

Exhibit I

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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09:50:46 1 different than an elder or is that the same?

09:50:49 2 A Well, we didn't have elders at the time.
09:50:52 3 And they needed to fill these slots. And -- you'll
09:51:00 4 notice even my mother was put in there.

09:51:04 5 Q And that's not typical is it to have a
09:51:07 6 female on here as a servant or an elder or
09:51:11 7 anything?

09:51:11 8 A At that time -- it wasn't typical but it
09:51:14 9 wasn't uncommon.

09:51:16 10 Q Okay. How many approximately people were
09:51:19 11 at the -- in the new Hardin congregation in 1971, if
09:51:23 12 you remember?

09:51:25 13 A Maybe -- maybe 30, 35. I'm just
09:51:30 14 guessing.

09:51:33 15 Q And this -- this document we're looking at
09:51:36 16 Exhibit 1, it looks like it came from the Watch
09:51:40 17 Tower Society in New York?

09:51:42 18 A Yes.

09:51:43 19 Q Looks like the Watch Tower Society is
09:51:45 20 saying that -- I'll read it. Their pleased to
09:51:50 21 advise that the servant appointments to the
09:51:54 22 positions below have been made.

09:51:56 23 Did you understand that the Watch Tower
09:52:00 24 Society had approved these -- these specific
09:52:02 25 appointments?

09:52:03 1 A Well, when the letter came back that

09:52:05 2 was --

09:52:05 3 Q That's what this letter is saying?

09:52:07 4 A Uh-huh.

09:52:08 5 Q The Watch Tower Society approved these
09:52:12 6 appointments, correct?

09:52:13 7 A Uh-huh, yeah.

09:52:14 8 Q Okay. And again, I'm sorry, I don't know
09:52:18 9 if you answered that question. About how many
09:52:19 10 people were in the congregation at that time?

09:52:22 11 A 30, maybe 35.

09:52:24 12 Q How did you go about finding these
09:52:26 13 people?

09:52:27 14 A We -- we contacted them in the -- either
09:52:32 15 in our house-to-house ministry and some had known in
09:52:39 16 some other areas they -- they -- and they wanted
09:52:41 17 to -- to attend so they had moved to Hardin and they
09:52:48 18 began attending once we had a -- a meeting plan.

09:52:55 19 Q Okay. If you look at the bottom of this
09:53:01 20 document, sir --

09:53:02 21 A Uh-huh.

09:53:03 22 Q -- in the fine print down there it states
09:53:06 23 that "Please see that the newly appointed servant
09:53:10 24 becomes thoroughly familiar with his duties as they
09:53:14 25 are set forth in the book. Your world is a Lamp to

09:53:17 1 my foot, comma, and then the Kingdom ministry." Do
09:53:22 2 you see that, sir?

09:53:23 3 A Yeah, uh-huh.

09:53:26 4 Q And are those books that you would -- the
09:53:28 5 congregation would get from the Watch Tower
09:53:31 6 Society?

09:53:31 7 A Yes.

09:53:32 8 Q And you understood from this letter that
09:53:33 9 the servants in this congregation, the new servants
09:53:38 10 needed to become familiar with the duties that are
09:53:40 11 set forth in those books?

09:53:42 12 A Yes.

09:53:42 13 Q Okay. That's part of the job of being a
09:53:45 14 servant in a new congregation?

09:53:50 15 A Yeah.

09:53:57 16 Q Do you recall when the first elders were
09:54:00 17 appointed on this new congregation?

09:54:04 18 A Probably. I think the arrangement came in
09:54:06 19 about '71, I think.

09:54:08 20 Q Who were the original elders?

09:54:14 21 A I can't remember. Martin Svenson I think
09:54:21 22 was one. Harold Rimby. And they put me down even
09:54:27 23 though I think I been baptized six months or
09:54:32 24 something at the time. I'm trying to think if there
09:54:39 25 were others. I can't remember.

10:20:07 1 BY MR. SHAFFER:

10:20:07 2 Q Is this a document -- or have you ever
10:20:08 3 seen a document like this before?

10:20:10 4 A Uh-huh.

10:20:11 5 Q What kind of document is this? What is
10:20:16 6 this?

10:20:16 7 A It's -- I forget the -- the number on it.
10:20:18 8 But it was where they put the
10:20:20 9 recommendations for elder's ministerial service.

10:20:23 10 Q Okay. When you say "they put the
10:20:26 11 recommendation," you mean the circuit overseer would
10:20:29 12 do that?

10:20:30 13 A The local congregation along with the
10:20:34 14 circuit overseer.

10:20:34 15 Q Okay. And then if we flip to the second
10:20:37 16 page of Exhibit 3, I'm going to direct you to --
10:20:46 17 let's go back to the first page. Just one second.
10:20:54 18 The stamp up here in the upper left-hand corner
10:20:58 19 duplicate copy to "society for return after
10:21:01 20 approval"?

10:21:02 21 MR. MCCABE: There's no stamp on this
10:21:04 22 copy.

10:21:05 23 BY MR. SHAFFER:

10:21:05 24 Q Do you see where it says "duplicate copy
10:21:09 25 to Society for return after approval." Do you see

10:21:11 1 that, Mr. Lovett?

