

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

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DEBORAH HINES,

Plaintiff,

-against-

WATCHTOWER BIBLE AND TRACT SOCIETY OF  
NEW YORK; THE GOVERNING BODY OF JEHOVAH'S  
WITNESSES; and JOHN AND JANE DOES 1-10 as  
priests, clergy, staff, and administrators whose names are  
unknown to the Plaintiff,

Defendants.

-----X

Plaintiff designates Kings County  
as the place of trial.

Index No.

**SUMMONS**

The venue is based on a substantial  
part of the events and/or omissions  
giving rise to claims occurring  
within Kings County.

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: San Diego, CA  
August 13, 2021

THE ZALKIN LAW FIRM, P.C.

/s/ Irwin Zalkin  
IRWIN M. ZALKIN, ESQ.  
*Attorney for Plaintiff*  
10 Times Square  
1441 Broadway, Suite 3147  
New York, NY 10018  
(858) 259-3011

Defendants' Addresses:

Watchtower Bible and Tract Society of New York, Inc.  
1 Kings Drive  
Tuxedo Park, NY 10987

The Governing Body of Jehovah's Witnesses  
1 Kings Drive  
Tuxedo Park, NY 187

John and Jane Does 1-10  
Addresses Unknown

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
DEBORAH HINES,

PLAINTIFF,

-against-

Index No.

**VERIFIED COMPLAINT**

WATCHTOWER BIBLE AND TRACT SOCIETY OF  
NEW YORK; THE GOVERNING BODY OF JEHOVAH'S  
WITNESSES; and JOHN AND JANE DOES 1-10 as  
priests, clergy, staff, and administrators whose names are  
unknown to the Plaintiff,

Defendants.

-----X

Plaintiff, by her attorneys, THE ZALKIN LAW FIRM, P.C., upon information and belief  
and at all times hereinafter mentioned, respectfully alleges as follows:

**PARTIES**

1. The plaintiff, DEBORAH HINES (hereinafter "HINES") is a resident of the State  
of Texas. At all times relevant, Hines was known as Deborah Vollmer or Deborah Briggs.

2. This complaint is brought pursuant to the Child Victims Act, which provides a  
right of action for victims of childhood sexual abuse that would otherwise be time-barred.

3. Defendant WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK  
("WATCHTOWER") was and is a not-for-profit religious corporation, organized and existing  
under and by virtue of the laws of the State of New York.

4. At the time of the acts giving rise to the causes of action alleged in this complaint,  
WATCHTOWER's principal office and place of business was in the County of Kings, State of  
New York.

5. During all times relevant hereto, WATCHTOWER's certificate of incorporation  
listed Kings County as its principal place of business.

6. The acts and omissions forming the basis for this complaint took place in the

State of New York.

7. DEFENDANT THE GOVERNING BODY OF JEHOVAH'S WITNESSES (hereinafter "GOVERNING BODY") was and is a business or religious entity of unknown legal status.

8. GOVERNING BODY is comprised of eight members and claims to have formal president or secretary. However, upon information and belief, GOVERNING BODY does have a coordinator that was formerly referred to as a chairman.

9. Upon information and belief, the coordinator of GOVERNING BODY rotates on a yearly basis in alphabetical order.

10. The current members of the Governing Body are KENNETH E. COOK, JR.; SAMUEL FREDERICK HERD; GEOFFREY WILLIAM JACKSON; MARK STEPHEN LETT; GERRIT LOSCH; ANTHONY MORRIS III; D. MARK SANDERSON; and DAVID H. SPLANE.

11. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is D. MARK SANDERSON.

12. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is DAVID H. SPLANE.

13. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is KENNETH E. COOK, JR.

14. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is SAMUEL FRERICK HERD.

15. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is GEOFFREY WILLIAM JACKSON.

16. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is MARK STEPHEN LETT.

17. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is GERRIT LOSCH.

18. Upon information and belief, the current coordinator of GOVERNING BODY, as of October 1, 2019, is ANTHONY MORRIS, III.

19. At the time of the acts giving rise to the causes of action alleged in this complaint, GOVERNING BODY's principal office and place of business was in the County of Kings, State of New York.

20. Defendants DOES 1-10 are persons or entities with responsibilities for Plaintiff's safety, supervision and/or placement in foster care, who have not to date been identified. Plaintiff has made a diligent effort to identify these Defendants prior to the filing of this Complaint and has been unable to do so.

#### **OTHER RELEVANT ENTITIES**

21. Christian Congregation of Jehovah's Witnesses (hereinafter "CCJW") was and is a not-for-profit religious corporation organized and existing under and by virtue of the laws of the State of New York.

22. In or about April of 2001, CCJW assumed from WATCHTOWER the obligation to operate the Service Department of the United States Branch of Jehovah's Witnesses, and became WATCHTOWER'S successor in interest.

23. CCJW paid no consideration to WATCHTOWER in exchange for its assumption of control over the Service Department, and the Service Department did not change location, staffing, or operation.

