

**LAWSUIT SUMMARY RE DANGERS TO PUBLIC SAFELY AND JEHOVAH'S
WITNESSES CHILDREN FROM SEXUAL ABUSES IN CALIFORNIA, TEXAS,
NEVADA AND WORLDWIDE**

This mostly condenses hundreds of pages of court documents about Amy B's lawsuit which she had in Texas against the Watchtower Bible and Tract Society over Jehovah's Witnesses and its alter egos collectively called Watchtower Defendants (also here sometimes called Watchtower or the organization) as well as the already imprisoned Jehovah's Witness (JW) pedophile Larry Kelley. Amy B's lawsuit and also lawsuits involving at least fifteen additional persons who had also been children of JWs when raped by JW clergymen known as Elders and Ministerial Servants, were, for example, in Texas, California, and Nevada, and, given that Watchtower policies are conducted the same or virtually the same in nations around the planet, it also helped lend emphasis to and make even more of a worldwide impact starting 2007.

Although there was a gag order, Silentlambs (www.silentlambs.org) provided key information to allow researchers to find information indicating at least one victim received about \$750,000 from Watchtower Defendants to settle out of court and the rest probably also did for a total of over \$12,000,000 calculated at sixteen victims. To stay factual there are few explanatory notes or comments except as clearly so indicated by wording or enclosing parentheses.

PANORAMA LETTER

In a May 9, 2002 letter to BBC television's Panorama's reporter Betsan Powys, Watchtower Defendants said there is a list of persons the Watchtower Bible and Tract Society has (kept on a database in upstate New York) although not just of JW child abusers but also some JWs only accused of child abuse, some alleged such based on "repressed memories" which "many authorities challenge," some alleged such who are nonJW parents of JW children, people JWs/nonJWs connected with JWs who may not be child abusers as considered such in some jurisdictions for example because of their age, JWs persons guilty of voyeurism or involved with child pornography. (Of course since 2002 that list has grown; some have guessed entering 2008 to possibly thousands more; nor do these figures include pedophiles tracked in other zones around the earth)

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FROM AFFIDAVIT AND DEPOSITION DOCUMENTS BY AMY B AND OTHERS
Opening reference: CASE # 91,08-C-1; District Court of the State of Texas for the County
of Potter; Filed: June 3, 2003

**Warning: Because this subject material deals with the crime of child molestation some
language and content may be unsettling to some readers.**

Amy B states (p. 26) ..."He crawled into bed with me and started fingering me and penetrating me and rubbing my breasts." p.27 ...And it happened the next night kind of exactly the same way.

“I was encouraged by the Elders of the **Amarillo Southwest Congregation** of Jehovah's Witnesses to help out with **Larry Kelly's** wife, **Judy Kelly**, by cooking and cleaning in their home. I was also assigned by the Elders of the Amarillo Southwest congregation of Jehovah's Witnesses to work with Judy Kelly to prepare for presentations in the weekly Theocratic Ministry School which involved my going to the Kelly home. Larry Kelly also often took me from the congregational meetings to his home to complete the "Watchtower" studies required by the Elders of the Amarillo Southwest Congregation of Jehovah's Witnesses. While at the Kelly home for these purposes, I was sexually molested by Larry Kelly. The sexual molestation included Larry Kelly penetrating my vagina with his fingers. This penetration occurred on numerous occasions. Larry Kelly also sexually molested me, including penetrating my vagina, when he would take me out in Service. I was 8-9 years old when the abuse began." (Service generally means preaching door-to-door or preaching to return visits at the Public's households.)

Amy B stopped going to a counselor after two or three times because the Elders said “not to speak of it, not to gossip about it, not to bring reproach on Jehovah's name by speaking about it, and pretty much that I would end up in a lot of trouble if I did talk about it. And me, as a child, that meant not to anybody.” The meeting where this was said was “with **Elders Chuck Regal and Larry Laws** at one time.” At another time at **Parkway** a couple of elders including an Elder named Renteria took her, later her dad and mom aside, and told them to not speak about it. Amy B said after 1992 even though perpetrator Larry Kelley had been convicted he followed her out of a convention to the women's bathroom, later also following her at Westgate Mall so that she had to run to get away.

The attorney also dwelt on her having been hospitalized in the Pavilion for a nervous breakdown in 1995 when fifteen with symptoms of stress, depression, and suicidal ideas. He also brought up that her mother had bipolar disorder, that is manic depression, and had been diagnosed with it moving from Canyon to Amarillo. She was also having to help take care of her mother and diabetic brother **Michael**. The attorney made a point to ask if she had been hearing things at times to which she said no, although yes to having slept with clenched teeth, that is petit mals, through the night and sometimes day. In August 1995 she was readmitted to the Pavilion after attempting suicide from being shunned at the kingdom hall (JW church building) after reporting the molestation.