10:21:13 2 A Yes.

10:21:13 3 Q And is that referring to the copy that
10:21:15 4 would go to New York that would get stamped either
10:21:18 5 approving or not approving the elders and then come
10:21:22 6 back to the congregation?

10:21:23 7 A Yeah.

10:21:24 8 Q And if we flip to the next page, same
10:21:32 9 corner there, upper left-hand corner. "Governing
10:21:37 10 body has approved the recommendations on the reverse
10:21:40 11 side as indicated by the Watch Tower Society stamp,"
10:21:42 12 below; do you see that, Mr. Lovett?

10:21:44 13 A Yes.

10:21:45 14 Q And then there's the Stamp Watch Tower
10:21:47 15 Bible and Tract Society New York?

10:21:48 16 A Yes.

10:21:50 17 Q SCL, May 7th, 1984. You see that?

10:21:53 18 A Yes.

10:21:53 19 Q Is that the Watch Tower Society then
10:21:56 20 approving the appointment of those elders on the
10:21:57 21 previous page?

10:21:58 22 A Yes.

10:21:59 23 Q Okay. Is that how the process worked in
10:22:01 24 the 70s as you understood it?

10:22:04 25 A As I recall, Uh-huh.

10:22:05 1 Q Okay. Do you know what SCL stands for?

10:22:11 2 A Yeah, I'm not sure. I guess it's just a
10:22:15 3 designation.

10:22:17 4 Q All right.

10:22:18 5 A I want to say Southern California but it
10:22:22 6 doesn't. It's in Montana.

10:22:23 7 Q All right. Let's go back to Document
10:22:26 8 number?

10:22:26 9 A Is this the one you --

10:23:23 10 Q Okay. I'm going to flip this to a page.
10:23:25 11 Sorry, this is going to be a little tedious for
10:23:28 12 awhile this morning, just flipping through this
10:23:29 13 document. But we'll get through it.

10:23:53 14 James, we're missing some pages on this
10:23:55 15 one. We are just going to use mine for number two.
10:24:30 16 All right. We'll stick this one. So we're looking
10:24:33 17 at Caekaert/Mapely 1872 on the bottom right.
10:24:39 18 Paragraph 58. Can you read -- are you able to read
10:24:42 19 that paragraph 58. I don't want you to read the
10:24:45 20 whole thing. But I just want to know if you can
10:24:47 21 read it in general.

10:24:48 22 A Yeah.

10:24:49 23 Q That says recommendations for new
10:24:50 24 appointments or deletions. It says, that they're
10:24:51 25 made on the S2 form when the circuit overseer visits

10:24:55 1 the congregation. Is that the process we were just
10:24:58 2 talking about for the appointment of elders?

10:25:02 3 A Yes.

10:25:03 4 Q Okay. Says the S2 form is then sent to
10:25:06 5 the Society along with another Form S303 form.
10:25:13 6 Shows the appointments for elders or deletions. And
10:25:20 7 then it says: The branch committee must decide
10:25:24 8 whether or not to approve the recommendations by the
10:25:27 9 elders and by the circuit overseer. Is that the
10:25:30 10 process -- the same process we've talked about this
10:25:33 11 morning for appointing elders?

10:25:36 12 A Yes. It appears to be.

10:25:47 13 Q All right. Did you under -- was there any
10:25:48 14 other way to be appointed as an elder in the
10:25:53 15 1970s -- let's talk about the late 70s then, after
10:25:57 16 77?

10:25:58 17 A I don't know. I don't know all of
10:25:59 18 their -- I know that way. But I -- I don't know if
10:26:02 19 there were other --

10:26:02 20 Q Are you aware -- aware of any another
10:26:07 21 method to be appointed as an elder?

10:26:10 22 A Not actually. There was no -- this was
10:26:12 23 the only routine that you went through.

10:26:15 24 Q Okay. Can we agree then that the only way
10:26:17 25 to be appointed an elder during this time period

10:26:21 1 would be if the Watch Tower Society approved it?

10:26:25 2 A I don't know.

10:26:26 3 MR. TAYLOR: Listen to the question.

10:26:26 4 MR. SHAFFER: Sorry, we couldn't hear you,
10:26:26 5 Joel.

10:26:36 6 We couldn't hear you.

10:26:36 7 MR. TAYLOR: I didn't understand which
10:26:39 8 defendant he was referring to. He just said, "Watch
10:26:42 9 Tower Society" so I just objected for the record.

10:26:46 10 BY MR. SHAFFER:

10:26:46 11 Q Okay. Are you aware of any other way that
10:26:49 12 an elder can be appointed other than by approval of
10:26:52 13 the Watch Tower Society?

10:26:53 14 A I'm just -- I'm not aware. There may be
10:26:54 15 other -- other ways or whatever, but I don't know.
10:26:55 16 I'm not -- I'm just a little --

10:26:57 17 Q Yeah. This is the only method you're
10:27:00 18 aware of.

10:27:01 19 A Yes, that I'm aware of. That I used when
10:27:04 20 I was there, yes.