24. CCJW continues to operate the Service Department.
25. CCJW is a successor of WATCHTOWER.
26. WATCHTOWER merged into CCJW.

### **BACKGROUND**

27. The organizational structure of the Jehovah's Witnesses is hierarchical.
28. At all times relevant, the world headquarters for WATCHTOWER was located in Brooklyn, NY in a facility known as Bethel.
29. The organizational head of the Jehovah's Witnesses was and is GOVERNING BODY.
30. GOVERNING BODY is composed of a fluctuating number of elders.
31. Authority flows downward from GOVERNING BODY to the local level of the Jehovah's Witness organization, which is made up of congregations.
32. At all times relevant, the members of the GOVERNING BODY lived at Bethel. The GOVERNING BODY conducted all official Jehovah's Witness business at and from Bethel.
33. At all times relevant, several other Jehovah's Witness members also lived and worked at Bethel.
34. Upon information and belief, all members who lived and worked at Bethel were authorized by GOVERNING BODY and WATCHTOWER to serve and work at Bethel.
35. Upon information and belief, GOVERNING BODY and WATCHTOWER had the authority to approve members to live and work at Bethel.
36. Upon information and belief, GOVERNING BODY and WATCHTOWER had the authority to discipline members who were living and serving at Bethel.
37. Upon information and belief, GOVERNING BODY and WATCHTOWER had

the ability to control the day to day lives of those serving at Bethel, including directing room assignments for living and sleeping.

38. Some members who lived, worked, and served at Bethel did so with their families.

39. Congregations are organized by circuit.

40. A circuit consists of some number of congregations.

41. Each circuit is staffed by a circuit overseer and/or a substitute circuit overseer.

42. It is the responsibility of the circuit and district overseer to ensure that directives and policies promulgated by GOVERNING BODY and WATCHTOWER are being followed and correctly implemented at the congregation, circuit and district levels.

43. The circuit overseer personally visits each congregation within his circuit twice yearly.

44. The circuit overseer personally meets with the elders of the congregations within his circuit.

45. During the circuit overseer's visits, the elders of the congregation and the circuit overseer discuss the overall functioning of the congregation, as well as specific instances of alleged wrongdoing, including allegations of child molestation.

46. The circuit overseer participates in field service and observes and reports upon the functioning of the congregation.

47. During the circuit overseer's visits, the elders of the congregation and the circuit overseer meet to discuss the men in the congregation, with the purpose of identifying men who meet the requirements for appointment as ministerial servants or elders.

48. The circuit overseer assists the elders in arriving at recommendations to

defendant WATCHTOWER for appointment as ministerial servants and elders in the congregation.

49. Prior to April of 2001, circuit overseers prepared reports regarding their visits to the congregations and submitted the report to WATCHTOWER.

50. Since April of 2001, circuit overseers have submitted their reports to CCJW.

51. Day to day operations of each congregation are run by a body of elders.

52. Women are not permitted to serve as elders.

53. The elders are the highest authority at the congregational level.

54. The responsibilities of the elders include directing door-to-door preaching activities, selecting potential candidates for the positions of ministerial servants or elders, organizing weekly church meetings, selecting candidates for the position of publisher, handling finances for the congregation, and determining the guilt, repentance, and punishment of church members who commit wrongdoing.

55. In order to be appointed as an elder, a person must be a ministerial servant in good standing or have served as an elder in another congregation.

56. When the local elders identify a candidate for the position of elder, the circuit overseer recommends the candidate to WATCHTOWER.

57. WATCHTOWER and GOVERNING BODY have ultimate authority over the appointment of any candidate to the position of elder.

58. In the spring of 2001, CCJW took over WATCHTOWER'S responsibilities for the appointment of elders.

59. CCJW also assumed the responsibility from WATCHTOWER of nominating, appointing, supervising and disciplinary publishers, ministerial servants, pioneers, elders, and

circuit overseers.

60. CCJW assumed the responsibilities described in paragraph 61 in order to evade liabilities of WATCHTOWER for negligence in carrying these responsibilities.

61. The WATCHTOWER substantially merged into CCJW.

62. Baptized publishers who meet certain requirements may be appointed as ministerial servants.

63. Ministerial servants serve the congregation and aid the elders in their responsibilities and take on leadership responsibilities in the absence of an elder.

64. In order to be appointed as a ministerial servant, a person must be a publisher in good standing.

65. Only males may serve as ministerial servants.

66. The body of elders of the local congregation identifies potential candidates for the position of ministerial servant.

67. The body of elders in concert with the circuit overseer, determines whether a potential candidate for ministerial servant is suitable, and lives his life in accordance with appropriate morals.

68. Recommendations for the appointment of any individual to the position of ministerial servant are made to the WATCHTOWER.

69. WATCHTOWER and GOVERNING BODY have the ultimate authority as to whether a candidate is elevated to the level of ministerial servant.

70. Membership in the Jehovah's Witness organization is strictly registered and monitored.

71. A person can attend open meetings at the Kingdom Hall for years, and not be a

member of the congregation.