In comment, the Watchtower attorney appeared eager to try to act polite while also shifting attention from the defendants to the victim, his tactic possibly to engender the idea that her having had to have psychological aide made her witness unreliable and even a possible cause for the abuses sustained from the convicted pedophile, Kelley. In a courtroom such a ploy might instead have boomeranged.

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Already convicted perpetrator **Larry Kelley**, a TV personality in the Amarillo area, himself said that he had been an Elder at Dumas and some other **Elders then there were Lyle Jones, Rodney Jones and Doug Dickman**. He believed when he moved from Dumas to

Amarillo, that **Chuck Regal** there knew he had been deleted as an elder for molestation at Dumas, but the Elders at Amarillo let him go out preaching in the door-to-door service with JWs. (Being generally the only male in a car with generally all women and children he would have been their leader as commonly known to the Elders.) He refused to tell how many JWs he had also abused at Dumas or how often on the basis that his answering might incriminate him.

Kelley was asked if he knew a **J.C. and Carla Huffman**, also a lady named **Joan** with five children (**Rachel, Esther, Mary Jo, Laurie and Nickie**), to which he refused to answer. The attorney noted that Kelley had been convicted of not only abusing Amy B but also a Tamara J.

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A deposition was taken from **James W.** on March 9, 2004, who had at different times been an Elder among JWs (roughly 1984 to 1985) and later a ministerial servant. Helping W. were present the attorneys **Gregory S. Love, William L. Brelsford, Jr, and Robert J.Schack**. The interrogating Watchtower Defendants attorney sought to discredit W by bringing up that W had once been privately reprovved at **Richland (California or Oregon)** after voluntarily confessing for the sin of smoking, at **Petaluma (Petaluma West Congregation, California)** a first time after volunteering he had smoked, a second time at Petaluma (West) after volunteering he had once had a prostitute in a room (no indication of sex) so that he resigned as an Elder, and once in **San Francisco** after confessing to masturbation judged a sin by the Watchtower.

The Watchtower Defendants' attorney next had James W say he had resigned as a ministerial servant at **Mt. St. Helens, Oregon**, because of his wife's health, after which he wrote a letter in 1993 to **Don Adams** (major figure among Watchtower Defendants; see endnotes) threatening to sue over harassment being conducted against his wife that was harming her health. James W noted that his children had learned Elders were discouraging others from associating with the family based on the spreading of false information, rumor, gossip and lies.

The Watchtower attorney brought up **Deanne (Diorio) Coe**, the stepdaughter of **Vince Diorio**. Brought up was that a **Don Glew** had abused **Jocelyn Amos**, Don Glew's daughter **Sherry DeLaToree** who was either the daughter or stepdaughter of Don Glew. (Glew, a former JW Elder in **Santa Rosa** and Petaluma was convicted in 1989 of four counts of child molestation and sentenced to 14 years in prison.)

They had all met as a social gathering of three families of about 20 people at the home of a **Howard W** who although with the same last name was unrelated to James W. Howard W was a friend of Don Glew. Among those there were Don Glew's children Michael and Rebecca Glew. The attorney also brought up a **Dennis Smith and Joe Risonky**. He brought up Donald Glew's doings in regard to a congregation at Tracy, California, East Bay Congregation and North Bay Marin County area and Glew's serving as a ministerial servant in some of a number of congregations.

Howard W and Joe Risonky told James W that Don Glew had molested at other congregations, and later Howard W may have moved to the Midwest or Missouri. While putting in order congregation records, James W said he noticed that Vince Diorio had molested Deanne (Diorio) Coe. The attorney was also keen to discover what James W might testify about things such as how the Watchtower organization is structured, disciplinary actions including in regard to child abuse.

James W said he had told been by **Presiding Overseer Ron Strubb**, who in turn had had it confirmed by **Circuit Overseer Harry Snow**, to not report to authorities child abuse regarding **Bill Elliott**. James W said he had first met Bill Elliott after Elliott was transferred in to serve as his then congregation's Presiding (main) Overseer while W was also an elder in 1985; a month later James W was told by Joe Risonky that Bill Elliott had been disfellowshipped (excommunicated/shunned) because just arrested for abusing the children of non-JWs. Risonky said Elliott also had a record of abusing children in previous congregations for which he had received light reproof, mostly north of Petaluma in California.

James W said that in Saint Helens, Oregon, he had also told the congregation secretary Elder **Gene Church** in April 1993 that they needed to report John Allen for abuse but they begged him not to do so then told him to keep his "trap shut." The then current presiding overseer **Elder Jack Fields** had confirmed Church's being a molester, as had school overseer **Elder Curt Hardy**. The county sheriff had also said there was a file on Church when W reported what he knew.

After Glew was arrested the Elders said there was nothing more to be done or said by themselves. W was still concerned and wanted them to say what to do if more pedophiles came to light, but they did not want to say anything. He testified "And we did have other molesters, because Bill Elliott popped up in the scene, so it was certain in the --in my mind regarding **(Jim) Simms and Diorio**."

