

***Exhibit E***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

TRACY CAEKAERT, and  
CAMILLIA Mapely,

Plaintiffs,

vs.

Case No. CV-20-52-BLG-SPW

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF NEW YORK,  
INC., and WATCH TOWER BIBLE  
AND TRACT SOCIETY OF  
PENNSYLVANIA.

Defendants,

\_\_\_\_\_)

Expert Videotaped Deposition  
In Person/Zoom Videoconference

Bradley Lovett

August 11, 2023

Reported By: Gidgette Nieves, CSR No. 10142  
WORDS COURT REPORTING SERVICES, INC.  
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10:28:06 1 1971 in Hardin. Tell me how you learn to do your  
10:28:10 2 job as an elder?  
10:28:14 3 A From what we see in the publications.  
10:28:21 4 Q Let's talk about that for a second. Which  
10:28:25 5 publications are we talking about?  
10:28:28 6 A Actually anything pertinent, I guess.  
10:28:33 7 Q Kingdom ministry school coursebook?  
10:28:36 8 A That could be, Uh-huh, yes.  
10:28:39 9 Q Okay. And would that be a book that would  
10:28:41 10 be at a, like an elder training convention?  
10:28:47 11 A Yeah.  
10:28:47 12 Q Okay. And who would put on those  
10:28:49 13 conventions, those elder training conventions?  
10:28:53 14 A The -- we say the branch though we didn't  
10:28:55 15 -- the -- yeah, Watch Tower put them on through the  
10:29:00 16 branch arrangement.  
10:29:02 17 Q In your mind during this period of time  
10:29:04 18 was there a difference between the branch and the  
10:29:07 19 Watch Tower?  
10:29:08 20 A Well in my own mind I just -- we just  
10:29:11 21 refer to it in general. We always just -- if they  
10:29:14 22 say the Society or whatever.  
10:29:17 23 Q They'd say the Society?  
10:29:19 24 A Well, we would amongst ourselves. No,  
10:29:22 25 they've -- they've approved this recommendation or

10:33:43 1 '80s, elders would be trained on how to do their job  
10:33:47 2 and what the expectations were from the Watch Tower  
10:33:50 3 Society by going through the Kingdom Ministry course  
10:33:54 4 publication at a -- at a convention or a training;  
10:33:57 5 is that right?

10:33:58 6 A We had those schools.

10:34:00 7 Q Okay.

10:34:00 8 A And I'm just saying it from my own  
10:34:03 9 standpoint in our last meeting.

10:34:04 10 VIDEOGRAPHER: Let's -- let's look at  
10:34:05 11 Document Number 4. This gentleman will help you.  
10:34:18 12 Thank you, sir.

10:34:36 13 MR. SHAFFER: All right. Exhibit 4 is the  
10:34:37 14 Kingdom school MINISTRY course.

10:34:42 15 (Exhibit 4 marked for identification.)

10:34:42 16 MR. MCCABE: It's actually called the  
10:34:44 17 "Kingdom Ministry School Course."

10:34:47 18 BY MR. SHAFFER:

10:34:47 19 Q Kingdom Ministry School. "Compiled and  
10:34:50 20 published by the Watch Tower Bible and Tract Society  
10:34:53 21 of Pennsylvania, 1972."

10:35:02 22 Have you seen -- no this is just a copy of  
10:35:05 23 it. Have you seen this publication in book form  
10:35:12 24 before?

10:35:14 25 A I -- I don't recall. They -- there used

10:35:18 1 to be a book I believe that was, you know, bound and  
10:35:24 2 that they used in these courses.

10:35:29 3 Q Okay.

10:35:29 4 A And it was -- it was abridge at this time  
10:35:32 5 went on and even the materials were done. They  
10:35:34 6 would -- not everybody went to the same school,  
10:35:40 7 taught the same thing. They --

10:35:46 8 Q Let's flip to the next page. Thank you,  
10:35:54 9 sir.

10:35:55 10 All right. The first few words here "The  
10:35:57 11 Kingdom Ministry School course has been arranged by  
10:35:59 12 the Watch Tower Bible and Tract Society to help  
10:36:04 13 overseers become equipped to shepherd the flock of  
10:36:07 14 God. The school was dedicated to Jehovah God and  
10:36:12 15 the advancement of Kingdom interest." What does  
10:36:15 16 that mean to you?

10:36:15 17 A Better do a job. Is that what you mean?

10:36:19 18 Q Okay. And when it says "Watch Tower Bible  
10:36:21 19 and Tract Society" in that first paragraph, what  
10:36:24 20 does that mean to you? Does that mean a particular  
10:36:26 21 corporation or is just a society like we've talked  
10:36:30 22 about?

10:36:31 23 A Just a society in general and most all of  
10:36:33 24 it.

