

Exhibit KK

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

TRACY CAEKAERT, and
CAMILLIA MAPLEY,

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

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

Defendants,

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

VIDEO-RECORDED
DEPOSITION UPON ORAL
EXAMINATION OF DELBERT
HIEBERT

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Plaintiffs,

Cause No.
CV 20-59-BLG-SPW

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

Defendants.

Delbert Hiebert

1 '79, to your knowledge?

2 A. I believe he was.

3 Q. And so as an Elder in Hardin, you've never
4 dealt with these forms before?

5 A. I have never had to deal with these forms.
6 They might have -- they will have obviously been
7 sent from the branch to the congregation
8 acknowledging this appointment, but I had no reason
9 to see it.

10 Q. And so your understanding is this was sent
11 from the branch to the congregation?

12 A. This is my guess that this is what it is,
13 you know. I've never seen one of these before,
14 so...

15 Q. Okay. Well, let's go through -- let's
16 just go through some of the information contained
17 in it and see if that's something that you can
18 speak to.

19 So under Martin Svensen's name and an
20 address there, do you see where it says, "Governing
21 Body of Jehovah's Witnesses" on page 1 of --

22 A. Correct.

23 Q. -- Exhibit 13?

24 What is the governing body of Jehovah's
25 Witnesses?

Delbert Hiebert

1 A. The governing body is a group of Elders
2 that care for providing literature worldwide. They
3 help to understand the doctrines of the Bible.
4 I've never been asked that question before.
5 They're -- obviously they're -- they review
6 recommendations for Elders and have the final say
7 whether a man is appointed as an Elder. At least
8 they did at that time.

9 Q. Do you know if that's changed?

10 A. Yes. Recently that's -- the circuit
11 overseers do the appointing. The circuit overseers
12 in the nineties would forward the recommendation
13 from a body of Elders to the branch, and then the
14 recommendation would be approved or disapproved.

15 And recently, I don't know when this took
16 place, but in the past few years, that has changed
17 where circuit overseers have been given that
18 authority.

19 Q. When you say, "the branch," what are you
20 referring to as the branch?

21 A. The branch of the Watchtower Society, like
22 New York -- the New York branch. There's branches
23 all around the world, and that's the branch of the
24 United States.

25 Q. Okay. The United States branch.

Delbert Hiebert

1 A. Yes, the United States branch.

2 Q. I see.

3 A. And which is headquarters.

4 Q. And what do you -- what's headquarters?

5 A. The worldwide headquarters is --
6 that's in -- is the New York branch, but there are
7 Germany branch and, you know, Mexico,
8 South America.

9 Q. Okay. That makes sense. Thank you.

10 A. Okay.

11 Q. And you mentioned circuit overseers.
12 What's a circuit overseer? What do they do?

13 A. He's a traveling overseer who usually has
14 a dozen or so congregations that he travels around
15 to to encourage, and kind of checks up on things,
16 makes sure that the territory's being covered;
17 that, you know, in our ministry, you know, we kind
18 of make -- that's our job is to preach the good
19 news of the kingdom. And that's the whole effort
20 of our organization is to make sure everybody gets
21 a chance to hear the -- our message.

22 And the circuit overseer, he travels
23 around, spends a week with each congregation. And
24 usually twice a year he comes by and -- just to
25 encourage the congregation, encourage the body of

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1 Elders, and give any needed direction that we need.

2 Q. And do you have an understanding of who
3 the circuit overseer -- prior to the time that you
4 said it changed, where they became the ones who
5 oversaw the appointment of Elders, prior to that
6 time, did you have an understanding of who the
7 circuit overseers reported to?

8 A. Who they report to?

9 Q. Yes.

10 A. To the New York branch.

11 Q. And is the New York branch the name as the
12 governing body?

13 A. The governing body is the governing body.
14 The branch is -- is under the direction, I suppose,
15 of the governing body. You know, they're -- as far
16 as teachings, you know, and providing -- being
17 provided with materials, you know, publisher --
18 publications and so on.

19 What was the question again, the
20 difference between --

21 Q. The governing body and the branch as you
22 described it.

23 A. Well, yeah, branches are all over the
24 world. The governing body just happens to be
25 located in the buildings of the New York branch.

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1 Q. And what is your understanding of the
2 governing body's relationship to the branches? I
3 guess maybe that would be a better question.

4 A. Well, the branches are in charge of their
5 territory to provide literature and direction to
6 the congregations to, you know -- you know, to
7 provide materials for them and encouragement.

8 The governing body provides encouragement
9 and the shepherding, more or less, to all of the
10 branches so that we're in unison. Our -- our --
11 their goal is to keep our organization harmonious.

12 Q. I see. And how do you understand that
13 they do that, keep everything in unison and keep
14 things harmonious?

15 A. Well, provide the literature that we all
16 use worldwide. The Watchtower magazine. We print
17 bibles. Bible education materials. And we're
18 all -- to keep everybody on the same page. When we
19 conduct a Watchtower study in our branch, it's the
20 same as in the German branch or Switzerland or
21 wherever, you know.

22 Q. And is that because -- you identify the
23 publications -- is that because the publications
24 are consistent throughout --

25 A. Yes.

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1 direction in helping the judicial committee do
2 that?

3 A. Well, there are Elder schools where we're
4 helped to determine, for instance, whether --
5 whether the wrongdoer is repentant, which might --
6 it can change things. In certain cases, it can
7 change to whether a person is disfellowshipped or
8 whether he is reprovved before the congregation
9 where an announcement has been made that so-and-so
10 has been reprovved so that anybody who knew of this
11 wrongdoer would know that he's been dealt with.

12 Q. And when you say that there are Elder
13 schools, did you attend one?

14 A. Uh-huh. Several.

15 Q. And tell me, if you would, what were you
16 told or taught about how to determine whether or
17 not someone was repentant or truthful in their
18 repentance?

19 A. Had they stopped, or were they still doing
20 it. That's the main factor there. Have they made
21 apologies, if that was necessary, to the one that
22 they had done wrong to. Was there signs that they
23 really truly were repentant over what they'd done.
24 If there was no signs, then of course that
25 determines the outcome too, you know.

Delbert Hiebert

1 Q. Anything else that you were taught in the
2 Elder schools about judicial committees?

3 A. Well, the one real factor that is if
4 there's any inclination that there is something
5 illegal, that -- call the branch's legal department
6 immediately. Don't go push ahead on your own
7 without -- without direction from legal.

8 Q. Any of the Elder schools that you went to,
9 did you learn how to speak with victims of a crime
10 or alleged victims of a crime?

11 A. How to speak to them. I guess I really
12 don't -- I don't recall. You know, they're -- yes,
13 I remember one. There was a video. It was kind of
14 like a reenactment type of thing, a scenario. This
15 and thus happened, and so how would you respond to
16 that. You know, like -- do you want to hear a for
17 instance?

18 Q. Please, yeah, if you can give me the
19 example. And when -- do you know approximately
20 when the video that you're talking about, when you
21 saw it and when it was made?

22 A. It's been since I was an Elder in the
23 early 2000's. It was in Billings here at the
24 Billings Heights Kingdom Hall.

25 And there was a video showing where, for