

***Exhibit B***

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Nolen Saul Brelsford

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**FILED**

AFFIDAVIT OF DON ADAMS

FEB 10 1985

STATE OF NEW YORK )  
                          ) ss.:  
COUNTY OF KINGS )

Time 11:40 O'Clock A.M.  
EVA LINDSEY  
District Clerk, Tarrant Co., Texas  
By Lorraine E. Egan Deputy

I, Don Adams, after being duly sworn, depose and say:

1. I am over 21 years of age and reside at 124 Columbia Heights, Brooklyn, New York 11201. I have never been convicted of a felony or a crime of moral turpitude and I am competent to testify.

2. I am the Assistant Secretary-Treasurer of the Watchtower Bible and Tract Society of New York, Inc., and, as such, I am familiar with the books, records, publications and operating procedures of the Watchtower Bible and Tract Society of New York, Inc. I have personal knowledge of the facts set out herein and I am a custodian of the official records and publications described herein.

3. The Watchtower Bible and Tract Society of New York, Inc. is the parent organization of all congregations of Jehovah's Witnesses in the United States, including the Bonham Congregation of Jehovah's Witnesses located in Bonham, Texas.

4. It is the teaching and practice of Jehovah's Witnesses to follow the example of first century Christians. A Governing Body, at present comprised of thirteen men, direct all teaching, preaching, disciple-making and congregational activ-

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ities of Jehovah's Witnesses throughout the world. (See the basic organization manual of Jehovah's Witnesses, Organized to Accomplish Our Ministry, pages 10 and 25, and The Watchtower, the official semimonthly journal of Jehovah's Witnesses, "The Christian Congregation and Its Operation," October 1, 1977, page 598.)

5. Regarding the position of the Governing Body, Organized to Accomplish Our Ministry states at page 28:

All in the organization recognize God's way of theocratic control. The congregations acknowledge and conform to the guidance of the Governing Body as it outlines organizational arrangements for the benefit of all.

6. To implement their decisions, the Governing Body uses a hierarchial organization together with corporate entities, when appropriate, to accomplish its worldwide work of teaching and declaring the good news of God's established Kingdom. The principal corporation used by the Governing Body is the Watch Tower Bible and Tract Society of Pennsylvania. (See Organized to Accomplish Our Ministry, page 26.)

7. Under the Watch Tower Bible and Tract Society of Pennsylvania, the Governing Body directs 95 branches through Branch Committees that report their progress to the Governing Body and implement the directives of the Governing Body in a uniform manner. (See Organized to Accomplish Our Ministry, pages 26 and 27.)

8. The Watchtower Bible and Tract Society of New

York, Inc. is a branch used to administer to the needs of Jehovah's Witnesses in the United States. (See Organized to Accomplish Our Ministry, pages 26 and 27.)

9. The United States Branch is part of a zone, which is supervised by a Zone Overseer. Organized to Accomplish Our Ministry states at page 53:

Periodically, arrangements are made by the Governing Body to have qualified brothers serve each of the branches throughout the earth.

These visits are comprehensive and cover every aspect of the branch's activities. A primary objective is to assure that each branch is working in harmony with the directives of the Governing Body.

10. Each zone is made up of districts. Each district is supervised by a District Overseer. Organized to Accomplish Our Ministry states at page 51:

The district overseer is a traveling elder who is also appointed by the Governing Body and assigned by the branch office to serve a number of circuits that comprise a district.

At regular intervals, the District Overseer reports to the branch on the progress and spiritual health of the circuits which make up the district to which he is assigned. Like the Zone Overseer, he is charged with the responsibility to assure that all of the activities in the district conform to the directives of the Governing Body. (See Organized to Accomplish Our Ministry, pages 51 and 52.)

[It is Jehovah's arrangement and he will hold the overseers responsible for their actions. They are representing him and his theocratic rule. He will remove from office (through the actions of the Governing Body) those overseers who fail to manifest the fruitage of the spirit and whose pattern of life falls short of the Scriptural requirements.

(Also See Organized to Accomplish Our Ministry, pages 41-53.)

14. The responsibility of all of these positions is to assure the unity and oneness of the congregations throughout the world with the direction of the Governing Body. (See Organized to Accomplish Our Ministry, page 54.)

15. Each position is filled by appointment from the Governing Body and each appointed representative is required to cooperate with the Governing Body. (See Organized to Accomplish Our Ministry, page 41 and The Watchtower, "The Christian Congregation and Its Operation," October 1, 1977, page 598.)

16. Appointed representatives within the congregations fall into two categories, elders or overseers and ministerial servants. (See Organized to Accomplish Our Ministry, pages 28 to 40 and The Watchtower, "The Christian Congregation and Its Operation," October 1, 1977, pages 599 to 601.)

17. It is the responsibility of the body of elders to see that the congregation is managed according to the directives of the Governing Body. In harmony with these directives, each body of elders has specific responsibilities to be filled by qualifying elders. Each congregation has the following positions to be filled: the presiding overseer, secretary, service

03/30/05 13:10 FAX 918 564 9991

Nolen Saul Brelsford

039

overseer, Watchtower Study conductor and Theocratic Ministry School overseer. Organized to Accomplish Our Ministry states at page 42:

The presiding overseer serves as chairman at the meetings of the body of elders. Communications and important records of the congregation are handled by the secretary who keeps the elders informed about important communications. Arrangements for field activity and other service-related matters come under the direction of the service overseer.

18. There are five scheduled meetings of worship which each member of the congregation attends. While these meetings are conducted by the local body of elders in each congregation, the material covered in the meetings is prescribed by the Governing Body in order to assure that all of the congregations are receiving the same information and direction. (See The Watchtower, "The Christian Congregation and Its Operation," October 1, 1977, pages 601 to 603.)

