

Exhibit M

Index of Nonresponsive Answers
12/6/2023 Deposition of Allen Shuster

- 1) Page 52; Lines 13-25; Page 53; Lines 2-10
- 2) Page 60; Lines 21-25; Page 61; Lines 2-4
- 3) Page 61; Lines 8-17
- 4) Page 75; Lines 19-25; Page 76; Lines 2-23
- 5) Page 80; Line 25; Page 81; Lines 2-16
- 6) Page 86; Lines 14-23
- 7) Page 87; Lines 3-13
- 8) Page 91; Lines 11-24
- 9) Page 100; Lines 15-20
- 10) Page 103; Lines 16-20
- 11) Page 104; Lines 4-12
- 12) Page 105; Lines 9-15
- 13) Page 119; Lines 18-23
- 14) Page 121; Lines 6-23
- 15) Page 129; Lines 23-25; Page 130; Lines 2-7
- 16) Page 130; Lines 8-17
- 17) Page 138; Lines 22-25; Page 139; Lines 2-7
- 18) Page 146; Lines 21-25; Page 147; Lines 2-3
- 19) Page 147; Lines 4-15
- 20) Page 160; Lines 12-21
- 21) Page 163; Lines 20-25; Page 164; Lines 2-21
- 22) Page 165; Lines 4-18
- 23) Page 169; Lines 4-14
- 24) Page 169; Lines 22-25; Page 170; Lines 2-20
- 25) Page 172; Line 25; Page 173; Lines 2-7
- 26) Page 172; Lines 8-20
- 27) Page 184; Lines 13-17
- 28) Page 190; Lines 15-20
- 29) Page 190; Lines 24-25; Page 191; Lines 2-8
- 30) Page 199; Lines 10-24
- 31) Page 205; Lines 13-18
- 32) Page 217; Lines 12-22

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

TRACY CAEKAERT and CAMILLIA MAPLEY,
PLAINTIFFS,

- against -

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.

-----X
ARIANE ROWLAND and JAMIE SCHULZE,

PLAINTIFFS,

- against -

Case No:
CV-20-59-BLG-SPW

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

DEFENDANTS.

-----X

DATE: December 6, 2023

TIME: 9:09 A.M.

VIDEO-RECORDED EXAMINATION
BEFORE TRIAL of the Non-Party Witness,
ALLEN SHUSTER, taken by the Plaintiffs,
pursuant to a Subpoena, held at the offices

1 A. SHUSTER

2 Q. Did you provide an application
3 to become an elder?

4 A. No.

5 Q. How did you become an elder?
6 Can you please describe the process?

7 You -- you presumably didn't
8 decide yourself that you were an elder. Is
9 that correct?

10 A. That is --

11 MS. KORFUL: Objection --

12 A. -- correct.

13 MS. KORFUL: -- to the --
14 objection to the form. You can
15 answer.

16 A. Read -- repeat the question,
17 please.

18 Q. You didn't decide that you
19 yourself were an elder; correct?

20 A. That's correct.

21 Q. Now, can you tell me how you
22 came to be an elder?

23 A. I don't know the process. I
24 really don't.

25 Q. You don't know the process

1 A. SHUSTER

2 today or you don't know what the process
3 was at the time?

4 A. I don't know what the process
5 was. I don't know how it happened. Just
6 announced I'm an elder.

7 Q. Who announced it?

8 A. I don't remember who it was.
9 One of the elders in the congregation I was
10 associated with.

11 Q. Do you recall the name of that
12 congregation?

13 A. Columbia.

14 Q. Is there a state?

15 A. Yeah. In New York.

16 Q. Thank you.

17 A. New York City.

18 Q. Do you know if there was a
19 written document that memorialized your
20 appointment as an elder?

21 A. I do not.

22 Q. Do Jehovah's Witness elders
23 have duties within the religious
24 organization of Jehovah's Witnesses?

25 MS. KORGUL: I will object

1 A. SHUSTER

2 A. They go to the congregation
3 secretary.

4 Q. And that's a position within
5 each congregation. Is that correct?

6 A. That's correct.

7 Q. Is that where those reports
8 that we're discussing went in the 1970s to
9 1990s?

10 A. That's correct.

11 Q. Was the congregation secretary
12 an elder in the period of the 1970s to
13 1990s?

14 MS. KORFUL: Are you talking
15 about specific congregation or every
16 congregation? I will -- I will
17 object to the form.

