

***Exhibit C***

ORIGINAL

**In the Matter Of:**

**JOHN DOE I v. WATCHTOWER BIBLE**

DC-14-12402

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**GARY BREAUX**

*May 29, 2015*

*Vol 1*

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1 which we served on Counsel, setting forth the legal  
2 basis for our objections.

3                   And if we can mark this as an exhibit and  
4 incorporate it into the record, that would be terrific.

5                   (Exhibit 2 marked.)

6           Q.     (BY MR. SCHULTE) And, Mr. Breaux, do you  
7 understand that, prior to your deposition today, even  
8 though this objection was filed, counsel for all parties  
9 withdrew those motions and objections to this deposition  
10 notice?

11                   MR. FEINBERG: Objection.

12                   MR. MILLER: No, that wasn't withdrawn.  
13 It was the other one that was withdrawn.

14                   MR. SCHULTE: All right. We can take that  
15 up with the Court.

16           Q.     (BY MR. SCHULTE) Did you bring any sort of  
17 documents responsive to what's marked as Exhibit A,  
18 aside from your driver's license?

19           A.     No, I did not.

20           Q.     Okay. What is your date of birth?

21           A.     January 21st, 1947.

22           Q.     January what?

23           A.     21st.

24           Q.     All right. How are you currently employed?

25           A.     I'm part of the Religious Order of Jehovah's

1 Witnesses.

2 Q. All right. How long have you been part of the  
3 Jehovah's Witness Religious Order?

4 A. I think 1986, since 1986 sometime.

5 Q. Okay. From 1986, currently, you have been  
6 part of the Religious Order of Jehovah's Witnesses?

7 A. Yes.

8 Q. All right. And is that part of the Service  
9 Department of the Watchtower Bible and Tract Society of  
10 New York?

11 A. Service Department is part of the Branch.

12 Q. All right. How long did you work for the  
13 Service Department?

14 A. I started in 1994.

15 Q. Are you currently an elder?

16 A. Yes, I am.

17 Q. All right. How long have you been an elder?

18 A. Over 40 years.

19 Q. Did you actually serve as a -- strike that.  
20 Did you actually serve as an elder of a  
21 congregation?

22 A. Yes, I did.

23 Q. During which years and which congregation?

24 A. I was in Jennings Congregation in St. Louis,  
25 Missouri. And let's see. Then I was in the -- I was a



1 circuit overseer, so you're not appointed as an elder in  
2 a particular congregation. 1994, when I was -- I came  
3 into New York, I was part of East Danbury, Connecticut,  
4 congregation. I've been there since.

5 Q. You're currently an elder of the East Danbury  
6 congregation?

7 A. That's correct.

8 Q. All right. And during what years did you  
9 serve the St. Louis congregation as an elder?

10 A. Approximately 1972 through 1975 and then again  
11 1981 to 1986.

12 Q. Okay. And during that tenure, 1972 to 1975  
13 and 1981 to '86, did you always serve as the elder of  
14 that congregation?

15 A. I was one of the elders in the congregation,  
16 yes.

17 Q. All right. You mentioned that you also served  
18 as a circuit overseer?

19 A. That is correct.

20 Q. Just briefly describe what a circuit overseer  
21 is.

22 A. He visits the congregation one week at a time,  
23 gives talks, goes out in the door-to-door ministry,  
24 meets with the pioneers, offers general encouragement.

25 Q. To each congregation?

1 A. Each congregation within a circuit.

2 Q. Okay. And then if I understand you, after you  
3 concluded your tenure as circuit overseer, you then went  
4 back to a congregation where you're currently at in  
5 Danbury?

6 A. Yes. More correctly, I was -- I was a circuit  
7 overseer. Then I left for a few years back to St.  
8 Louis, and then I went back in the circuit work until I  
9 came in Danbury.

10 Q. Okay. When did you come into Danbury?

11 A. 1994.

12 Q. All right. In conjunction with your service  
13 as an elder of Danbury, did you also work for Watchtower  
14 Service Department?

15 A. Yes. I was part of the Bethel Arrangement of  
16 Service Department.

17 Q. All right. And during what years did you work  
18 for the Watchtower Service Department?

19 A. 1994 until present.

20 Q. From 1994 to the present, while working at the  
21 Service Department, what specific positions did you  
22 hold?

23 A. I served as a service desk until I was  
24 appointed on the Branch Committee, and then I no longer  
25 had a particular desk. I was more in consulting.



1 Q. What is the Branch Committee?

2 A. The Branch Committee is a group of men  
3 appointed by the Governing Body to care for the  
4 spiritual needs of a particular country or countries.