10:27:04 21 Q You can't appoint yourself as an elder,
10:27:08 22 right?

10:27:09 23 A I assume.

10:27:10 24 Q Okay. Have you ever seen -- have you ever
10:27:13 25 seen anybody appointed as an elder that wasn't

10:27:17 1 approved by the Watch Tower Society?

10:27:20 2 A No.

10:27:22 3 MR. TAYLOR: Again, my objection to the
10:27:23 4 form of the question.

10:27:25 5 BY MR. SHAFFER:

10:27:25 6 Q Mr. Lovett do you understand the
10:27:27 7 question?

10:27:27 8 A Uh-huh, yes.

10:27:28 9 Q Are you aware of anybody ever being
10:27:30 10 appointed an elder to a congregation that was not
10:27:34 11 approved by the Watch Tower Society?

10:27:36 12 A I -- I don't know. I'm --

10:27:37 13 Q You don't know whether you're aware of
10:27:38 14 it?

10:27:39 15 A If there is another method, I have no
10:27:42 16 idea.

10:27:42 17 Q Okay. So the only method you're aware of
10:27:45 18 is when the Watch Tower Society approves it?

10:27:48 19 MR. TAYLOR: Again, objection to the form
10:27:49 20 of the question.

10:27:54 21 BY MR. SHAFFER:

10:27:54 22 Q Yes or no?

10:27:57 23 A They've always handled it this way, that's
10:27:59 24 it.

10:28:01 25 Q Okay. All right. You become an elder in

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

10:29:24 1 whatever. We just -- that was pretty common.

10:29:26 2 Q And that's what the literature would say,
10:29:28 3 right, the literature would say with the Society,
10:29:31 4 wouldn't it, the publications?

10:29:33 5 MR. TAYLOR: Again Objection to the
10:29:34 6 form.

10:29:35 7 THE WITNESS: What would -- yeah, what
10:29:37 8 would you have in mind? What were you -- what were
10:29:39 9 you thinking?

10:29:40 10 BY MR. SHAFFER:

10:29:40 11 Q Well, I want to know what you were
10:29:42 12 thinking. How did you come to refer to as the
10:29:44 13 Society? I mean you saw that somewhere, right?

10:29:46 14 A Well, it -- it was printed by them.
10:29:48 15 Whatever it was printed we'd say well, we got that
10:29:52 16 from the Society.

10:29:53 17 Q Okay. And did you understand the Society
10:29:54 18 was different from the branch office?

10:29:57 19 A They are somewhat different in the sense
10:30:03 20 that -- but we -- we just generally referred to it
10:30:05 21 as -- as the Society. We wrote a letter to the
10:30:08 22 Society and it would be to the branch actually. But
10:30:12 23 we just --

10:30:15 24 Q Okay. All right. We were talking about
10:30:16 25 how you learned to do your job as an elder. We

10:30:18 1 talked about the publication. You mentioned
10:30:21 2 publications. I mentioned the Kingdom Ministry
10:30:24 3 coursebook. And then we talked about that would be
10:30:27 4 introduced to the elders at a -- like an elder
10:30:30 5 training convention.

10:30:31 6 A It could be. They did it a number of
10:30:34 7 different ways.

10:30:34 8 Q And as a circuit overseer you've attended
10:30:39 9 and instructed elders at a Kingdom School Ministry
10:30:43 10 course, haven't you?

10:30:44 11 A Yes.

10:30:45 12 Q And that's -- is that a meeting where
10:30:47 13 you'll meet with elders and you'll have literature
10:30:50 14 from the Watch Tower Society with you that you go
10:30:53 15 through kind of on a schedule with the elders to
10:30:56 16 instruct them how to do their job. Is that a fair
10:31:00 17 description?

10:31:01 18 A Well, a lot of that changed over the years
10:31:04 19 too. And I'm trying to think back on the various
10:31:13 20 methods or approaches. But there would be -- our
10:31:18 21 schools we would have that would deal with certain
10:31:23 22 aspects of -- of the arrangement. They didn't --
10:31:28 23 they didn't comprehensively do everything all at
10:31:30 24 once, they just -- and that's where you would learn
10:31:34 25 certain things. But all of those things can be

10:31:37 1 abridge by letters or -- or other publications that
10:31:40 2 might come out later.

10:31:41 3 Q So everything in the Kingdom school
10:31:44 4 ministry course could be abridged by a letter that
10:31:47 5 would come from the Watch Tower Society or other
10:31:50 6 publications; is that fair?

10:31:51 7 A Or some direction, you know, specifically
10:31:53 8 dealing with -- with that subject.

10:31:56 9 Q Okay. Do you know who James Roland is?

10:31:57 10 A Yes.

10:31:58 11 Q He's been deposed. And he said when he
10:32:01 12 was appointed as an elder he went to a training
10:32:05 13 course for elders in Billings.

10:32:08 14 A Uh-huh.

10:32:09 15 Q And he described going through the Kingdom
10:32:10 16 school ministry course.

10:32:12 17 A Uh-huh.