72. An individual who wishes to become a member of the Jehovah's Witnesses, begins the process by engaging in a period of bible study with a baptized member of the congregation, along with self-study.

73. After months of study, a person may become an unbaptized publisher.

74. In order to become an unbaptized publisher, the aspirant must apply to the congregation's body of elders.

75. The body of elders determine whether the aspirant exhibits sufficient knowledge of the beliefs and organization of the Jehovah's Witnesses to become a baptized publisher.

76. The body of elders determine whether the morals and ethics of the aspirant meet the Jehovah's Witnesses standards.

77. Once a person is approved as an unbaptized publisher, he or she is authorized to represent the Jehovah's Witnesses, and the specific congregation, in the community.

78. An unbaptized publisher is authorized to engage in field service, which is the centerpiece of Jehovah's Witness marketing, fundraising, and recruiting activities.

79. Field service involves door-to-door proselytizing.

80. By participating in field service, an unbaptized publisher is authorized by the congregation and by the Jehovah's Witness organization to distribute Jehovah's Witness literature to members of the community, to accept donations on behalf of the organization, and to invite prospective members of the community to attend open congregation meetings at the Kingdom Hall as a means of recruitment.

81. Prior to April of 2001, each publisher was instructed by the congregation, as directed by defendant WATCHTOWER, on how to become more effective at disseminating

literature, receiving donations, and enticing non-members to attend public congregation meetings or begin bible study.

82. Since April of 2001, CCJW has assumed WATCHTOWER'S responsibilities for improving publisher's presentations.

83. Publishers must submit monthly records to the congregation detailing their hours spent in field service.

84. Publishers must submit forms to the congregation secretary for each "bible study" conducted by a publisher during the month.

85. Failure to submit field service records can lead to a publisher being designated as "irregular" or "inactive", which results in lowered status within the congregation.

86. After additional study, an unbaptized publisher may seek to become a baptized publisher.

87. Baptism as one of Jehovah's Witnesses is considered an ordination as minister of the Jehovah's Witnesses.

88. To be approved for baptism, an applicant must be tested and approved by elders of the local congregation.

89. During the testing, the applicant is asked certain questions relating to the teachings of the Jehovah's Witnesses as well as the organizational structure of the Jehovah's Witnesses.

90. Baptized publishers may make a greater commitment by pledging to spend a specified number of hours in service for a period of time.

91. Pioneers are baptized publishers who have pledged to perform a specified number of hours of field service.

92. An auxiliary pioneer is a baptized publisher who applies to the congregation's elders to perform a certain number of hours of field service during a one-month period of time.

93. The elders have discretion to accept or reject an application for auxiliary pioneer.

94. A regular pioneer is a baptized publisher who pledges to spend a specified number of hours in field service each month for one year.

95. In order to become a regular pioneer, an applicant gains the recommendation of the congregation's elders, who in turn submit that recommendation for approval to WATCHTOWER.

96. WATCHTOWER has the discretion to approve or reject an application for regular pioneer.

97. Since April of 2001, CCJW has assumed responsibility for approving or rejecting applications for regular pioneers.

98. Publishers submit to the domination and control of the Jehovah's Witness organization.

99. The Jehovah's Witness organization monitors each publisher's field service and bible study records, standardizes methods to be used during proselytizing activities, provides the only approved literature to be distributed during field service, directs where publishers will perform field service, controls access to sought after positions as regular or auxiliary pioneers, and determines appointments as ministerial servants, elders, and overseers.

100. The Jehovah's Witness organization dictates and implements the Jehovah's Witness practice of shunning, which involves isolating and not interacting with members that have been disfellowshipped or have voluntarily left the church.

101. A publisher's personal grooming, appearance and dress are regulated by his or

her congregation.

102. A publisher's use of alcohol, tobacco, or drugs is regulated by his or her congregation.

103. A publisher's illegal sexual conduct, such as child sexual abuse occurring away from Jehovah's Witness locations and events are subject to regulation and the imposition of punishment by the congregation.

104. A publisher's legal sexual conduct is subject to regulation and the imposition of punishment by the congregation.

105. Congregants are encouraged to bring problems to the elders to be resolved and are discouraged from seeking intervention from outside of the Jehovah's Witness organization.

106. When a congregant commits an act of wrongdoing, such as the sexual abuse of a child, that matter must be brought to an elder to be resolved.

107. Jehovah's Witness policy requires elders to investigate allegations of sexual abuse of a child.

108. It is the policy of the Jehovah's Witness organization that if there are two witnesses to any alleged sexual abuse of a child, a judicial committee will be convened.

109. It is the policy of the Jehovah's Witness organization that if there are not two witnesses to any alleged sexual abuse of a child, and the accused denies any wrongdoing, the accused is determined to be innocent, and no corrective, protective or punitive action is taken by the congregation.

110. If a judicial committee is convened to investigate an allegation of sexual abuse of a child, the two original elders who investigated the wrongdoing will be joined by a third elder, who will hear the case and impose punishment upon the wrongdoer.