5 Q. Was the Branch Committee within the Service  
6 Department?

7 A. No.

8 Q. All right. Is the Branch Committee a part of  
9 the Watchtower Bible and Tract Society?

10 A. When you say "Watchtower Bible and Tract  
11 Society," you mean the legal? Is that what you're  
12 having reference to?

13 Q. Let me back up. Is the Watchtower Service  
14 Department within the organization of Watchtower Bible  
15 and Tract Society of New York?

16 A. What time period are you talking about?

17 Q. From 1994 to 2001.

18 A. Well, Service Department was part of Bethel  
19 itself. Watchtower is a corporation. Bethel is -- New  
20 York Bethel is the branch for the United States, so we  
21 had letterheads that were on Watchtower letterheads.

22 Q. All right. More specifically, was the Service  
23 Department part of the Watchtower Bible and Tract  
24 Society from approximately 1970 through 2000?

25 MR. FEINBERG: Objection to the form.

1                   If you understand the question, you can  
2 answer.

3           A.    Are you waiting for me to answer?

4           Q.    (BY MR. SCHULTE) Yeah, yeah.

5                   MR. FEINBERG: I'm sorry.

6           A.    I'm sorry.

7           Q.    (BY MR. SCHULTE) That's all right. What is --  
8 strike that.

9                   You understand what the Watchtower Service  
10 Department is?

11          A.    Yeah. You say "Watchtower." You mean Service  
12 Department of Jehovah's Witnesses? I understand that.

13          Q.    Yes, sir.

14          A.    Yes, I do understand what it is.

15          Q.    All right. And is that particular department,  
16 the Watchtower Service Department, within the  
17 organization of Watchtower Bible and Tract Society of  
18 New York?

19                   MR. FEINBERG: Objection to the form.

20                   You can answer it, if you understand it.

21          A.    Yeah. Watchtower Bible and Tract Society is a  
22 legal -- it's a legal arrangement, a legal corporation.  
23 Service Department is not -- it's not a legal entity.

24          Q.    (BY MR. SCHULTE) What is -- let me ask it this  
25 way: What is your understanding of the Service



1 Department affiliation or association with the  
2 Watchtower Bible and Tract Society of New York?

3 A. Service Department meets in the buildings  
4 owned by Watchtower New York.

5 Q. Are you saying that the Watchtower Service  
6 Department is a separate entity?

7 A. No. I'm saying Service Department is part of  
8 the overall Jehovah's Witnesses arrangement.

9 Q. All right.

10 A. The Watchtower is just a legal instrument  
11 that's used by Jehovah's Witnesses.

12 Q. All right. How long were you working with the  
13 Watchtower Service Department?

14 A. Again, you say "Watchtower." You use the term  
15 "Watchtower." I worked in the Service Department of  
16 Jehovah's Witnesses since 1994 to present.

17 Q. All right. The Service Department, how  
18 long -- so 1994 to the present?

19 A. Yeah, uh-huh.

20 Q. All right. And you were an elder during that  
21 time period?

22 A. Yes.

23 Q. All right. What sort of positions did you  
24 hold within the Service Department during that time  
25 period?

1 A. Well, 1994, I served as a service desk  
2 until -- I don't remember the exact -- I can give you  
3 approximate. 2007, 2008, I was appointed to the Branch  
4 Committee. I no longer handled the service desk. I had  
5 different assignments in the Service Department --

6 Q. Okay. Fair to say --

7 A. -- and otherwise.

8 Q. Sorry. Fair to say from approximately 1994 to  
9 approximately 2008, you worked for the Service  
10 Department of the -- you worked for the service desk of  
11 the Service Department?

12 A. Yeah, that's -- yes, that's right.

13 Q. All right. Did you also or were you also the  
14 head of the Service Department?

15 A. No.

16 Q. All right.

17 A. When you say "head," what do you mean by  
18 "head" of the Service Department?

19 Q. Did you -- well, do you know Alan Shuster?

20 A. Yes, I do.

21 Q. All right. What is his position?

22 A. He's an assistant. At what time period are  
23 you having reference to?

24 Q. Sure. From 1994 to 2008.

25 A. He was -- he was like a consultant for service



1 desk. He had various administrative duties in the  
2 Service Department.

3 Q. Were you ever the supervisor to Alan Shuster?

4 A. What time do you have reference to? Ever?

5 Q. From 1994 to 2008.

6 A. No.

7 Q. You were not?

8 A. No.

9 Q. Okay. Were you ever regarded as the overseer  
10 of the Service Department?

11 A. What time period?

12 Q. From 1994 to 2008.

13 A. No.

14 Q. You've never been regarded as the overseer or  
15 head of the Service Department at Watchtower?

16 A. I have, after that.

17 Q. When were you regarded in that capacity?

18 A. Approximately 2011.

19 Q. When you say you worked for the Service  
20 Department from 1994 to 2008, what was your role in that  
21 capacity?