10:32:12 18 Q Does that ring a bell to you having an
10:32:15 19 elder training in Billings at any point in time
10:32:18 20 or?

10:32:18 21 A We never did in -- in Billings.

10:32:21 22 Q Where did you do them? Where did the
10:32:23 23 Hardin congregations elders have their Kingdom
10:32:26 24 school ministry course?

10:32:27 25 A I don't know. I was gone.

10:32:28 1 Q Okay. But in the period of let's say the
10:32:35 2 late 1970s at least through the mid '80s were elders
10:32:41 3 trained at a Kingdom school ministry course with a
10:32:46 4 document called the Kingdom school ministry
10:32:49 5 course?

10:32:51 6 A I don't -- it was pretty much related to a
10:32:59 7 particular subject; whatever it might happen to be.
10:33:02 8 There's -- I mean you could -- you could spend
10:33:05 9 months on -- on some of that.

10:33:06 10 Q But sure. Let's not -- I don't want to
10:33:08 11 get into the particulars of what was being trained
10:33:12 12 and taught or instructed. But just in general as a
10:33:15 13 concept isn't that how elders would learn to do
10:33:18 14 their job in the late 70s to mid 80s, they'd go to a
10:33:21 15 Kingdom school ministry course with publications
10:33:23 16 from the Watch Tower Society?

10:33:24 17 A Most --

10:33:25 18 MR. TAYLOR: Again objection to the form
10:33:26 19 of the question.

10:33:28 20 BY MR. SHAFFER:

10:33:28 21 Q You can answer. It's okay.

10:33:30 22 A Most of the time. What my -- what I was
10:33:35 23 trying to say a minute ago -- what was your
10:33:37 24 question?

10:33:39 25 Q As a general concept late 1970s to the mid

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

10:41:25 1 Q Branch Organization?

10:41:27 2 A Yeah, we never -- we didn't follow -- we
10:41:30 3 weren't involved with that. It may be things from
10:41:33 4 it, may be repeated in other places. But none of
10:41:37 5 those were ever handed out to anybody that I know
10:41:40 6 of.

10:41:41 7 Q How about a circuit overseer. Did you
10:41:43 8 ever see that document, the Branch organization
10:41:50 9 Manual?

10:41:51 10 A No, we didn't get any of that.

10:41:54 11 Q Okay. Do you know who used that book, the
10:41:57 12 Branch Organization Manual?

10:42:00 13 A No.

10:42:03 14 Q Okay. I think we're probably done with
10:42:05 15 Exhibit 2 then.

10:42:39 16 MR. SHAFFER: Let's look at Tab 5, mark
10:42:43 17 Exhibit 5.

10:42:44 18 (Exhibit 5 marked for identification.)

10:42:44 19 BY MR. SHAFFER:

10:42:44 20 Q All right. This is a book I've mentioned
10:42:47 21 "Pay Attention to Yourself and all the Flock." Flip
10:42:51 22 to the third page. There you go. It says "Kingdom
10:43:01 23 Ministry School Textbook." Do you see that, Mr.
10:43:06 24 Lovett?

10:43:07 25 A Yes.

10:43:07 1 Q Is that in reference to the fact that this
10:43:10 2 is a sort of a book you have in an elder ministry
10:43:14 3 school?

10:43:15 4 A Yes.

10:43:16 5 Q Okay, in general. And go to the next
10:43:19 6 page. It says "Published by Watch Tower Bible and
10:43:23 7 Tract Society. This one is of New York, September
10:43:26 8 1977. I assume the fact that this one is from New
10:43:35 9 York and the previous one was published and
10:43:37 10 distributed by Watch Tower Bible and Tract Society
10:43:41 11 Pennsylvania. I -- I assume that didn't effect your
10:43:44 12 job at all as a circuit overseer teaching this
10:43:47 13 stuff, did it?

10:43:48 14 A I don't -- no, I don't believe so.

10:43:55 15 Q All right. So if we can look at this
10:43:59 16 page. You got there. Thank you. Bate's number
10:44:00 17 229, this is WTNY229. The top there's "To the
10:44:08 18 student." Who would the student be in this
10:44:12 19 course?

10:44:13 20 A Probably the elders I would think.

10:44:15 21 Q Okay. Pay Attention to Yourselves and All
10:44:18 22 the Flock is a continuation of the Kingdom of
10:44:23 23 Ministry school course. So it looks like this is
10:44:26 24 kind of an addition to, and you've kind of mentioned
10:44:29 25 this, this morning. You have abridgements or

10:44:31 1 additions to the Kingdom of School -- Kingdom

10:44:34 2 Ministry School coursebook. This would be one of

10:44:37 3 those -- looks like this would be one of those

10:44:40 4 additions to it; is that right?

10:44:42 5 A I don't know as you would say it's an

10:44:44 6 addition, but it would explain many things that have

10:44:49 7 already been taught or they would go back and deal

10:44:52 8 with that.

10:44:52 9 Q Okay. Is this a document, sir, that you

10:45:02 10 became familiar with as an elder and a circuit

10:45:05 11 overseer?

10:45:06 12 A Well you tried, uh-huh.