18 Q. You can answer.

19 A. It would be an elder for the
20 most part, yeah.

21 Q. Do elders provide reports about
22 anything besides the field ministry during
23 the period of the 1970s to 1990s?

24 MS. KORFUL: Objection to the
25 form.

1 A. SHUSTER

2 A. Yeah. I'm not sure what
3 you're -- what you're referring to. I
4 don't know.

5 Q. You were an elder during the
6 1980s; correct?

7 A. That's correct.

8 Q. Did you provide any reports
9 besides reports of field ministry?

10 A. I'm not sure what you're
11 talking about.

12 Q. Do elders ever incur expenses
13 as part of their work with the religious
14 organization of Jehovah's Witnesses?

15 MS. KORGUL: Objection to the
16 form.

17 A. I don't know.

18 Q. Did you ever incur expenses as
19 an elder?

20 A. Personally, I've incurred
21 expenses. I wouldn't say it's in the --
22 because I'm an elder. I'm a volunteer, and
23 I have spent money going back and forth to
24 our congregation meetings on a regular
25 basis. So that -- from that standpoint,

1 A. SHUSTER

2 States?

3 A. No.

4 Q. Is there any other committee,
5 organization or department within the
6 religious organization of Jehovah's
7 Witnesses that approved or confirmed the
8 appointment of elders within Jehovah's
9 Witness congregations in the United States
10 during the 1970s to 1990s timeframe?

11 A. No.

12 Q. Is it correct that the
13 appointment of elders to congregations of
14 Jehovah's Witnesses in the United States
15 during the 1970s to 1990s timeframe was
16 made solely by the elders within each
17 congregation?

18 A. Correct.

19 Q. Do you currently have any
20 responsibilities or duties related to
21 allegations of child sex abuse within
22 congregations of Jehovah's Witnesses --

23 MS. KORFUL: Objection.

24 Q. -- in the United States?

25 MS. KORFUL: I'm sorry.

1 A. SHUSTER

2 Objection to the form. You can
3 answer.

4 A. Can you repeat the question,
5 please?

6 MR. MERRILL: Please do.

7 (Whereupon, the referred to
8 question was read back by the
9 Reporter.)

10 MS. KORGUL: Same objection.

11 A. I don't know.

12 Q. Did you have any involvement
13 with allegations of child sex abuse within
14 Jehovah's Witness congregations in the
15 United States between 1973 and 1992?

16 A. I don't know.

17 Q. Is that something that you
18 would've forgotten?

19 A. It's a long time ago, that's
20 for sure.

21 Q. Is that something you would've
22 forgotten?

23 A. I don't think so.

24 Q. In your time at the service
25 department, did you ever correspond with

1 A. SHUSTER

2 the 1990s as well?

3 A. Yes.

4 Q. Do you ever report to any
5 person or entity in your role in the
6 service department?

7 A. I'm not sure. I don't know.

8 Q. Are you provided with a stipend
9 or money allowance related to your position
10 in the service department?

11 MS. KORFUL: Objection to the
12 form.

13 A. No.

14 Q. Where do you live?

15 A. Walkill, New York.

16 Q. Do you own the property where
17 you live?

18 A. I do not.

19 Q. Do you rent the property where
20 you live?

21 A. I do not.

22 Q. Who owns the property where you
23 live or what entity? Excuse me.

24 A. Yeah. I don't know.

25 Q. Is the property where you live

1 A. SHUSTER

2 associated with the Jehovah's Witness
3 organization?

4 MS. KORFUL: Just object to the
5 form.

6 A. Is the entity I live -- say it
7 again, please, the question.

8 Q. Is the property where you live
9 associated with the religious organization
10 of Jehovah's Witnesses?

11 A. I don't know.

12 Q. Do you pay for the food that
13 you eat?

14 MR. TAYLOR: Just objection to
15 the form.

16 A. The answer would be no.

17 Q. Do you know how that food is
18 provided for you or how it comes to be in
19 front of you?

20 A. Some of it is provided by
21 Bethel for us. Other food I -- we
22 purchase -- my wife and I purchase through
23 our own -- own funds.

24 Q. Does Bethel provide housing for
25 you?

1 A. SHUSTER

2 unless there is a request for an exception
3 to that, and sometimes there are
4 exceptions.

5 Q. And an exception would mean
6 that a member of the Order could have an
7 employment or job position outside of the
8 Jehovah's Witness religious organization?

9 A. That's correct.

10 Q. And that person would still be
11 subject to a vow of poverty. Is that
12 correct?

13 A. That's correct.

14 Q. Is there an expectation as to
15 what they would do with the money they
16 earned in their job or outside position in
17 order to uphold that vow while being a
18 member of the Order? And I'll stop there.