The Watchtower attorney told James W to tell his own experiences with sex abuse and abusers within the Watchtower organization controlling Jehovah's Witnesses. He replied "Well, that would involve the perpetrators we've already discussed; Bill Elliott, **Jim Simms**, Vince Diorio, Don Glew, John Allen, my experiences in interactions that we've pretty much hit on throughout our discussion today."

The Watchtower attorney told him to speak of Jim Simms. James W said Simms had come to the Petaluma West congregation of California in the mid-1980s when W was a book study conductor and congregational secretary Elder. He found Simms' admission of being a child molester in an unsealed envelope file. Simms had been given reproof and been restricted to attend meetings, not comment or say a group prayer. W had told **Elder Jon Hummel** who had written the restriction that Hummel had forgotten to seal the file.

The Watchtower attorney himself brought up that he knew James W might also testify before jury about a **Jim McKay** being a molester. W's oldest daughter Jennifer had

married McKay's son Aaron. Eventually Jim McKay was arrested for molesting a non-Jehovah's Witness girl who was about eleven years old after she had told school friends who in turn told a teacher who ultimately reported it to authorities.

At St. Helens James W met a JW named **John Allen**. James W said he in one instance witnessed John Allen run his hands up the dress of his (Allen's) youngest daughter Alva, and James W knew the county sheriff also had a file on Allen. In 1993 Elders told their own children that John Allen was a molester but not the other JW children or their parents. In April 1993 James W confronted Elders Gene Church and Curt Handy about it when they came to shepherd him back into activity. He said he was not going to return to the kingdom hall until they cleaned out the problem and turned Allen in to the authorities. They suggested he drive 20 to 30 miles to another kingdom hall while they handled things, but he said No, he wasn't going back unless they cleaned it up. James W never returned.

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DON ADAMS ADMITS WATCHTOWER SOCIETY IS HIERARCHY (THEREFORE RESPONSIBLE FOR MISDEEDS OF ELDERS)

A document was presented in which **Don Adams** (Note: Don A. Adams is President of Watchtower Society) officially admitted that the Watchtower is a top-down hierarchy organization with those at the very top in the Governing Body most responsible for what their appointed clergy and others do. He wrote in regard to a situation in which the **Bonham, Texas**, congregation of Jehovah's Witnesses had seceded from the mother organization, because the Watchtower organization wanted to regain deed and possession of the kingdom hall (JW church building) property the seceders had and hoped by showing that the organization controlled matters from top-down that it also had all rights to the kingdom hall.

Adams said that as he wrote the Elders which the Watchtower organization had sent in at Bonham, Texas, were: Luther Brogdon, Richard L. Scofield, Ronald H. Williams, and Bennie Bolin. The organization no longer recognized Wendel Baker, Trymer L. Berry, James E. Coleman, Ralph E. Deal, and Tony M. Jones.

Departing now the legal documents to explain and elaborate on these events involving the important highly relevant Bonham matter: The Elder who led the successful secession was apparently the previous Presiding Overseer Wendell Baker who also employed many of the local JWs with his business. As Presiding Overseer he had had a list of addresses of all the local JWs and so before bringing the decision to secede to a vote he sent mail to others informing them about the Watchtower organization.

Watchtower organization, despite admitting it is arranged as a hierarchy instead of allowing some to much or total autonomous self government locally as common with most Protestant churches and also Roman Catholicism, nevertheless failed in court to regain control of the kingdom property at 1105 Pecan Street, Bonham, Texas. The original

kingdom hall was kept by the seceded local Jehovah's Witnesses who apparently later diversified in beliefs and Christian memberships.

Even though only about ten of the original local JWs had stayed with the Watchtower organization, Watchtower built a **new kingdom hall building at Bonham, Texas**, big enough to hold maybe 150 people at 2360 E State Highway 56; Bonham, Texas 75418; phone 903 640-8113, and it had some more JWs move in and attend the new kingdom hall.

Watchtower rewrote its kingdom hall property documents so that no future congregation could keep rights to kingdom halls though they might meet in homes. All the seceding JW Elders and members were labeled apostates and shunned as also true of the JW victims such as Amy B.

Returning to the public court documents, they clearly showed the Watchtower organization admitted to being arranged as a hierarchy with a top-down arrangement of clergymen similar to the structuring of Roman Catholicism as also admitted in Don Adam's letter and also stated such in other documents that it itself had published.

The documents about hierarchy and policies in Amy B's lawsuit against Watchtower Defendants are important for example because from then on in other lawsuits, they handily, quickly established the Watchtower Defendants' degree of control and along with it the financial responsibility that accompanies such degree of control.

Another document from Watchtower itself showed how the mother organization had formed various new alter ego corporations, a common practice to try to confuse and make it more difficult to establish liability and get at assets in the event of major lawsuits causing loss of much money. Speculatively, in the instance of Amy B and the other sexually abused victims, Watchtower settled out-of-court instead of in it because of many reasons.