111. Potential punishments for sexual abuse of a child include private reproof, public reproof, and disfellowship.

112. Private reproof in the Jehovah's Witness organization means a private censorship of the wrongdoer that generally results in a limitation of privileges to engage in field service for a short period of time.

113. The congregation is not informed when an individual is subject to private reproof.

114. In the Jehovah's Witness organization, public reproof means an announcement is made to the congregation that the individual has been reproved by a judicial committee and found to be repentant.

115. Disfellowship is expulsion from the Jehovah's Witness organization.

116. When an individual is disfellowshipped, an announcement is made to the congregation that he or she is no longer one of Jehovah's Witnesses.

117. When an individual is disfellowshipped, the congregation is not informed of any acts of wrongdoing, or of the basis for the person's expulsion from the Jehovah's Witness organization.

118. A person who is disfellowshipped may seek reinstatement into the Congregation by written request to the elders.

119. At all times prior to April of 2001, WATCHTOWER operated the Service Department of the United States branch of Jehovah's Witnesses.

120. Through the Service Department, WATCHTOWER implemented the policies and procedures promulgated by GOVERNING BODY.

121. WATCHTOWER exercised control over the day-to-day operations and activities of local congregations.

122. Prior to April of 2001, WATCHTOWER published a series of handbooks that were distributed to elders.

123. The aforesaid handbooks were not disclosed to other Jehovah's Witnesses or the public.

124. The aforesaid handbooks provided general instructions to elders regarding day-to-day administration of the organization.

125. The aforesaid handbooks provided instructions to elders regarding how to respond to allegations of wrongdoing, including child molestation.

126. The aforesaid handbooks specified the actions elders were required to take upon learning of child molestation within their congregations.

127. Prior to April of 2001, WATCHTOWER provided periodic instruction to local congregations through letters addressed to All Bodies of Elders.

128. The aforesaid letters covered a broad spectrum of topics ranging from standardizing the record-keeping practices of all congregations, establishing procedures for ordering literature from defendant WATCHTOWER, remitting payments, handling administrative and procedural matters involving day-to-day congregation operations.

129. Some of the aforesaid letters provided specific instructions on how to respond to wrongdoing within the congregation, including child molestation.

130. CCJW assumed responsibility for disseminating some of these letters on and after April of 2001.

131. WATCHTOWER, through its Writing Department, and prior to April of 2001, through the Service Department, researches, writes, approves, publishes, and distributes its own materials for distribution to actual and prospective Jehovah's Witnesses.

132. WATCHTOWER appointed circuit and district overseers.
133. WATCHTOWER directly reviewed recommendations of prospective elders.
134. WATCHTOWER directly reviewed recommendations of ministerial servants.
135. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of elder.
136. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of ministerial servant.
137. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of district or circuit overseer.
138. WATCHTOWER established procedures for the discipline of members accused of wrongdoing.
139. WATCHTOWER received and maintained records regarding the disfellowship or reproof of elders and ministerial servants.
140. In March of 1997, WATCHTOWER disseminated a letter to all of the Bodies of Elders in United States congregations seeking information on men who then served, or had previously served, in any appointed position (e.g., elder, ministerial servant, regular pioneer) and were also known to have engaged in child molestation.
141. WATCHTOWER required each congregation to prepare reports detailing instances of child molestation, and to return the reports to WATCHTOWER's Service Department.
142. In July of 1998, defendant WATCHTOWER sent a follow up letter to each United States congregation, reminding those bodies of elders of the need to send the reports, and possible legal consequences of appointing a known child molester to a position of trust, such as an elder or ministerial servant.

143. Reports regarding the sexual abuse of children were received by the Service Department and kept by defendants WATCHTOWER and GOVERNING BODY.

144. Prior to receiving the written reports, WATCHTOWER and GOVERNING BODY were aware that child molestation by elders, ministerial servants, and publishers was a problem within its congregations.

145. Despite receiving the written reports, WATCHTOWER and GOVERNING BODY did not promulgate new or effective policies for preventing or responding to child molestation.

146. Despite receiving the written reports, WATCHTOWER and GOVERNING BODY did not implement procedures or policies to educate children and adult members of the risk of child molestation within the Jehovah's Witness organization, how to identify warning signs of molestation, or how to avoid dangerous situations.

147. CCJW assumed operation of the Service Department, and gained possession and knowledge of the molestation reports, and also received new reports of molestation by Jehovah's Witnesses.

148. Reports of sexual molestation continue to be sent to CCJW.

149. A policy letter from July 1989 required elders to contact defendant WATCHTOWER's Legal Department about child abuse, instead of contacting the police.

150. WATCHTOWER and GOVERNING BODY left that policy intact, even after receiving written reports of molestation.

151. WATCHTOWER's Service Department has never made a mandated child abuse report to law enforcement.

152. The policies on child molestation promulgated by WATCHTOWER and

GOVERNING BODY through the secret elder handbooks and confidential policy letters were not divulged to Jehovah's Witness members.