19 MS. KORFUL: Objection to the
20 form.

21 A. Yeah. Yeah. I --

22 MS. KORFUL: You can answer.

23 A. I don't know.

24 Q. Does one have to apply to
25 become a member of the Order?

1 A. SHUSTER

2 A. No.

3 Q. Does one have to be appointed
4 to become a member of the Order?

5 MS. KORGUL: I'll object to the
6 form.

7 A. Don't know the process.

8 Q. Do you know whether anyone has
9 ever been expelled from the Order?

10 A. I don't know.

11 Q. Is there a leader of the Order?

12 A. That's a pretty vague question.
13 I don't know.

14 Q. What does the word leader mean
15 to you?

16 A. A chief, an overseer.

17 No. I -- I'm not -- that's how
18 I would -- that's how I would define a
19 leader, but there's no leader --

20 Q. How would you define --

21 A. -- of the Order.

22 Q. Excuse me. I'm sorry.

23 A. No. It's okay.

24 Q. How would you define overseer?

25 A. Someone who takes the lead,

1 A. SHUSTER

2 know. I can't specifically state a date.

3 Q. Do you know whether the Kingdom
4 Ministry School existed or occurred in the
5 1970s?

6 A. Yes. It did occur in the
7 1970s.

8 Q. Did it also occur in the 1980s
9 and 1990s?

10 A. Yes.

11 Q. Based on the word school in
12 Kingdom Ministry School, it sounds like
13 certain individuals would attend the school
14 as pupils or students. Is that correct?

15 MS. KORGUL: Objection to the
16 form. You can answer.

17 A. Ministerial servants, elders
18 would attend.

19 Q. Are all -- excuse me.

20 How many instructors are there
21 at a Kingdom Ministry School currently or
22 the most recent one? Excuse me.

23 A. I don't -- I don't know.
24 Couldn't say.

25 Q. Do you recall the approximate

1 A. SHUSTER

2 abuser, what do you mean by that?

3 Q. Known to the elders within the
4 congregation of which that publisher is a
5 member.

6 A. And the answer, I think, would
7 be possibly.

8 Q. Could you describe for me the
9 circumstances under which that would or
10 would not be allowed?

11 MS. KORGUL: Objection to the
12 form of the question.

13 MR. MERRILL: Let me try and
14 re-ask the question.

15 Q. Can you describe to me the
16 circumstances in which that would or would
17 not be allowed during the 1970s to 1990s?

18 MS. KORGUL: Objection. You
19 can answer.

20 A. Yeah. I don't know.

21 Q. Did you ever have that
22 knowledge?

23 A. I -- I'm sorry. The question's
24 just so vague. I can't quite answer it.
25 It's just -- it's not -- it's not specific

1 A. SHUSTER

2 A. I don't know of any.

3 MR. MERRILL: Do you have a
4 basis for your objection that you'd
5 like to state, Mr. Taylor?

6 MR. TAYLOR: I object to the
7 form of the question. But more
8 importantly, it was harassing and
9 demeaning. That's why I objected.

10 Q. Are publishers ministers?

11 A. No.

12 The question -- are publishers
13 ministers? A publisher can be an ordained
14 minister if he's baptized, but he can also
15 be a publisher if he's not baptized.

16 Q. Do you know whether publishers
17 are able to speak for Jehovah's Witnesses?

18 MR. TAYLOR: Objection to the
19 form.

20 A. I don't know.

21 Q. Do Jehovah's Witnesses have
22 locations where they hold meetings?

23 A. Yes.

24 Q. Are the locations where
25 congregations held meetings during the

1 A. SHUSTER

2 1970s to 1990s known as Kingdom Halls?

3 A. Yes.

4 Q. How many times a week would
5 members of a congregation of Jehovah's
6 Witnesses be expected to attend a meeting
7 in a Kingdom Hall during the 1970s to
8 1990s?

9 MS. KORGUL: Objection to the
10 form.

11 A. I don't know that they'd be
12 expected to do anything.

13 Q. Do elders organize meetings
14 among congregations of Jehovah's Witnesses
15 at Kingdom Halls?

16 A. I wouldn't say elders do, no.

17 Q. Is there any members of the
18 congregation who organize meetings at
19 Kingdom Halls?

20 A. I don't know.

21 Q. Have you ever attended a
22 meeting at a Kingdom Hall?

23 A. Yes.

24 Q. How did you know what time to
25 show up?

1 A. SHUSTER

2 A. The time has been set by the
3 elders. So from that perspective, yes. I
4 can see the elders set the time of the
5 meeting.