One is Watchtower attorneys saw the weight of the evidence proved as to its liability. They had sought to negatively portray victims and defenders of victims while seated on the side of already convicted pedophiles such as Larry Kelley, which would not sit well with jurists. There were simply too many victims and defenders to attack all of them successfully. Going forth into trial would have caused the Watchtower Defendants to have to produce the list of 23,270 proved and alleged pedophiles it keeps in court, after which it would become public property subject to the eyes of the alarmed general public, news services worldwide and Jehovah's Witnesses themselves.

Watchtower Defendants in consultation with the Governing Body explored other options. Instead of being convicted, they could as quietly as possible pay off the victims (they did and vainly as the A.P. carried the story), not stop the policy of forcing Elders to include pedophiles and other criminals among JWs sent to preach at the public's doors, begin training Elders how to deal with pedophilia enough that the Elders could not be deemed untrained or poorly trained and seen as more liable to jurists than the headquarters.

Elders intending to remain Elders would have to put into the records of JWs who might say they had been raped, as well as into the records of parents and potential friends of those persons, more information written and weighed so as to help portray those other JWs as so mentally deranged or immoral as to not be believed if they ever brought lawsuits, just as Watchtower Defendants had vainly sought to do with Amy B, James W, and other

witnesses. The more upright the character of a potential witness, the more preemptive need for such written evidence.

CHARISSA W. AND NICHOLE D. ET AL

In court documents those persons complaining of having been molested by Jehovah's Witness elders in "Christian Congregations of Jehovah's Witnesses" which is controlled by the Governing Body of the Watchtower Bible and Tract Society (also known here as Watchtower et al which is the foregoing and its alter-ego corporations) and in the given years were: **Charissa W** 1972-85, **Tabitha H.** 1977-80, **Javier C.** 1986-98, **Ken L.** 1984-87; **Daniel West et al** 1990-1997; **Jocelyn A. et al.** 1982-89, **Dennis S. et al** 1977-85, **Julianne Wimberly Gutierrez, et al** 1976-82, **Tim K.** 1994 v. Watchtower et al. – Superior Courts of Napa, Placer, Yolo, Sonoma, Tehama Counties, California. Eventually also added as a plaintiff was **Orphee D. Adkins** of 1936 Northwood Dr., Unit 4 in Vacaville. CA 95687. In pro per much later was **Fred Fritzinger**, POB 1055, Clear Lake CA 95401. (Note: Charissa alleged abuse from a Jehovah's Witness (JW) elder during 1972-85 and was born 1969 meaning showing she was a baby when first abused, while Nichole D in the lawsuit along with her was born 1971.)

Helping the victims in these matters before **Superior Court Justice W. Scott Snowden in Department B of Napa County, CA**, were **Nolen Saul Brelsford of Sacramento, CA**; **William E Bernard of Roseville, CA**; **(Greg) Love & (Kimberlee) Norris of Fort Worth, TX** along with **Fibich, Hampton & Leebron of Houston, TX**.

Helping Watchtower et al in court were attorneys Robert J. Schnack, SBN 191987, Tiffany P. Scarborough SBN 180981, Bullivant Houser Bailey PC 1 1335 Gold Express Drive. Suite 105 Gold River, CA 95670-4491 Telephone: (916) 852-9100 Facsimile: (916) 852-5777 E-Mail: bob.schnack@bullivant.com.

Listed as Watchtower attorneys practicing in New York: Attorneys at 100 Watchtower Drive in Patterson, NY 12563: **Philip Brumley** (home address 131 Brimstone Road, Patterson NY 12563 although also given for him in another document was 2891 Route 22, Patterson, NY 12563-2236); Mario F. Moreno (home address 720 Route 292 in Holmes NY 12531), Carolyn Wah, Adam Lett, Paul D. Polidoro, Donald T. Ridley, Robert C. James, Richard King, John Miller III, Richard Moake, Erna Neufeld, Gregory D. Olds (home address 79 Willow Street, Brooklyn NY 11201 involved with Religious Order of JWs), William R. Bell, Christine Benham, Max Custer, Michelle Dickinson, Lisa Douglas, furthermore: Michelle Dickinson at 27 Hudson Watchtower Drive, Ossining NY 10562; further: Christine Benham at 275 Tanner Marsh Road, Guilford Connecticut 06437; further, James M. McCabe can be mailed at 4817 Santa Monica Avenue, Suite B, San Diego, California 92017

Mentioned or in one way or another involved also along with the Watchtower were attorney Craig Diamond of Diamond, Baker, Phillips & Walters LLP in Cedar Ridge, CA for alleged child molester defendant Albert W. ("Red") Harriman a former elder of JWs at Colfax