19. One area in which the body of elders would conduct matters for the benefit of the congregation and subject to the Governing Body would be in the area of buying or selling real estate to be used by the local congregation as a place of worship know as the Kingdom Hall.

20. By "Memorandum on Kingdom Halls" from Hayden C. Covington, General Counsel for Watchtower Society and Jehovah's Witnesses, dated September 1960, bodies of elders in the United States Branch received instructions regarding ownership of Kingdom Halls. Under the subheading, "Relationship Between

03/30/05 13:10 FAX 916 564 9991

Nolen Saul Brelsford

040

Congregation and Titleholders," the memorandum states in part:

When either a corporation or trustee arrangement is made and title to property is vested in the corporation or trustees, the titleholders have the same relationship to the congregation as does any other instrument, equipment or property necessary to carry out the work of the congregation, which is preaching the good news in the assigned territory and holding meetings. All such instruments or tools are used to serve the congregation in harmony with the theocratic government.

The mere fact that a legal corporation or trustee arrangement has been made does not mean that a separate organization has been formed that can function separately and apart from the congregation and be used to guide and direct its policies. The titleholders (trustees or corporation) are merely special servants of the congregation in whom is vested legal title to the Kingdom Hall. Titleholders as such do not act as a part of the congregation committee to operate the Kingdom Hall or run the business of the congregation. They have absolutely nothing to do with the use to be made of the property and cannot determine who is going to live on the property or what kind of work is to be done in it.

The operation of the Kingdom Hall, making of repairs and improvements, payment of expenses and obligations and all other business in connection with owning and maintaining the property are all under the direction of the theocratic organization through the elders and ministerial servants appointed by the Society.

21. By memorandum entitled "Information Regarding Ownership of Kingdom Halls" from the Office of the Secretary and Treasurer of the Watch Tower Bible and Tract Society of Pennsylvania, dated April 1, 1982, similar language defines the relationship between congregation and titleholders:

The mere fact that a legal corporation or trustee arrangement has been made does not mean that a separate organization has been formed that can function separately and apart from the congregation and be used to guide and direct its policies. The titleholders (trustees or corporation) are merely special servants

03/30/05 13:10 FAX 916 584 9991

Nolen Saul Brelsford

041

of the congregation in whom is vested legal title to the Kingdom Hall. The titleholders as such do not act as a part of the committee to operate the Kingdom Hall or run the business of the congregation. The titleholders, as such, have absolutely nothing to do with the use to be made of the property. They cannot determine who is going to live on the property or what kind of work is to be done in it.

The operation of the hall, making repairs and improvements, payment of expenses and obligations and all other business in connection with owning and maintaining the property are all under the direction of the theocratic organization through the elders and ministerial servants appointed by the Society.

22. The trustees holding title for any Kingdom Hall resemble the "Trustees" which held title to the church property which was the subject of the controversy in a landmark United States Supreme Court case, Watson v. Jones, 80 U.S. 679 at 681:

Connected with each local church, and apparently without any functions in essence ecclesiastically, are what are called the "Trustees;" three persons usually, in whom is vested for form's sake, the legal title to the church edifice and other property; the equitable power of management of the property being with the Session. These Trustees are usually elected biennially; they are subject to the Session, and may be removed by the congregation.

23. In 1964 when the Bonham Congregation secured a mortgage through the Watchtower Bible and Tract Society, it was determined by vote from the congregation that it would be willing to contribute to cover the expenses of a mortgage and contemplated construction expenses. All matters were handled between the body of elders and Watchtower Bible and Tract Society of New York, Inc. acting in harmony with the directives of the Governing Body as expressed in the above-mentioned correspondence and other publications of the Watchtower Bible and Tract Society

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03/30/05 13:10 FAX 916 564 9991

Nolen Saul Brelsford

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of New York, Inc.

24. By notice dated June 4, 1985, the following duly appointed elders of the Bonham Congregation of Jehovah's Witnesses were deleted from their appointed positions and are no longer elders of Jehovah's Witnesses: (1) Wendel Baker; (2) Trymer L. Berry; (3) James E. Coleman; (4) Ralph E. Deal; and (5) Tony M. Jones.

25. There are currently four duly appointed elders in the Bonham Congregation of Jehovah's Witnesses who are recognized by the Governing Body of Jehovah's Witnesses. They are (1) Luther Brogdon; (2) Richard L. Scofield; (3) Ronald H. Williams; and (4) Bennie Bolin. Their dates of appointment were (1) Luther Brogdon—July 4, 1985; (2) Richard L. Scofield—June 4, 1985; (3) Ronald H. Williams—November 28, 1985; and (4) Bennie Bolin—November 28, 1985.

26. From the dates of their appointment, the above-mentioned duly appointed elders (Luther Brogdon, Richard L. Scofield, Ronald H. Williams, and Bennie Bolin) have had the duty and responsibility to insure that the Kingdom Hall property located at 1105 Pecan Street, Bonham, Texas, is properly cared for and secured on behalf of the Bonham Congregation of Jehovah's Witnesses.

27. Each Kingdom Hall owned by Jehovah's Witnesses, including the Bonham Kingdom Hall, is dedicated solely to the worship and service of Almighty God Jehovah by means of a solemn

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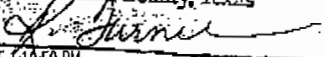
03/30/05 13:11 FAX 916 564 9991

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I hereby certify that the aforesaid is a true and correct copy on file or of record in the 330th Judicial District Court, Fannin Co., Texas, signed and sealed this 18th day of Feb. 2004 A.D.

Rochelle Turner  
Clerk, District Courts,  
Fannin County, Texas



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