153. Through this mandated secrecy regarding child molestation by elders, ministerial servants, and publishers, WATCHTOWER and GOVERNING BODY intentionally concealed the threat of child molestation within the Jehovah's Witnesses from their members.

154. Through policies of non-reporting to law enforcement and non-cooperation with criminal child molestation investigations, defendants WATCHTOWER and GOVERNING BODY protected accused and admitted child molesters from criminal prosecution and thereby increased the risk of molestation of minors.

#### **JURISDICTION AND VENUE**

155. This action is timely commenced pursuant to the New York State Child Victims Act, pursuant to CPLR § 214-g.

156. This Court has jurisdiction pursuant to CPLR § 301 as WATCHTOWER conducted business in the County of Kings, State of New York at all times relevant herein.

157. Venue is proper pursuant to CPLR § 503 because a substantial portion of the injuries or omissions giving rise to this action occurred in the County of Kings, State of New York.

#### **BACKGROUND FACTS RELATED TO PLAINTIFF**

158. PLAINTIFF was raised a member of the Jehovah's Witnesses. She primarily attended meetings at various congregations in Arizona.

159. PLAINTIFF became a Pioneer in approximately 1987 or 1988.

160. Plaintiff's stepfather, William Briggs ("Briggs") was employed by WATCHTOWER and GOVERNING BODY to produce videos at Bethel. Due to his position, Plaintiff and her family split their time between Arizona and New York. Plaintiff and her family

would spend three months in New York, where they lived at Bethel, then return back to Arizona for one month, and then go back to New York for three months, and so on and so forth.

161. WATCHTOWER and GOVERNING BODY assigned elder Ted Adams as Briggs' Overseer while at Bethel.

162. From approximately 1982-1988, when PLAINTIFF was approximately 10-16 years old, PLAINTIFF suffered horrific sexual abuse by Briggs.

163. The sexual abuse occurred three to five times per week, and included, but was not limited to, sodomy, rape, forced oral copulation, and Briggs urinating in Plaintiff's mouth.

164. While at Bethel, Plaintiff was assigned to work various jobs, including, assisting with video production, working in the laundry facility, and as an elevator operator.

165. While at Bethel, Plaintiff was assigned by WATCHTOWER and GOVERNING BODY to live in the same room as her mother and Briggs.

166. At all times relevant, Plaintiff's mother suffered from alcoholism. While Plaintiff's family was living at Bethel, Plaintiff's mother would frequently consume alcohol to the point of incapacitation. Once she was incapacitated, Briggs would sexually abuse Plaintiff in their room at Bethel.

167. In approximately 1986, Plaintiff reported her sexual abuse to Michael Filla, an Elder who worked at Bethel. Mr. Filla did nothing in response. Briggs' sexual abuse of Hines continued at Bethel after Hines' report to Mr. Filla.

168. A couple weeks after reporting to Mr. Filla, Plaintiff reported her abuse to Ted Adams, an Elder at Bethel, the Overseer of all video projects at Bethel, and the elder who WATCHTOWER and GOVERNING BODY assigned to oversee Briggs while Briggs was at Bethel. Mr. Adams told Plaintiff that she should not talk about her abuse with anyone. Mr.

Adams was removed as an Overseer shortly thereafter. Briggs' sexual abuse of Hines continued at Bethel after Hines' report to Mr. Adams.

169. Plaintiff then reported her abuse to Mr. Underwood, an Elder at Bethel and the Overseer of all international construction at Bethel. Mr. Underwood did nothing in response. Briggs' sexual abuse of Hines continued at Bethel after Hines' report to Mr. Underwood.

170. Plaintiff then reported to Jack Barr, an Elder and a member of the GOVERNING BODY at the time. Mr. Barr told Plaintiff that he would relay her report to the entire GOVERNING BODY. Briggs' sexual abuse of Hines continued at Bethel after Hines' report to Mr. Barr.

171. About one week after her report to Mr. Barr, Mr. Barr informed Plaintiff that the GOVERNING BODY had "taken care of it," that she should feel privileged for having the experiences that she had, that Briggs was too important to be disciplined because of his role in creating videos at Bethel, that they couldn't do anything about her abuse because Briggs had only admitted to digitally penetrating and not raping Plaintiff, and that if she continued to talk about her abuse, she would be stripped of her privileges as a Pioneer.

172. Following her report to Mr. Barr, Plaintiff was removed from her mother and stepfather's room at Bethel. Plaintiff was told that Briggs would not be told why Plaintiff was being removed from his room.

173. Upon information and belief, Briggs was told that Plaintiff was removed from his room due to her accusations that he was sexually abusing her.

174. Briggs' sexual abuse of Plaintiff continued when they returned to Arizona. Based on information and belief, while in Arizona Briggs escalated his behavior, including by physically abusing Hines, in retaliation for Plaintiff's aforementioned reports.