10:45:08 13 Q Okay. That's what the Watch Tower Society

10:45:11 14 wanted you to do, correct?

10:45:15 15 A Yes.

10:45:39 16 MR. SHAFFER: Okay. Number 6. Document

10:45:40 17 number 6.

10:45:43 18 (Exhibit Number 6 marked for identification.)

10:45:43 19 BY MR. SHAFFER:

10:45:43 20 Q Again, bottom right corner on the cover

10:45:45 21 page, Kingdom Ministry School Textbook, and it says

10:45:48 22 KS81. The next page Published by Watch Tower Bible

10:45:53 23 and Tract Society of New York. This one is 1981. I

10:46:04 24 forgot to mention that. This one starts -- if you

10:46:09 25 look at the table of content, sir, Bate's document

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.

11:02:13 1 If they -- then -- you know, for an
11:02:19 2 extended period of time they didn't come to the
11:02:22 3 meetings, they didn't participate in -- in the field
11:02:26 4 that, that type of thing. And it goes wrong, they
11:02:30 5 would of course they would be removed.

11:02:33 6 Q Okay. Failure to perform the duties of an
11:02:37 7 elder would that be a reason to be removed or
11:02:42 8 deleted as an elder?

11:02:44 9 A Yes. It depends on what -- what duties, I
11:02:46 10 guess too. Cause sometimes they couldn't help it.
11:02:47 11 They had some other reason, but they were not able
11:02:49 12 to share or participate.

11:02:51 13 Q And if an elder is deleted does that
11:02:54 14 follow kind of the process we talked about for the
11:02:58 15 appointment whereby there's that S2 form that has
11:03:01 16 appointments and deletions?

11:03:03 17 A Uh-huh.

11:03:03 18 Q If it's a deletion the elder's name would
11:03:06 19 be put in the column for the deletion that would be
11:03:08 20 sent to the branch office, right?

11:03:11 21 A Uh-huh.

11:03:11 22 Q That's a yes?

11:03:13 23 A With an explanation. What -- what the
11:03:15 24 situation was.

11:03:16 25 Q And the branch officer review it, and if

11:03:19 1 the branch office approved it, you'd get the
11:03:22 2 stamp?

11:03:22 3 A Come back just like you saw.

11:03:24 4 Q It would come back to the congregation?

11:03:27 5 A Yeah.

11:03:28 6 Q Okay. Branch office kept a copy of that
11:03:31 7 document as far as you know?

11:03:33 8 A As far as I know. And I don't, you know,
11:03:38 9 I don't know what they do with a lot of that. But
11:03:41 10 as far as I know.

11:03:44 11 Q You have not seen their files, I take
11:03:47 12 it?

11:03:47 13 A No.

11:03:48 14 Q Fair enough. Tell me about your files.
11:03:50 15 Did you keep files as an -- as an elder?

11:03:54 16 A Yes.

11:03:55 17 Q How would you keep those documents?

11:03:58 18 A Well, you just make a copy of whatever
11:04:00 19 reports you were sending in.

11:04:02 20 Q Okay. And would you keep hard copies?
11:04:07 21 Back in the '70s and '80s, would you keep the hard
11:04:10 22 copies?

11:04:11 23 A Yes.

11:04:11 24 Q Is there a file cabinet in the
11:04:14 25 congregation? Did you keep it at your house? How

12:29:11 1 specifically. The elders would write about some
12:29:15 2 specifics and everything else and send that into the
12:29:18 3 Society.

12:29:25 4 Q And you said at some point in time
12:29:28 5 specific procedures for handling child sex abuse
12:29:32 6 came down from the branch of the Society, right?

12:29:35 7 A Yeah. Well, you -- yes, you'd see it.

12:29:37 8 Q Do you know why that was. Do you know why
12:29:39 9 specific procedures were handed down for child sex
12:29:42 10 abuse?

12:29:43 11 A Well I would assume to kind of standardize
12:29:45 12 it and give them some good guidance on what to do.
12:29:52 13 I don't know the first time it ever came up. There
12:29:54 14 was many of them. And it really wasn't established.
12:29:58 15 But we -- we couldn't find a lot on it. But we knew
12:30:01 16 that it was wicked and wrong. And you'd act on it
12:30:08 17 if you could and you'd use the scriptures you had.
12:30:10 18 And usually they were -- they were sufficient at
12:30:14 19 that time.

12:30:15 20 Q And you're talking the time before
12:30:17 21 specific procedures were handed out?

12:30:20 22 A Yeah. In the, oh, the 70s these things
12:30:26 23 kind of come out. As needed, they come out in these
12:30:29 24 letters. But usually it was to address a
12:30:32 25 specific.

12:35:24 1 Q Sure. That's part of the role of the
12:35:27 2 elder, isn't it, to check in on the flock like
12:35:29 3 that?

12:35:30 4 A Uh-huh.

12:35:31 5 Q That's a yes?

12:35:32 6 A Without -- yeah, without overdoing it and
12:35:36 7 just giving your best answer off the top of your
12:35:39 8 head. You want to have some basis for whatever you
12:35:45 9 -- you're saying, if at all possible.