10:36:34 25 Q Is it fair to say that elders are expected

10:36:37 1 to kind of know what's in this document, the Kingdom  
10:36:41 2 Ministry School course?

10:36:43 3 A Well, as many as -- as they will attend  
10:36:48 4 it. But like I say, they're usually in a  
10:36:53 5 different -- a different times and they may have  
10:36:56 6 added material or subtracted material depending on  
10:37:00 7 the circumstance. I'd say generally that's --  
10:37:05 8 that's true.

10:37:06 9 Q It's true in general that elders are  
10:37:08 10 expected to know the material in this document; is  
10:37:10 11 that fair?

10:37:11 12 A Yeah, they are instructed about it.

10:37:16 13 Q Who are the instructors at a Kingdom  
10:37:19 14 Ministry school course?

10:37:22 15 A Generally it's local circuit overseer,  
10:37:26 16 generally at that time.

10:37:28 17 Q Okay. And who decides what materials  
10:37:30 18 comes to the course?

10:37:33 19 A The branch -- it's -- it's -- it's  
10:37:36 20 printed, you know, they make that decision. And  
10:37:39 21 then how it's taught we might have a lot of  
10:37:45 22 discretion as to what we would do if we were  
10:37:50 23 teaching something like that. How you present it.

10:37:54 24 Q Okay. I think what you're saying is the  
10:37:56 25 branch would provide the circuit overseer the

10:37:58 1 material, and then the circuit overseer would have  
10:38:02 2 discretion how to teach that material at the -- at  
10:38:07 3 the school?

10:38:07 4 A Yeah, yes.

10:38:08 5 Q Is that how it was in the 1970s, 1980s?

10:38:13 6 A As best I can remember, yes.

10:38:36 7 Q Do you remember any other documents beside  
10:38:39 8 the Kingdom Ministry School course that you would  
10:38:42 9 have as a circuit overseer at a -- at an overseer  
10:38:49 10 training?

10:38:50 11 A Sometimes there might be letters that have  
10:38:52 12 come directly and if it's making a correction or  
10:38:56 13 something, and they might get that, that's about all  
10:39:00 14 I can think of.

10:39:02 15 Q And are you speaking about this kind of  
10:39:04 16 your personal experience as a circuit overseer at  
10:39:08 17 this courses?

10:39:09 18 A Uh-huh, yes.

10:39:16 19 Q Okay. I want to see if we're done with  
10:39:19 20 Document 2. Give me a second. I'm going to look at  
10:39:22 21 Document 2 and see if we're done with it.

10:40:05 22 Are you familiar with the books that are  
10:40:07 23 entitled "To Pay Attention to Yourselves and All The  
10:40:10 24 Flock"?

10:40:10 25 A Yes.

10:59:00 1 for how to perform their duties in a congregation?

10:59:03 2 A I think that this dealt with -- with that  
10:59:08 3 subject and -- and what the scripture say about  
10:59:22 4 it.

10:59:27 5 MR. SHAFFER: Okay. The next document is  
10:59:28 6 Document 12. We'll mark that as well.

10:59:43 7 (Exhibit Document 12 marked for  
10:59:43 8 identification.)

10:59:43 9 BY MR. SHAFFER:

10:59:43 10 Q This is the October -- this is the October  
10:59:47 11 1st, 1983, version of the Watch Tower. We go to the  
10:59:52 12 second page. This one says it's published by the  
10:59:55 13 Watch Tower Bible and Tract Society of Pennsylvania,  
11:00:01 14 25 Columbia Heights, Brooklyn. Is that an address  
11:00:05 15 that's familiar with you, Mr. Lovett, 25 Columbia  
11:00:09 16 Heights, Brooklyn, New York?

11:00:11 17 A Yes.

11:00:12 18 Q Is that where a circuit over either you  
11:00:14 19 sent reports and things like that?

11:00:16 20 A Yes.

11:00:18 21 Q Okay. Let's go back to your time as an  
11:00:51 22 elder. Let's go back to the first. You were an  
11:00:54 23 elder before you were a circuit overseer. If you  
11:00:58 24 read something either in the Kingdom Ministry School  
11:01:02 25 Coursebook or the pay attention to the your -- to



11:01:05 1 the flock book, and you had a question about it.

11:01:08 2 What it meant, how to apply it, how to instruct it,

11:01:11 3 what would you do? Who would you call?

11:01:15 4 A Well, they would generally have you put it

11:01:17 5 in writing. But --

11:01:19 6 Q You say they?

11:01:21 7 A I would call the -- what we call the

11:01:25 8 branch now. But who was handling the work in the

11:01:32 9 United States.

11:01:33 10 Q Okay. So either write to the branch or

11:01:35 11 call somebody at the branch with a question?

11:01:38 12 A Uh-huh.

11:01:38 13 Q That was a yes?

11:01:40 14 A Yes.