175. In or around 1987, Plaintiff reported her ongoing sexual abuse to LOSCH. LOSCH responded that it had been handled, that Briggs was sufficiently repentant, and that Plaintiff should not talk to anybody else about the abuse anymore.

176. Following Plaintiff's report to LOSCH, Briggs continued to sexually abuse PLAINTIFF at their home in Arizona.

177. Upon information and belief, Briggs was never disciplined by WATCHTOWER or GOVERNING BODY for admitting to sexually abusing Plaintiff.

178. Plaintiff ignored WATCHTOWER's and GOVERNING BODY's directive to keep quiet about her abuse and continued to report her abuse to several other Jehovah's Witness members, including several more elders.

179. As a result, WATCHTOWER and GOVERNING BODY retaliated against Plaintiff by removing her privileges as a Pioneer in 1991.

180. On the day that Plaintiff's privileges were removed, she was publicly reprimanded, and Briggs was elevated to the position of Elder.

181. Briggs' acts committed against Hines while she was a child are sexual offenses as defined by New York Penal Law 130.

**AS AND FOR A FIRST CAUSE OF ACTION  
(NEGLIGENT SUPERVISION)**

182. HINES repeats, reiterates, and realleges each and every allegation of this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

183. Briggs was, by virtue of his employment at Bethel, an agent of WATCHTOWER and GOVERNING BODY.

184. Briggs was acting within the scope of his employment or agency in performing duties for, and on behalf of WATCHTOWER and GOVERNING BODY.

185. WATCHTOWER and GOVERNING BODY knew or should have known that Briggs sexually abused children, including Hines, prior to the last instance of sexual abuse against Hines.

186. Hines was trained by WATCHTOWER and GOVERNING BODY, that she should obey, trust, and respect the individuals appointed to work at Bethel.

187. The sexual abuse by Briggs occurred using property that was owned, operated, and/or controlled by the Defendants, during which time Plaintiff was in the care, custody, or control of the Defendants.

188. WATCHTOWER and GOVERNING BODY did nothing to remove Briggs from his appointed position as Overseer.

189. WATCHTOWER and GOVERNING BODY had a duty to protect Hines, as a minor resident at Bethel, from Briggs' sexual criminal acts.

190. WATCHTOWER and GOVERNING BODY had a duty to competently supervise Briggs during the time he served at Bethel.

191. WATCHTOWER and GOVERNING BODY failed to adequately and competently supervise Briggs.

192. WATCHTOWER and GOVERNING BODY had a duty to protect Hines, as a minor congregant, from Briggs' sexual criminal acts.

193. WATCHTOWER and GOVERNING BODY had a duty to competently supervise Briggs during the time he served at Bethel.

194. WATCHTOWER and GOVERNING BODY failed to adequately and competently supervise Briggs.

195. Briggs' sexual abuse of Hines was proximately caused by the defendants' failure

to adequately and competently supervise Briggs.

196. The aforementioned occurrences of sexual abuse were caused by the negligence, carelessness, and recklessness and the willful, wanton, reckless and grossly negligent conduct of WATCHTOWER and GOVERNING BODY, and their agents, servants, and/or employees, in failing to properly and adequately supervise the conduct of Briggs as it related to Hines.

197. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

198. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

199. By reason of the foregoing, WATCHTOWER and GOVERNING BODY are also liable to Hines for punitive and exemplary damages.

200. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

201. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION  
(NEGLIGENT RETENTION)**

202. Hines repeats, reiterates, and realleges each and every allegation of this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

203. Prior to and all times herein mentioned, WATCHTOWER and GOVERNING BODY knew or should have known of Briggs' aforementioned conduct toward Hines and/or his

propensity to sexually abuse minors such as Hines, and yet they maintained his employment as their agent.

204. It was reasonably foreseeable that Briggs would sexually abuse minors such as Hines.

205. WATCHTOWER and GOVERNING BODY undertook a duty to protect minor congregants, like Hines, who came to live and work at Bethel.

206. The sexual abuse by Briggs occurred using property that was owned, operated, and/or controlled by the Defendants, during which time Plaintiff was in the care, custody, or control of the Defendants.

207. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

208. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

209. By reason of the foregoing, WATCHTOWER, GOVERNING BODY are also liable to Hines for punitive and exemplary damages.

210. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

211. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A THIRD CAUSE OF ACTION  
(NEGLIGENT FAILURE TO TRAIN, RELATING TO CHILD ABUSE)**

212. HINES repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

213. WATCHTOWER and GOVERNING BODY knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses.

214. WATCHTOWER and GOVERNING BODY and their agents, servants, and employees, had a duty to establish adequate, competent, and effective professional training and education programs and procedures for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by elders, ministerial servants, and other agents, like Briggs, who came into contact with minor congregants as a result of their positions within the Jehovah's Witness organization.

215. WATCHTOWER and GOVERNING BODY, and their agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like Hines.

216. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

217. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

218. By reason of the foregoing, WATCHTOWER and GOVERNING BODY are also

liable to Hines for punitive and exemplary damages.

219. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

220. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A FOURTH CAUSE OF ACTION  
(NEGLIGENT UNDERTAKING)**

221. Hines repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

222. WATCHTOWER and GOVERNING BODY, and its agents, servants, and employees, knew or should have known that Briggs had been accused of engaging in child molestation prior to the conclusion of his molestation of Hines, and that he posed a likely impending harm to Hines.

223. Upon receiving Hines' report that she was being abused by Briggs, instead of reporting the abuse to the civil authorities, WATCHTOWER and GOVERNING BODY, by and through their agents, servants, and employees, undertook to respond to Hines' report.

224. In voluntarily undertaking to respond to Hines' report, WATCHTOWER and GOVERNING BODY had a duty to respond reasonably and competently.

225. WATCHTOWER and GOVERNING BODY breached their duty by failing to competently and reasonably respond to Hines' report.

226. But for WATCHTOWER's and GOVERNING BODY's failure to competently respond to Hines' reports, Hines would not have continued to suffer severe sexual abuse by Briggs.

227. WATCHTOWER's and GOVERNING BODY's breach was the proximate cause

of Hines' continued sexual abuse by Briggs.

228. By reason of the foregoing, Hines sustained physical and psychological injuries, including, but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, emotional and psychological damage as a result thereof, and some or all of these injuries are of a permanent and lasting nature, and Plaintiff has become, and will continue to be, obligated to expend sums of money for medical expenses.

229. That by reason of the foregoing, WATCHTOWER and GOVERNING BODY are also liable to Hines for punitive and exemplary damages.

230. It is hereby alleged pursuant to CPLR 1603 that the foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including but not limited to, CPLR 1602(7) and 1602(11).

231. That the amount of damages sought exceeds the jurisdictional limits of all lower courts, which would otherwise have jurisdiction.

**AS AND FOR A FIFTH CAUSE OF ACTION  
(INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS)**

232. Hines repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

233. WATCHTOWER and GOVERNING BODY knew, or in the exercise of reasonable care, should have known that their acts and omissions as described in this complaint would result in serious emotional distress to Hines.

234. WATCHTOWER and GOVERNING BODY acted with willful, wanton, reckless, intentional and deliberate disregard for the likelihood that Hines would suffer severe emotional distress as a direct and proximate result of the sexual abuse he endured.

235. WATCHTOWER's and GOVERNING BODY's conduct as alleged above was extreme and outrageous, and went beyond all bounds of decency.

236. As a direct and proximate result of WATCHTOWER's and GOVERNING BODY's acts and omissions, Hines suffered severe emotional distress.

237. As a result of WATCHTOWER's and GOVERNING BODY's conduct, Hines has and will become obligated to expend sums of money for medical treatment.

238. By reason of the foregoing, WATCHTOWER and GOVERNING BODY are also liable to Hines for punitive and exemplary damages.

239. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

240. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SIXTH CAUSE OF ACTION  
(NEGLIGENT FAILURE TO PROVIDE A SAFE AND SECURE ENVIRONMENT)**

241. Hines repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

242. WATCHTOWER and GOVERNING BODY assumed a duty to protect the safety and welfare of Hines, as more fully set forth above, when Hines was living at Bethel.

243. WATCHTOWER and GOVERNING BODY had a duty to provide a reasonably safe and secure environment for Hines, as a minor congregant, while she was participating in events, activities, and/or jobs at Bethel.

244. When Hines was in WATCHTOWER's and GOVERNING BODY's care, WATCHTOWER and GOVERNING BODY failed to provide a reasonably safe and secure

environment to Hines by failing to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.

245. The sexual abuse by Briggs occurred using property that was owned, operated, and/or controlled by the Defendants, during which time Plaintiff was in the care, custody, or control of the Defendants.

246. WATCHTOWER and GOVERNING BODY and its agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence in failing to provide a safe and secure environment for Hines while she, as a minor, living at Bethel, and as a result she was sexually abused by Briggs.

247. WATCHTOWER and GOVERNING BODY assumed a duty to protect the safety and welfare of Hines, as more fully set forth above, when WATCHTOWER and GOVERNING BODY invited and authorized Plaintiff and her family to live and work at Bethel.

248. WATCHTOWER and GOVERNING BODY had a duty to provide a reasonably safe and secure environment for HINES while she was participating in events, activities, and/or jobs at Bethel.

249. When Hines was in WATCHTOWER's and GOVERNING BODY's care, WATCHTOWER and GOVERNING BODY failed to provide a reasonably safe and secure environment to Hines by failing to exercise the degree of care that a reasonably prudent parent would have exercised under similar circumstances.

250. WATCHTOWER and GOVERNING BODY and their agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence in failing to provide a safe and secure environment for Hines while, she, as a minor, lived and worked at Bethel, and as a result she was sexually abused by Briggs.

251. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

252. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

253. By reason of the foregoing, WATCHTOWER and GOVERNING BODY are also liable to Hines for punitive and exemplary damages.

254. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

255. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SEVENTH CAUSE OF ACTION  
(SEXUAL ABUSE AND BATTERY)**

256. Hines repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

257. Each instance of Briggs' sexual misconduct and inappropriate physical contact with Hines constitutes a battery.

258. WATCHTOWER and GOVERNING BODY, by their intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted Briggs.

259. By declining to contact law enforcement about Briggs' molestation of Hines and others, WATCHTOWER and GOVERNING BODY sought to cover up Briggs' acts, and protect

him from detection or punishment, and thereby ratified his sexual molestation of Hines.

260. By directing Hines not to talk about her sexual abuse committed by Briggs, and by retaliating against Hines for continuing to discuss her sexual abuse committed by Briggs, WATCHTOWER and GOVERNING BODY sought to cover up Briggs' acts, and protect him from detection or punishment, and thereby ratified his sexual molestation of Hines.

261. WATCHTOWER and GOVERNING BODY ratified Briggs' sexual abuse of Hines by authorizing and approving Briggs to become an Elder, despite their knowledge that Briggs had horrifically and repeatedly sexually abused Hines for years when she was a child.

262. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

263. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

264. By reason of the foregoing, defendants are also liable to Hines for punitive and exemplary damages.

265. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

266. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR AN EIGHTH CAUSE OF ACTION  
(NEGLIGENCE)**

267. Hines repeats, reiterates, and realleges each and every allegation contained in this

complaint, inclusive, with the same force and effect as if fully set forth at length herein.

268. WATCHTOWER and GOVERNING BODY had a duty to protect Hines, a minor member of the Jehovah's Witnesses who was living at Bethel, from criminal sexual acts of third parties.

269. It was foreseeable that minors living at Bethel would be sexually abused by adults if they were placed in the same rooms together to live and sleep. In fact, WATCHTOWER and GOVERNING BODY had a specific policy to prohibit children from living and sleeping in the same room as adults at Bethel.

270. WATCHTOWER and GOVERNING BODY knew that Briggs sexually abused Hines at Bethel, a property owned and operated by WATCHTOWER and/or GOVERNING BODY.

271. WATCHTOWER and GOVERNING BODY breached their duty by assigning Hines to live and sleep in the same room as Briggs, and by failing to take immediate action to protect Hines from further abuse by Briggs after Hines reported her sexual abuse to several Bethel agents, volunteers, and/or employees.

272. But for WATCHTOWER's and GOVERNING BODY's breach, Briggs' sexual abuse of Hines would not have occurred.

273. WATCHTOWER's and GOVERNING BODY's breach was the proximate cause of Hines' sexual abuse by Briggs.

274. By reason of the foregoing, Hines sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

275. As a result of the defendants' conduct, Hines has and will become obligated to expend sums of money for medical treatment.

276. By reason of the foregoing, defendants are also liable to Hines for punitive and exemplary damages.

277. The foregoing cause of action is exempt from the operation of CPLR 1601 by reason of one or more of the exemptions provided in CPLR 1602, including, but not limited to, CPLR 1602(2)(iv), 1602(7) and 1602(11).

278. The damages exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Hines demands judgment against the defendants on each of the First, Second, Third, Fourth, Fifth, Sixth, and Seventh causes of action in a sum that exceeds the jurisdictional limits of all lower courts, including compensatory and punitive damages, together with interest, costs and disbursements pursuant to the causes of action herein.

Dated: San Diego, CA  
August 13, 2021

THE ZALKIN LAW FIRM, P.C.

/s/ Irwin Zalkin  
IRWIN M. ZALKIN, ESQ.  
*Attorney for Plaintiff*  
10 Times Square  
1441 Broadway, Suite 3147  
New York, NY 10018  
(858) 259-3011

STATE OF NEW YORK      )  
                              ) SS.:  
COUNTY OF NEW YORK    )

**VERIFICATION BY ATTORNEY**

IRWIN M. ZALKIN, an attorney being duly admitted before the courts of the State of New York, hereby affirms the following under penalties of perjury:

That he is an attorney for the PLAINTIFF in the above-entitled action with offices located at 10 Times Square, Suite 3147, New York, New York; that he has read the foregoing VERIFIED COMPLAINT and knows the contents thereof; that the same is true to his knowledge, except as to the matters stated to be alleged upon information and belief, and that as to those matters he believes them to be true.

That the reason why this verification is made by deponent instead of PLAINTIFF is because PLAINTIFF is not within the County of New York where deponent has his office. Deponent further says that the grounds of his belief as to all matters in the VERIFIED COMPLAINT not stated to be upon his knowledge are based upon conversations with the PLAINTIFF and other writings relevant to this action.

Dated: San Diego, CA  
August 13, 2021

THE ZALKIN LAW FIRM, P.C.

/s/ Irwin Zalkin  
IRWIN M. ZALKIN, ESQ.  
*Attorney for Plaintiff*  
10 Times Square  
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