12:35:48 10 MR. MCCABE: Excuse me. I'm just going to
12:35:50 11 stick my head out and ask for more air. I think
12:36:16 12 we're going to die in here pretty soon.

12:36:16 13 MR. SHAFFER: Sure.

12:36:16 14 MR. SWEENEY: The air conditioning works
12:36:19 15 pretty well in here.

12:36:19 16 MR. SHAFFER: Yeah, if we have AC that's
12:36:19 17 fine.

12:36:19 18 BY MR. SHAFFER:

12:36:19 19 Q And tell me as an elder what do you
12:36:21 20 have -- if someone comes to you and you're talking
12:36:23 21 to that person about their problem, you're maybe
12:36:27 22 reading some scripture to them. I assume it's
12:36:31 23 pretty important to keep that stuff confidential?

12:36:34 24 A Yes.

12:36:35 25 Q Okay. Do you tell anybody about it? Do

14:06:59 1 Q No. The reporting. I think we're talking
14:07:01 2 about the reporting now?

14:07:02 3 A Oh, the reporting. I'm not sure when that
14:07:06 4 took place.

14:07:07 5 Q Okay.

14:07:08 6 A But I know it came up and maybe it was one
14:07:11 7 of our schools or something.

14:07:13 8 Q All right. Are you aware that, I'm sure
14:07:16 9 you are, that Jehovah's Witness church has a
14:07:22 10 confidentiality policy?

14:07:23 11 A Uh-huh.

14:07:24 12 Q Comes from scripture?

14:07:27 13 A Huh.

14:07:27 14 Q Is that right?

14:07:28 15 A Yes. I don't know what you -- what you
14:07:30 16 mean as far as -- as far as that goes.

14:07:33 17 Q You don't talk about --

14:07:34 18 A Explain it to me.

14:07:35 19 Q Yeah. You don't talk about things that
14:07:37 20 you've learned about other people, right?

14:07:40 21 A True.

14:07:41 22 Q That's important?

14:07:42 23 A Pardon.

14:07:43 24 Q That's important to not talk about things
14:07:46 25 you've learned about other people, you agree?

14:07:48 1 A That's true.

14:07:49 2 Q And that's a policy that comes right from
14:07:51 3 scripture?

14:07:52 4 A Yes. You're not gossiping about them or
14:07:55 5 telling things that are untrue.

14:08:10 6 Q Has that been the policy ever since you've
14:08:14 7 been a part of the church?

14:08:17 8 MR. MCCABE: What policy, I'm sorry?

14:08:19 9 BY MR. SHAFFER:

14:08:19 10 Q Confidentiality policy of not talking
14:08:22 11 about what you learn about other people?

14:08:23 12 MR. TAYLOR: Just object to the form
14:08:24 13 of term -- form of the question, and the term
14:08:25 14 "policy." If it's a principle found in the Bible,
14:08:29 15 they might follow it.

14:08:31 16 BY MR. SHAFFER:

14:08:31 17 Q Has that been the same throughout your
14:08:34 18 experience in Jehovah's Witness church,
14:08:36 19 Mr. Lovett?

14:08:38 20 A Yes.

14:08:45 21 Q Okay. And like any sin I assume that's --
14:08:47 22 you have to answer to God if you were to violate
14:08:49 23 that policy, that rule, that scripture --

14:08:53 24 A Uh-huh.

14:08:53 25 Q -- is that fair?

14:08:55 1 A Up to us to make -- to retain
14:09:00 2 confidentiality.

14:09:01 3 Q And if you don't do that you have to
14:09:02 4 answer to got at some point in time; is that fair?

14:09:05 5 A Well, he would be aware of what -- what
14:09:09 6 you've done if you've done that sort of thing and
14:09:12 7 that's all.

14:09:13 8 Q And so if you've learned that a person has
14:09:16 9 been sexually abused or that a person has sexually
14:09:20 10 abused a young girl, let's put it that way. You've
14:09:22 11 learned that a member sexually abused a young girl,
14:09:25 12 you've got an obligation to keep that confidential,
14:09:28 13 what that person has done?

14:09:30 14 MR. TAYLOR: Objection to the form of the
14:09:32 15 question. Poses an incomplete hypothetical for
14:09:35 16 which this individual has already said he's never
14:09:38 17 participated in any type of hearing about that.

14:09:40 18 BY MR. SHAFFER:

14:09:40 19 Q Talking about the application of the
14:09:42 20 confidentiality policy that you said has been the
14:09:44 21 same throughout your --

14:09:47 22 A Well, we've always been talking to keep it
14:09:49 23 confident, and we don't discuss it with anyone.

14:09:53 24 Q So someone -- you learned that somebody
14:09:54 25 steals a car, a member of the church steals a car.

14:09:58 1 You have an obligation to keep that confidential,
14:10:01 2 right?

14:10:02 3 A Yes --

14:10:04 4 MR. TAYLOR: Objection. Objection again
14:10:04 5 to the form of the question. If he learns of this
14:10:07 6 communication in a confidential setting in a
14:10:10 7 judicial committee, he might have certain
14:10:13 8 obligations. If he observed someone as a witness
14:10:16 9 stealing a car, just as a particular person, he
14:10:19 10 might have different obligations. The hypothetical
14:10:23 11 is incomplete.