Congregation of Placer County living at 35 Gilmore Rd., #17 in Red Bluff, CA 96080 sued by Ken L.; also

convicted child molester Donald Glew a former JW elder at Santa Rosa Congregation in Sonoma County of PO Box 424245 in San Francisco, CA 94142 (though Petaluma Congregation also mentioned) and sued by Jocelyn A. a minor and therefore by and through her guardian ad litem Joe A, Rebecca G., Michael G. and Nicholas S. Plaintiff Danielle A's attorney was Andrian Randolph of Randolph, Cregger, Chalfant in Sacramento; Lumped together among the defendants or otherwise mentioned were Napa Congregation of JWs, Oak Knoll Congregation of JWs also in Napa County, and Silverado Congregation of JWs. Some other names of alleged or convicted pedophiles: Edward Villegas a former JW elder sued by Charissa, Carlos Vasquez a former JW elder at Roseville in Placer County sued by Javier C; Timothy Silva (former JW elder/ministerial servant at Woodland Congregation, Yolo County) sued by West his attorney being William E. Bernard of 1624 Santa Clara Dr #210 in Roseville CA 95661, in another document **attorney Michael Wayne Jensen** of 1301 College St in Woodland CA 95695, in still another document Crystal Calloway; **Shawn Appling** sued by Danielle A; James L. Henderson a former JW head elder or Presiding Overseer at the Red Bluff Congregation living at 35 Gilmore Rd. #17 in Red Bluff CA 96080), Alvin Heard whose address was given as 703 Delta Street Klamath Falls, OR 97601 then later as Two Rivers Correctional Institute at 8291 1 Beach Access Road Umatilla, OR 97882; **Russell King** with attorney Ralph W. Thompson III of The Thompson Law Office in Monterey and with King's address as 239 Beach Road in Manna, CA 93933

On behalf of Watchtower, attorney **Robert J. Schnack** showed documents saying **Secretary-Treasurer of the Christian Congregation of Jehovah's Witnesses (CCJW) William H. Nonkes** swore CCJW (address 2821 Rt. 22, Patterson, NY 12563-2237) did not exist before incorporated August 21, 2000 in Putnam County. (Schnack's doing this may have, whether deliberate or not acted toward confusion of the lawsuits inasmuch as the CCJW is but one of numerous relatively new corporations created by Watchtower; in other papers (exhibits, depositions...) the same ploy was also vainly attempted for example regarding the Watchtower's Religious Order of Jehovah's Witnesses (ROJW) and Kingdom Support Services (KSS).

Nonkes said in 1972-1998, none of the co-defendants including, Edward Villegas, Carlos Vasquez, Albert W. (Red) Harriman, Timothy Silva, Donald Glew, Shawn Appling, Alvin Heard, or James Henderson were acting as a volunteer, agent, servant, employee, officer, director, or representative of CCJW nor acted as such for CCJW before 1972 or after 1998.

Numerous documents were presenting regarding the many corporations subordinate to Watchtower; for example Restated And Amended Charter Watchtower Bible And Tract Society of Pennsylvania at 25 Columbia Heights, Brooklyn, NY 11201-2483 but with registered office: 1630 Spring Run Road Extension, Coraopolis PA 15108 the Watch Tower officers were at the time of the document: Pres. **Don A Adams, VP Robert W Wallen, VP Wm F Malenfant, Sec-Treas Richard E Abrahamson, Asst Sec-Treas Danny L Bland, Asst Sec-Treas Philip D Wilcox, Asst Sec-Treas John N Wishuk. Documents showing Religious Order of JWs officers: Pres Patrick J LaFranca, VP Ralph E. Walls, VP Peter D Molchan, Sec-Treas Joseph D Mercante, Assist Sec-Treas Eugene D Rosam, Assist Sec-Treas Kenneth J**

Pulcifer, Assist Sec-Treas Marvin G Smalley (apparently the same Gene Smalley who writes answers to Questions From Readers in Watchtower magazine issues and is the main writer against JW's using blood transfusions). The Pennsylvania Department of State giving authority to the "nonprofit" Watchtower corporation is at Room 308, North Office Building, Harrisburg, PA 17120, so those wanting to have that authority revoked can direct questions and information to the department.

Plaintiff attorneys compelled Watchtower to give financial statements proving connections to congregations throughout California, payments in although also out, e.g.: Elder misconduct 01/01/1989 Red Bluff Cong, CA \$50,000; Defective KH gate closed on car 04/24/2000 **Northgate**, CA \$1020.1; unlawful tree trimming 10/01/1997 **Encino Cong.** \$28,673; Fall through sheetrock ceiling 03/27/1997 **English Cong, Carpentaria** \$31,495; **Peraza, Rosie** - Dislocated elbow Trip over curb stop in parking lot 07/13/2001 **Villa Bonita Spanish CA** \$3,000.0; Trip & fall on entrance mat 11/24/2000 **Woodley Spanish, Los Angeles, CA** \$2,228.8

Watchtower said Serbian Eastern Orthodox Diocese v. Milovojevich [426 U.S. 696 (1976)] showed courts would not decide church governance and appointment/removal of religious leaders; BUT that ruling also held it okay to evaluate hierarchy and internal information; so the Plaintiff attorneys could ask the court to order production of information about the secular matter of child abuse. Plaintiff attorneys said they wanted Watchtower to produce the insurance policy by which **Woodland, Quincy** and other congregations were insured by Watchtower.