11:01:46 15 Q And did you understand -- let's again go

11:01:48 16 back to your first period of time as an elder. Did

11:01:53 17 you understand that you could be removed from your

11:01:57 18 position?

11:01:58 19 A Yes.

11:01:58 20 Q Did you ever see that happen? Did you

11:02:00 21 ever see an elder removed?

11:02:02 22 A Yes.

11:02:03 23 Q And what was the reason that you saw

11:02:05 24 elders removed from their positions?

11:02:08 25 A Just a whole variety of -- of reasons.

11:48:09 1 Q Okay. Reporting. As a circuit overseer,  
11:48:14 2 You'd send reports to the branch office, right?

11:48:22 3 A Yes.

11:48:23 4 Q You've got -- you've got your reports from  
11:48:25 5 your visit with the congregation. That's one kind  
11:48:28 6 of report; is that right?

11:48:29 7 A Yes.

11:48:31 8 Q So you visit with the congregation. You'd  
11:48:33 9 fill out the form, I can't remember, it's an "S"  
11:48:37 10 something. But You fill that out and send it to the  
11:48:39 11 branch?

11:48:39 12 A Yes.

11:48:40 13 Q And then you've got an S301. Does that  
11:48:43 14 ring a bell?

11:48:44 15 A That's a congregation -- report on the  
11:48:48 16 congregation. What's needed or what's -- what's  
11:48:51 17 being done well.

11:48:53 18 Q Yeah. I think that's an S303. The S301  
11:48:59 19 was a monthly report. Did you submit monthly  
11:49:03 20 reports to the branch office just on your work in  
11:49:06 21 general as a circuit overseer?

11:49:08 22 A I don't recall ever doing that.

11:49:11 23 Q Okay. Did you ever make recommendations  
11:49:18 24 to the branch office for other people to service  
11:49:21 25 circuit overseers?

13:40:50 1 told you that these two members of the Hardin  
13:40:54 2 congregation admitted to sexually abusing girls?

13:41:00 3 How did you learn about?

13:41:01 4 A Just -- somebody just talking about it  
13:41:03 5 among other things.

13:41:05 6 Q Okay. And it -- but they never -- I  
13:41:06 7 never -- we never had a report of anything about any  
13:41:12 8 of this when we were there and even for years  
13:41:16 9 afterwards?

13:41:35 10 Go to Tab 14 in your book. This is marked  
13:41:36 11 as Exhibit 14.

13:41:37 12 Q It's got a date of March 14 through 19,  
13:41:43 13 1978. Do you see that?

13:41:44 14 A Uh-huh, Uh-huh.

13:41:45 15 Q It's titled "Report on Circuit Overseers  
13:41:49 16 visit with Congregation."

13:41:51 17 A Uh-huh.

13:41:52 18 Q Is this sort of a report you submit as a  
13:41:57 19 circuit overseer after visiting a congregation?

13:41:59 20 A Uh-huh.

13:41:59 21 Q Is that a yes?

13:41:59 22 MR. MCKAY: Say the word yes or no. You  
13:42:00 23 nod your head --

13:42:01 24 THE WITNESS: I keep nodding my head, I'm  
13:42:04 25 sorry.

13:42:05 1 Yes, that's the -- that's the report.

13:42:06 2 BY MR. SHAFFER:

13:42:06 3 Q Let's try to be careful to not to speak  
13:42:08 4 over each other. As the day gets later, it gets  
13:42:12 5 easier to do.

13:42:14 6 A Uh-huh.

13:42:14 7 Q All right. So the first page here March  
13:42:18 8 14 to the 19th, 1978. Would that be the date of  
13:42:21 9 your visit in that congregation?

13:42:27 10 A Yes.

13:42:28 11 Q It says "Hardin congregation." It's got  
13:42:32 12 the presiding overseer as Martin Svenson. You see  
13:42:35 13 that?

13:42:35 14 A Yes.

13:42:36 15 Q You're the circuit overseer; is that  
13:42:38 16 correct?

13:42:39 17 A Yes.

13:42:48 18 Q All right. Section number one there. What  
13:42:50 19 is that talking about, where it says public meeting?  
13:42:54 20 Is that -- tell me what that is.

13:42:56 21 A Attendance. Average attendance.

13:42:59 22 Q Average attendance?

13:43:01 23 A Uh-huh.

13:43:01 24 Q So this is information you're getting from  
13:43:02 25 the congregation and you're sending this back to the

13:43:06 1 branch office, correct?

13:43:10 2 A Yes.

13:43:11 3 Q Okay. And this information you're getting  
13:43:12 4 about average attendance, that's being kept by the  
13:43:15 5 congregation itself, is that right?

13:43:17 6 A Yes. They have attendance cards and they  
13:43:20 7 just write it down every week.

13:43:22 8 Q And that's information the branch office  
13:43:25 9 wants to know about the congregation. Is that fair  
13:43:26 10 to say?