22 A. The service desk; I handled the service desk.

23 Q. What does that mean?

24 A. You handle correspondence, phone inquiries for  
25 a particular part of the country.

1 Q. Okay. What sort of phone inquiries?

2 A. Oh, my. Requesting scriptural direction. I  
3 mean, they're varied. I mean, I could -- many things  
4 they'll call in asking.

5 Q. When you say "they," are you referring to  
6 elders of congregations?

7 A. Individuals, non-Witnesses, Witnesses.

8 Q. During 1994 to 2008, were you ever regarded as  
9 the supervisor to Richard Ash?

10 A. When you say "supervisor," what do you mean?

11 Q. Okay. Were you ever ranked higher than either  
12 Alan Shuster or Richard Ash?

13 A. I was -- was not his overseer, no.

14 Q. Okay. You've heard of both of them?

15 A. Yes.

16 Q. All right. They're both elders?

17 A. Yes, they are.

18 Q. All right. They're both within the Service  
19 Department?

20 A. Yes.

21 Q. All right. Do you know how long Alan Shuster  
22 was in the Service Department?

23 A. I would be guessing. He was there when I came  
24 in, so I don't know exactly.

25 MR. FEINBERG: Mr. Schulte, there are no

GARY BREAUX Vol 1  
JOHN DOE I v. WATCHTOWER BIBLEMay 29, 2015  
19

1 allegations in this case after the year 2000. You've  
2 been asking questions about events from 2000 to 2011. I  
3 haven't objected yet, but I think you've gone pretty far  
4 on that, and I'm going to start objecting if this  
5 continues.

6 MR. SCHULTE: Fair enough.

7 Q. (BY MR. SCHULTE) What is the role of the  
8 Service Department?

9 A. Well, I'm speaking as an individual, because  
10 that's what my testimony is. It works under the  
11 direction of the Branch Committee to help to oversee the  
12 preaching activities in the United States Branch and  
13 congregation activities.

14 Q. Okay. The Service Department oversees the  
15 congregations of the United States; is that true?

16 MR. FEINBERG: I'm going to object and ask  
17 that the questions be limited to the period 2000 and  
18 earlier, which is the time period involved.

19 MR. SCHULTE: That's fine. Let me  
20 rephrase the question. That's fine.

21 Q. (BY MR. SCHULTE) In the '70s, '80s and up  
22 until the 2000 time period, was the Service Department  
23 responsible for providing oversight to the  
24 congregations?

25 A. Yes, under the direction of the Branch



1 Committee.

2 Q. Okay. And during that same time period, was  
3 the Service Department also responsible for providing  
4 guidelines and instructions and communications to the  
5 congregations?

6 A. When you say "responsible," what do you mean  
7 by "responsible"?

8 Q. Okay. The Service Department communicated  
9 with the congregations; is that true?

10 A. Yes.

11 Q. All right. And they -- through those  
12 communications, they provided guidelines and  
13 instructions; is that true?

14 A. Yes.

15 Q. All right. And often times, those guidelines  
16 and instructions were on letterhead; is that true?

17 A. Yes.

18 Q. All right. And between the time period that  
19 we're talking about in the 1970s, '80s and '90s up until  
20 2000, that letterhead was the Watchtower Bible and Tract  
21 Society of New York; is that true?

22 A. To my knowledge, yes.

23 Q. All right. And they were often sent out from  
24 the Service Department of the Watchtower; is that true?

25 A. Often, yes.

1 Q. All right. And these letters were often  
2 called body of elder letters; is that true?

3 A. Often?

4 Q. Yes.

5 A. No.

6 Q. All right.

7 A. I don't think so. I mean, it included letters  
8 to bodies of elders.

9 Q. The letters were addressed to body of elders?

10 A. Not all of them.

11 Q. Okay. A lot were?

12 A. A lot were, yes.

13 Q. All right. Bodies of elders, what does that  
14 mean? Is that -- what do you mean by bodies of elders?

15 A. Okay. It's -- elders is a group of men, so  
16 what qualifies a man to be an elder? We're a religious  
17 organization. We're not a secular organization, so to  
18 answer your question, I have to go to the Bible to  
19 explain to you what is an elder.

20 Q. Well, I'm not interested in knowing what an  
21 elder is.

22 MR. FEINBERG: Whether you're interested  
23 or not, he's giving an answer, so please don't interrupt  
24 him.

25 MR. SCHULTE: It's just nonresponsive.