AT 2000 WATCHTOWER MEETING GOVERNING BODY MEMBERS ADMIT TO OVERALL RESPONSIBILITY FOR WATCHTOWER SOCIETY'S ACTIVITIES; SPEAK OF THEMSELVES (NOT THE ANOINTED 144,000) AS "THE FAITHFUL AND DISCREET SLAVE"

A copy of minutes for the Oct 7, 2000 annual meeting of the Pennsylvania corporation spoke of evangelizing and that Korean Broadcasting aired a 10 minute video for bloodless surgery and many Korean doctors wanted copies; non-military service there still causing imprisonment; Mexico's newly elected president took and said he would read the brochure Jehovah's Witnesses in Mexico. Also highlighted preaching in S Africa, Ukraine, war-torn Sierra Leone. Governing Body member **Daniel Sydlyk** said the Governing Body is spiritual in nature but added as the **Faithful and Discreet Slave** it oversees 110 branches, personnel, services etc worldwide.

Governing Body member **Theodore Jaracz** said the organization continually needs to appoint more qualified elders and ministerial servants. He said no legal entity controls the appointments, the Pennsylvania corporation is merely a legal instrument of the Governing Body which had recently resigned from the Pennsylvania corporation. New directors of the NY Corporation are as **Pres. Max Larson, George Couch as VP, Jerry Grizzle as VP, Bob Pevy and Dave Sinclair**. The 3 new corporations were CCJWs for religious concerns, the Religious Order of JW's for controlling headquarters staff (Bethelites), and Kingdom Support Services Inc for the Society's engineering support and design of projects. Directors of the **NJ corporation** changed; a Florida corporation holds title to land in Florida and got new

directors, **Valley Farms Corporation** with title to NY land had board adjustments, and "**All of these serve under the spiritual direction of the Governing Body.**"

Watch Tower PA complained about having to tell the court how it is structured and its finances but did so, noting it held as property in California: **real property in Apple Valley**; remainder interests in six homes; one cemetery plot each in **Forest Lawn Memorial Park in Hollywood Hills**, and **Roosevelt Memorial Park Association in Gardens**. Included was a tell-tale letter from Watchtower PA's Pres Don Adams to another court where he tried (unsuccessfully) to regain control of a kingdom hall at Bonham, Texas, offering as claim for Watchtower ownership the admission that Watchtower has absolute control over everything going in line from headquarters staff and materials down into the congregations worldwide including its appointed elders.

Secretary-Treasurer of Kingdom Support Services Inc. Alexander W. Reinmueller served to answer questions in deposition due to his knowledge of Watchtower although that of Adams was much asked for. Various documents showed Watchtower loans money for building projects at a profit of 6% per annum, a \$10,000 loan requiring payments of \$120.00, those being requirements not donations. Watchtower itself said this was "not a commercial loan program." To little avail, Watchtower attorney Schnack objected constantly at having to answer various questions and submit various kinds of information. Deposition questions and answers involving Reinmueller showed Red Bluff Congregation in California contributed funds to the Kingdom Hall Assistance Arrangement as a Watchtower insurance program, \$50,000 was paid out to it because of an elder's pedophilia there, and Reinmueller said records were kept in his office. This showed when each JW donates money part of it goes to handle child molester incidents.

All the plaintiff victims said Watchtower had systematically conspired to cover-up allegations of sexual abuse within its organization in order to avoid harm or injury to its reputation and in order to avoid civil and criminal liability. When Charissa W was 3-4 years old, elder **Edward Villegas** began fondling her genitals, digitally penetrating her vagina and forcing her to have oral sex. He used his position as elder to get access to and abuse her then next 12-13 years. His abuse of Nicole D began when she was about seven with him forcing her to have oral sex. Watchtower did not help the children.

A document appears for **Massachusetts: Suffolk**, SS; Superior Court Civil Action No: 02-5765-C. It is notice of a lawsuit by **Leon and Robin Beal** on behalf of a minor daughter against **Ronald Broad and William Broadard** of **Ashmont Congregation at Columbus Park** and Watchtower et al.