14:10:26 12 BY MR. SHAFFER:

14:10:26 13 Q You learned that so and so steals a car in
14:10:29 14 your role as an elder, you're not supposed to gossip
14:10:33 15 about that, are you?

14:10:35 16 A No.

14:10:35 17 MR. MCCABE: Objection as to the
14:10:37 18 incomplete hypothetical. So and so member of the
14:10:41 19 congregation or are they just a passerby?

14:10:44 20 BY MR. SHAFFER:

14:10:44 21 Q Okay. You learn that a member of the
14:10:46 22 congregation hurts his wife, physical abuse, you're
14:10:50 23 not supposed to gossip about that, are you?

14:10:54 24 A Well, depending on the situation. We
14:10:56 25 would take it to the elders and depending on how

14:11:01 1 extreme it was and whatever sometimes it's -- these
14:11:06 2 are misunderstanding or it's not a judicial
14:11:10 3 matter.

14:11:11 4 Q So the elders might discuss it amongst
14:11:14 5 themselves?

14:11:16 6 A Well on these issues where you're trying
14:11:18 7 to form a committee or trying to help them in some
14:11:22 8 way that would, they can do that, they can discuss
14:11:23 9 it, but they have to keep it among themselves.

14:11:27 10 Q The elders do?

14:11:28 11 A Yeah. They can't spread it around.

14:11:31 12 Q And so the elders would be held to that
14:11:34 13 confidentiality policy on that subject matter?

14:11:39 14 A Yes, yes.

14:11:52 15 Q Same rule applies to -- let's say you
14:11:55 16 learned that again as your time as an elder you
14:11:59 17 learned that somebody sexually abused a young girl,
14:12:02 18 a member of the congregation has abused a young
14:12:06 19 girl, confidentiality policy would require you to
14:12:10 20 keep that confidential, correct?

14:12:12 21 MR. MCCABE: Objection; incomplete
14:12:15 22 hypothetical; asked and answered.

14:12:17 23 BY MR. SHAFFER:

14:12:17 24 Q You can share it with other elders if you
14:12:20 25 learn that a -- let's say you learned that an elder

14:12:22 1 has sexually abused a girl in the congregation. Who
14:12:28 2 could you share that information without violating
14:12:29 3 the confidentiality policy?

14:12:33 4 A The elders themselves would -- would hear
14:12:36 5 of it and do it and then try to determine the
14:12:36 6 legitimacy. And then if they need to form a
14:12:40 7 committee that's fine. If they need to tell the
14:12:44 8 officials, they -- they have to do that too.

14:12:46 9 Q If sharing outside of the elders, that
14:12:48 10 would be prohibited by the confidentiality policy,
14:12:53 11 correct?

14:12:55 12 MR. MCCABE: Objection; incomplete
14:12:58 13 hypothetical. Vague as to time.

14:12:59 14 BY MR. SHAFFER:

14:12:59 15 Q Go ahead. You can answer.

14:13:00 16 The elders themselves can discuss it but
14:13:02 17 they couldn't share it outside the group of elders,
14:13:05 18 correct?

14:13:05 19 MR. MCCABE: Objection; same objection;
14:13:07 20 it's an incomplete hypothetical; it's vague as to
14:13:10 21 time.

14:13:13 22 BY MR. SHAFFER:

14:13:13 23 Q Go ahead, Mr. Lovett.

14:13:14 24 A I'm just trying to calculate this. But
14:13:19 25 normally we don't talk to anyone outside. Let's

14:13:22 1 say, you do -- it becomes a judicial matter, you
14:13:26 2 don't tell even the other -- the other elders. It's
14:13:30 3 kept between yourself --

14:13:32 4 Q Right.

14:13:34 5 A -- and the other -- other two guys.

14:13:35 6 Q And you certainly wouldn't tell the other
14:13:38 7 publishers in the congregation?

14:13:39 8 A No.

14:13:40 9 Q And so you wouldn't tell the rest of the
14:13:42 10 congregation that maybe there's an admitted child
14:13:46 11 molester in the congregation, would you?

14:13:50 12 MR. MCCABE: Objection; incomplete
14:13:52 13 hypothetical; it's vague as to time. You're asking
14:13:54 14 him to speculate. He's never dealt with such a
14:13:58 15 thing.

14:13:59 16 BY MR. SHAFFER:

14:13:59 17 Q Go ahead, Mr. Lovett.

14:14:00 18 A Ditto. There's -- as I've said, I have
14:14:05 19 not dealt with anything with that in particular.

14:14:08 20 Q Right. I'm asking you to apply the
14:14:11 21 confidentiality policy just like you said. You said
14:14:14 22 even -- even served elders in a congregation
14:14:15 23 wouldn't know what the results of a judicial
14:14:20 24 committee was, correct?

14:14:21 25 A Yeah. Well, it isn't even that. The --

14:14:29 1 when it's reported, then the brothers would try to
14:14:34 2 determine how serious it was, especially on a matter
14:14:37 3 like that. And -- and then they form their
14:14:43 4 committee. But you don't go talking about it --

14:14:46 5 Q Right.

