

**Q.** 3.9: Details of conversation.

**A.** You got to be kidding. We just talked about the current situation, our location and radio net.

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**Q.** And then questions 3.9 to 3.14.1: No answers?

**A.** Parentheses, Bill, these questions, he simply could not remember.

**Q.** That finishes the second section.

Lastly, Professor Carson, you have a one-page report of a meeting that took place in Chicago, also at plaintiffs' counsel's request, having to do with the location of some photographers on the roof of the fire station in Memphis.

Would you read that report, please.

**A.** Trip to meet Name, 1 December, 1994, Chicago. Location, Hyatt Regency, downtown off Michigan Avenue. Breakfast, slash, lunchroom off of lobby.

Description, about five-feet-ten inches, one-sixty to one-seventy pounds. Gray, short chopped hair, nice suit – parentheses, Brook Brothers style – wing tipped shoes, erect, obviously ex military.

Said in Vietnam assigned first SOG – parentheses, special operation group – base, Kan Tu, worked 525th

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psychological operations battalion. Refused to discuss place of birth, date of birth or other personal info.

April 3, 4 weekend, 9-0 second operation.

New Colonel Name, worked with him number of assignments. Two agents in Memphis day of killing. Therefore, routine photos and surveillance copied to Name and Name –

**Q.** Yes.

**A.** – believed distributed to other agencies. Idea to pick up anyone in photos, might be identified as communist or national security threat – such H-U-M-I-N-T-S-O-P in King's surveillance.

When King came out on balcony, camera was filming. No photo moment King shot, but several of him falling.

Second guy with Name watched approaching cars, heard shot and saw white man with rifle. Quickly snapped his picture several times as this guy left scene.

Shooter was on the ground clearly visible. Name witnessed only his back as left scene. Said never got a visual face ID.

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Name and second guy rooftop of fire station, both armed with forty-five caliber automatics. Second guy carried small revolver in holster, small of back.

Pictures hand delivered to Colonel Name, but second guy with Name kept negatives. Name has no copies. Said will approach second guy for two thousand dollars, give us name and address.

**DR. PEPPER:** Thank you very much, Professor Carson.

There is a final document, which is a chronology of important dates, that has been provided to us from January 17, 1967 to the 4th of April listing dates, times and places and subjects of meetings that took place in government agencies throughout that entire year.

We're not going to go through that here, but I am going to close that and move that that be admitted as a part of the total package of evidence.

Thank you for coming, and no further questions.

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**MR. GARRISON:** I have no questions, Your Honor.

**THE COURT:** All right. You may stand down.

(Witness excused.)

**THE COURT:** Let me ask you, have you got anything really short?

**DR. PEPPER:** I'm afraid not, Your Honor. I'm sorry.

**THE COURT:** I know how sorry the jurors are to hear that.

Okay. Ladies and gentlemen, we're going to stop here today. I know there are several of you who want to get started for the holiday. I hope that you all survive it and that we'll see you early Monday morning.

(Whereupon, court was adjourned, and proceedings were to be resumed Monday, November 29, 1999.)

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