A document for the plaintiffs said, "in this case, do not need ratification to create an agency relationship. Elders are appointed directly by the Watchtower Defendants and serve at their behest. (See Exhibit B, The Watchtower Defendants answer in Federal Court in a matter styled NO. CS-02-0190-WFN; Erica Rodriguez, vs. Watchtower Bible and Tract Society of New York, Inc., et al; In the United States District Court for the Eastern District of Washington). Plaintiffs alleged the Watchtower Defendants not only knew about this abuse, but continued to appoint their agent to positions where the abuse could continue and also intentionally acted to prevent the reporting and disclosure of their agents' abuse. They thereby ratified it by their own conduct."

Other documents are cited regarding Erica Rodriguez' lawsuit against child molester **elder Manuel Beliz**, Othello North Spanish Congregation in Washington, and Watchtower. **Elders John White, Carlos Chicas and Malendez** are mentioned with it. Documents from **J.R. Brown**, Director, **Public Affairs Office (718) 560-5600 for the Watchtower** were presenting saying Watchtower abhors child molestation. **Another Watchtower phone number given was (718) 560-5600 or fax (718) 560-5619.**

Napa Congregation of JWs it was noted could be served through its agent of process **Benjamin Hernandez** at 343 E. Thompson Avenue, Sonoma, CA 95476; Oak Knoll Congregation in Napa could be served via David Becker of 1034 Darms Ln, Napa, CA 94558, etc. The Watchtower alter ego defendants were to be known as Watchtower Defendants. They said **elders Cummins and Shelburn Of North Congregation of Red Bluff** had submitted declarations or affidavits setting forth that Judicial Committee exist mostly to spiritually assist erring members. Watchtower attorney **Mario F. Moreno** in an October 14, 2005 letter asked that his letters to the Red Bluff congregation's elders not be admitted as protected because he was acting as an attorney. Track One cases had completed depositions of many including **elders James Badger, LeRoy Reid, Bill Mullins and Ronald Pitts; depositions scheduled for Craig Hellberg and Nathan Dotta.** Completed Non-Tract One Case deposition were of elders **Gary Hays, Paul Photenhauer, Art Almanza, Eddie Johnson; plaintiffs Ken L,** Tabitha H, Charissa W; no depositions of perpetrators as two were dead and one missing or dead.

Aug 15, 2006 **Greg Love** (victims' attorney of Love & Norris law firm) went to Redding to conduct deposition of **elders Billy Jack Mullins Sr, LeRoy Martin Reid Jr and Ronald Pitts.** Watchtower's attorney Schnack persistently told the three to say nothing under claim of clergy-penitent privilege. Love writes "The attorney for the Watchtower defendants was instructing his client not to answer, contrary to the California Evidence Code."

Ron Pitts was asked about **circuit overseer Paul Pierre, Clint Willingham, Craig Hellberg; also Mary Ward.** He did recall elders Bodie Lyons and Leroy Reid Jr. Schnack told him not to talk about James Henderson and not to answer if "aware of the fact that James Henderson and" a then mere boy at the boy's home "would do their book studies, and then James Henderson would engage him in masturbation." In another document it was heard **Alvin (Blanchard) Heard** molested JW kids for over thirty years and after leaving California kept molesting in S Dakota and Oregon. Subsequent to 1981 he had molested in **Oroville and at Paradise, CA.** Plaintiffs noted such information was relevant but Watchtower kept telling elders to not speak. Watchtower Defendants also objected to giving information about appointment or deletion of Alvin Heard, his brother **James, his uncle Howard,** and James Henderson.

In deposition JW pedophile Alvin Blanchard Heard said in South Dakota he told the **elders including Roger Kelly and Steve Taylor** that he was a child molester. At **Altamont** the elders warned his JWs niece and nephew and two **elders including Mark Durr** spoke with him. Also from S Dakota Roger Kelly had already informed Altamont elders by letter that he was a pedophile. At **Susanville,** Heard knew **elder Dennis Thompson** knew he was a pedophile as Thompson had handled a judicial committee case involving Heard when they were at Paradise; he also knew Thompson had spoken about him with **presiding overseer Glen Strahan.** Heard

had also been at Oroville. He and wife Hazel had also lived in Chico. While in Paradise he confessed to elders he had molested children when in Oroville: a boy and three girls. There others he said he didn't molest but did "touch inappropriately." He and his wife separated twice at Paradise. Once she went to Sacramento, the second time to **Chico**.

Watchtower attorney or personnel emails include hhampton@FHL-Law.com; that of victims' attorney Greg Love is gslove@airmail.net. Plaintiffs asked the judge to order for deposition a person more knowledgeable than **Gary N. Breaux** of Watchtower's legal department as he lacked information he said only the legal department has. (As said, plaintiffs had said a deposition from Don Adams, the President of the oldest most important corporation in Pennsylvania was most wanted.)