14:14:47 6 A -- with anybody. And of course you inform
14:14:50 7 the Society. And then you -- they'll determine if
14:14:55 8 they're going to be able to do anything about it or
14:14:58 9 if there's enough evidence, that sort of thing.

14:15:01 10 Q You were talking about, and this is your
14:15:03 11 testimony, is that if there's a committee that's
14:15:05 12 form and they come to a conclusion about something
14:15:07 13 or a member confesses to a committee about an act of
14:15:12 14 wrongdoing, I think your testimony is that only --
14:15:14 15 only the elders in that committee would know about
14:15:17 16 that, correct?

14:15:18 17 A Uh-huh, that's correct.

14:15:19 18 MR. MCCABE: Objection; incomplete
14:15:22 19 hypothetical; and misstate his testimony.

14:15:23 20 BY MR. SHAFFER:

14:15:23 21 Q Did I misstate your testimony at all, Mr.
14:15:26 22 Lovett?

14:15:27 23 A Run it back.

14:15:27 24 Q Yeah. There's a judicial committee forum
14:15:28 25 that determines somebody acted wrong. Only the

14:15:31 1 elders in that committee would know about that,
14:15:33 2 correct?

14:15:34 3 A That's the -- that-- that's the normal
14:15:37 4 procedure.

14:15:37 5 Q Okay. Nobody else would --

14:15:38 6 A I'm just acting from my own experience
14:15:40 7 from what I've seen.

14:15:41 8 Q I understand, that's all I'm asking. All
14:15:43 9 I want you to do is give me your testimony based on
14:15:45 10 your experience. Which is like 30 years as a
14:15:49 11 circuit overseer, correct?

14:15:52 12 A Yes.

14:15:53 13 Q All right. Are you -- as a circuit
14:15:58 14 overseer are you an elder -- or excuse me. Are you
14:16:02 15 a member of the clergy?

14:16:04 16 A No.

14:16:04 17 Q Do they consider circuit overseers
14:16:08 18 elders?

14:16:08 19 A Yes.

14:16:09 20 Q So you've been an elder, your an elder
14:16:12 21 today?

14:16:13 22 A Yes.

14:16:14 23 Q All right. That's all I'm asking. Is
14:16:20 24 your experience based as an elder -- as an elder
14:16:23 25 for, and then I might be wrong here, over 40 years

14:16:27 1 is that right?

14:16:28 2 A Yeah, an elder, yeah.

14:16:30 3 Q All right. That's a lot of experience as
14:16:32 4 an elder in the Jehovah's Witness church, isn't
14:16:37 5 it?

14:16:37 6 A Well it is. There are so many of these
14:16:41 7 things you don't deal with on a regular basis and
14:16:45 8 sometimes never.

14:16:47 9 Q Confidentiality you deal with that
14:16:48 10 probably quite often?

14:16:51 11 A Uh-huh. Yes.

14:17:15 12 Q In your 40 or 50 years as an elder, are
14:17:19 13 you ever aware of a situation where a judicial
14:17:22 14 committee comes to a conclusion that someone has
14:17:26 15 committed a wrong and that that was announced -- the
14:17:29 16 specifics of what that person did was announced to
14:17:33 17 the congregation?

14:17:35 18 A No. I'm thinking. I can't recall anyone
14:17:44 19 ever getting explicit.

14:17:46 20 Q It's usually pretty vague. Like so and so
14:17:50 21 didn't take care of his family appropriately. Or
14:17:53 22 got too acquainted with a -- with a young girl, or
14:17:57 23 something like that, right?

14:17:58 24 A You don't -- you don't use that
14:17:59 25 description either. They've been reprov'd or

14:18:04 1 something like that, but you don't get into
14:18:06 2 details.

14:18:07 3 Q Okay. The details are confidential,
14:18:10 4 right?

14:18:12 5 A Suppose to be, yeah.

14:18:15 6 MR. SHAFFER: Okay. I think I'm almost
14:18:18 7 done so let's take five minutes.

14:18:23 8 VIDEOGRAPHER: We're now going off the
14:18:24 9 record. The time is 2:18 p.m.

14:39:18 10 (Recess taken.)

14:39:18 11 VIDEOGRAPHER: We are now going back on
14:39:20 12 the record. The time is 2:39 p.m.

14:39:25 13 BY MR. SHAFFER:

14:39:25 14 Q Mr. Lovett, we've talked a little bit
14:39:28 15 about situations that can result in a judicial
14:39:31 16 committee about a confession --

14:39:48 17 MR. TAYLOR: Is it possible to turn the
14:39:48 18 Zoom video back on?

14:39:48 19 COURT REPORTER: Oh, I thought I did.

14:39:48 20 All right. Here you go.

14:39:48 21 MR. TAYLOR: Thank you kindly.

14:39:48 22 BY MR. SHAFFER:

14:39:48 23 Q Confession is one circumstance where a
14:39:50 24 judicial committee would be formed, two or more
14:39:53 25 witnesses, correct?