13:43:28 11 A Yeah.

13:43:43 12 Q Number three there. Since last visit.  
13:43:46 13 How many were just fellowship, that's not filled  
13:43:49 14 out. I assume that's just zero?

13:43:52 15 A Yes.

13:43:53 16 Q How many were disassociated -- how many  
13:43:54 17 disassociated themselves, that's zero. How many  
13:43:57 18 were reprovved. In some way they're put on  
13:44:00 19 restriction by the judicial committee, that's zero.  
13:44:03 20 It's not filled out there. Does that mean that's  
13:44:07 21 zero?

13:44:08 22 A Evidently, yes.

13:44:09 23 Q Okay. Let's go to the second page.  
13:44:17 24 Section seven. "The friends here are doing well and  
13:44:20 25 are enjoying exceptionally good relations with one

13:44:25 1 another with no trace of past problems, noted."

13:44:28 2 What is that referring to?

13:44:30 3 A Just some personality issues from someone  
13:44:34 4 who had moved in to the congregation.

13:44:36 5 Q I want to know exactly what those  
13:44:39 6 personality issues were. And, yeah, who are you  
13:44:41 7 talking about?

13:44:42 8 A Well, two of the women really. They got  
13:44:47 9 after each other. They had disagreements. I don't  
13:44:49 10 know if it was jealousy or what, that was  
13:44:53 11 basically.

13:44:53 12 Q Who were the women?

13:44:57 13 A I -- I'm trying to remember. I can't -- I  
13:44:59 14 can't remember the names.

13:45:02 15 Q James Roland's wife?

13:45:04 16 A No, no. No, it was -- it wasn't -- it  
13:45:12 17 wasn't her. It wasn't anyone that's on any of this.

13:45:21 18 Q Okay. Keep going. "The Kingdom Hall is  
13:45:26 19 crowded and the meetings well attended in both  
13:45:29 20 Hardin and Landier."

13:45:31 21 Is that what was reported to you by the  
13:45:33 22 Hardin congregation elders?

13:45:36 23 A I'm -- I'm assuming anything coming from  
13:45:39 24 Landier someone would have to basically tell me.

13:45:46 25 They eventually build to me. A new

13:45:51 1 building, a bigger one.

13:45:59 2 Q In the section nine. "Ministerial Servant  
13:46:02 3 Gunner, Brother Gunner Hain was restricted." How  
13:46:07 4 did you learn that?

13:46:08 5 A They told me.

13:46:09 6 Q Okay. And "The Society was not notified  
13:46:13 7 that he was restricted. The elders are intending to  
13:46:15 8 write immediately, and several months have past."

13:46:18 9 Why was Mr. Hain restricted?

13:46:21 10 A I don't know. That was at a period of  
13:46:23 11 time when they told us leave it to local elders,  
13:46:27 12 don't inquire, don't report on it, but take -- just  
13:46:30 13 make note of it, I guess. I didn't learn about  
13:46:34 14 that, I don't think, until the end of the week or  
13:46:37 15 something, but --

13:46:39 16 Q And I see you didn't add that to section  
13:46:41 17 number three, right, in terms of how many others  
13:46:44 18 were reprovved and some way put under restriction?

13:46:50 19 A No.

13:46:50 20 Q Okay.

13:46:51 21 A It hadn't been -- it hadn't been handled  
13:46:54 22 and you had to wait until those things were all  
13:46:56 23 established.

13:46:56 24 Q And then this is the form that you filled  
13:46:59 25 out. See your signature at the bottom of page two,

13:47:02 1 right?

13:47:03 2 A Yes.

13:47:03 3 Q And then you sent this on to the branch  
13:47:06 4 office?

13:47:06 5 A Yes.

13:47:11 6 Q Why did you underline "write immediately,"  
13:47:16 7 the elders are intending to, quote, write  
13:47:19 8 immediately?

13:47:20 9 A Because it's so easy for everybody to put  
13:47:23 10 things off. And they evidently -- they had and so I  
13:47:26 11 would tell them to write immediately, if anything  
13:47:28 12 came up like that, don't delay and do it now.

13:47:33 13 Q Okay. Is it fair to say that this gave  
13:47:38 14 branch office notice that Gunner Hain had been  
13:47:41 15 restricted, this document here?

13:47:44 16 A Yes.

13:47:45 17 MR. SWEENEY: Objection; lacks  
13:47:49 18 foundation.

13:47:50 19 BY MR. SHAFFER:

13:47:50 20 Q Okay. And your testimony is that you did  
13:47:53 21 nothing to inquire into the reason that Mr. Hain was  
13:47:55 22 restricted?

13:47:57 23 A Uh-huh.

13:47:58 24 MR. MCCABE: Is that a yes or no?

13:47:59 25 THE WITNESS: No. We weren't supposed to.