A written deposition of **J Gary Hayes of Esparto and an elder of the S Congregation of JWs** in Woodland said elders must keep confidential confessions they hear from courts so JWs won't worry what they say might later come out in court; that he and another elder did meet with pedophile **Tim Silva** to give spiritual counsel and assistance. **Elder Arturo Almanza** of N Congregation of JWs in Woodland and former elder in S Congregation in Woodland also in written deposition said he and two other elders met with Silva then since the pedophile was a ministerial servant to sent a report for review by Watchtower headquarters. **William E Blore an elder** of W Congregation of JWs in **Colfax, CA**, deposed saying he and other elders met with **elder Albert Harriman** several times in 1987 then reported him to Watchtower headquarters. **Elder David W Becker of River Park Congregation** in Napa deposed and as with the other elders emphasized JW elders keep matters private but he and two other elders did meet with Edward Villegas in 1994 then reported him to elders in the US Service Department. **Arvid W Kron elder in Oak Knoll Congregation of JWs in Napa** deposed; he had also been an elder in W Congregation in Napa 1972-1991; he said mature elders must not even discuss matters with their wives then disclosed he was among those meeting with Villegas. **David W Becker** elder of River Park Congregation in Napa stressed confidentiality then told he was one of the elders who had met with Villegas. A different document by an attorney noted Villegas had begun molesting JW children about 1972, abusing Charissa W then and Nicole D in about 1978.

Schnack told the court if it made Watchtower attorneys like Mario Moreno provide legal documents then Watchtower should be allowed to turn around and make the plaintiffs' attorney do the same. **The Honorable Raymond A. Guadagni** ruled against Watchtower noting plaintiffs didn't ask to depose a Watchtower attorney and they could get testimony from non-attorney experts with Watchtower's legal department. Plaintiffs seek to see how already produced document are created and use, documents already produced by Watchtower Defendants.

A document for the plaintiffs noted the secrecy promulgated by Watchtower Defendants was such that the Service Department (headed by Theodore Jaracz who came on the Governing Body in 1974; and was once alleged to have himself been a molester by Pat Garza now deceased) had elders make anonymous calls from telephone booths to report abuses in states requiring a report, doing so from the booths so that law enforcement authorities would be unable to contact them for more information.

James Henderson was “a predator” from at least 1965 but appointed and reappointed as elder and ministerial servant, allowed to move to other congregations where doing more persions and abuse; on July 14, 1964 Clearlake Highland Congregation wrote the Service Department of Watchtower in NY saying he sodomized a drunken JW. It was received by Watchtower "desk man" agent **Merton Victor Campbell** who recognized him as a danger, but eight years later Campbell as managing agent for Watchtower appointed Henderson as an elder in the **Ukiah congregation**. Henderson moved to **Yuba City**, was reappointed elder, removed about 1974 after confessing to doing "some perverted things with two young men. Even his wife was not told the reason he was reproved. The Jehovah's Witnesses practice was, and remains, that members can be disciplined secretly and even their spouses are not told the reason. However, according to the policies of the WATCHTOWER DEFENDANTS, the service department would have received a report."

He moved and a Watchtower letter telling of him followed; in the 1970s he was removed as elder or ministerial servant by a congregation in the Maryville area for sex abuse and another report sent to the Service Department. On January 21, 1981, **Upper Lake Congregation** wrote to **Red Bluff Congregation** saying they had considered appointing him as a ministerial servant, mentioning nothing of his criminal past. James Henderson became an elder there and on November 23, 1988, was appointed Red Bluff City Overseer. About then an elder or ministerial servant of Red Bluff South Congregation got and ignored a report Henderson had molested a young boy at Henderson' place of work. On October 20, 1992, a young man called an elder at Red Bluff congregation, said Henderson had molested him and he had a confession the elder had signed admitting to abusing him and others. When he offered to meet and give that elder a copy of the confession, the elder rejected the offer and told him not to contact him again.

Another Henderson victim went to the police in 1994, so Henderson confessed to elder Bodie Lyon. Watchtower Defendants again tried to just give the elder a slap on the wrist reproof until information about other victims was brought to their attention and the Red Bluff police. Henderson was only then disfellowshipped. So at least five times 1963-93 when he started abusing Tim W the Watchtower Defendants go reports of Henderson's committing a sex crime. In 1993 they knew he was dangerous but negligently let him have unsupervised access to Tim W and he preyed on him till 1994.

In late December 2006 the court received a request to add on against Watchtower Defendants plaintiffs called **A.B., G.G., N.H. and S.H.**, a minor, by and through their Mother **S.A.H.** Guardian Ad Litem and mother, S.A.H.who were also suing wanted fugitive **Frederick McLean** who committed sex abuses 1993-99. Watchtower Defendant attorney Schnack called this add-on unfair. Presently there was an out-of-court settlement for all these cases.

<http://www.dos.state.pa.us/corps/lib/corps/20/7/1977-5977.pdf>

<http://www.dos.state.pa.us/corps/cwp/view.asp?a=1093&Q=431210&corpsNav=|>

The documents mention the following **Betty Hopkins** the mother of victim Charissa, Marsha Villegas the wife of pedophile JW elder Edward Villegas,