6 Q. Do elders speak at the
7 meetings?

8 A. Yes.

9 Q. During the 1970s to 1990s, are
10 you aware of whether elders ever set times
11 for meetings among Jehovah's Witness
12 congregants that were not at Kingdom Halls?

13 MS. KORFUL: Objection to the
14 form.

15 A. Yeah. I'm not sure.

16 Q. Are you aware of whether there
17 was ever a regular practice of meetings in
18 private homes by small groups of Jehovah's
19 Witnesses prior to 1996?

20 A. Yes.

21 Q. Tell me about that, please.

22 A. They were called book studies.
23 Conduits would come and discuss Bible
24 verses, Bible literature.

25 Q. Where did book studies occur?

1 A. SHUSTER

2 to the Governing Body. Also at times, the
3 Governing Body may authorize certain
4 representatives to make appointments of
5 overseers."

6 Q. Is there a difference here, do
7 you know, between the term overseers and,
8 we've discussed, the term elders?

9 A. Well, I'm not sure I can answer
10 for myself. I'm not quite sure I
11 understand completely the difference
12 between overseer and elder in the context
13 you're referring to.

14 Q. Are you aware of any
15 differences that you could explain to me
16 right now?

17 A. No.

18 Q. Do you have any reason to
19 disagree with the contents of the paragraph
20 you just read me?

21 MS. KORGUL: Object as to the
22 form.

23 A. I don't know.

24 Q. Let's look at page 144.

25 Okay. Do you see a paragraph

1 A. SHUSTER

2 that should be reported to the elders and
3 handled by them. When the law covenant was
4 enforced, these sins required more than
5 forgiveness from an offended individual."

6 Q. That second half of the
7 paragraph describes serious sins. Is that
8 a fair characterization?

9 MS. KORGUL: Objection to the
10 form. You can answer.

11 A. The question again, please,
12 just so I understand it clearly.

13 Q. Do you understand the paragraph
14 to be making a distinction between certain
15 types of sins that there -- where there's
16 no need to carry the matter further and
17 other sins where the law covenant was
18 enforced and the sins required more than
19 forgiveness for an offended individual?

20 MS. KORGUL: I will object to
21 this on the basis of form and First
22 Amendment grounds. You can answer.

23 A. Yeah. I'm -- I don't know.

24 Q. Do you see the list after the
25 word offenses that says fornication,

1 A. SHUSTER

2 A. In my -- in my view, my brief
3 review, it appears to be the questions that
4 one is asked to get baptized.

5 MR. MERRILL: Let's take a
6 lunch break. Can we agree to go off
7 the record?

8 MS. KORGUL: Sure.

9 THE VIDEOGRAPHER: We are off
10 the record. The time is 12:07 P.M.
11 Eastern Time.

12 (Whereupon, a short recess was
13 taken.)

14 THE VIDEOGRAPHER: We are back
15 on the record. The time is 1:20 P.M.
16 Eastern Time.

17 Q. Good afternoon, Mr. Shuster.

18 A. Good afternoon.

19 Q. You testified this morning that
20 you became an elder in what year again?
21 I'm sorry.

22 A. 1979.

23 Q. Do you remember approximately
24 when you first saw any type of policy or
25 procedure associated with the religious

1 A. SHUSTER

2 organization of Jehovah's Witnesses for
3 handling allegations of child sex abuse?

4 MS. KORGUL: I will object to
5 the form. You can answer.

6 A. I don't recall, no. I don't
7 know.

8 Q. Do you have any knowledge of
9 specific policies or procedures related to
10 handling allegations of child sex abuse
11 within the religious organization of
12 Jehovah's Witnesses prior to 1981?

13 MS. KORGUL: I will object to
14 the form, specifically, policies --
15 the word -- use of the word policies.
16 You can answer.

17 A. I don't know.

18 Q. Do you know what the word
19 policies means?

20 A. I'd have to have it defined.

21 Q. Do you know what the word
22 procedures means?

23 A. I'd have to have it defined.

24 Q. You told me earlier that
25 Jehovah's -- you and Jehovah's Witnesses,

1 A. SHUSTER

2 defined for me to -- I've heard of it, yes.

3 Q. What does the concept of
4 repressed memories mean to you?

5 A. I don't know. Excuse me. I --
6 I'd have to -- I'd have to look at the
7 definition and get a correct understanding
8 of it.

9 Q. Where would you see that
10 defined?

11 A. I'm not sure where we would
12 define that.

13 Q. Do you know whether the
14 Governing Body ever approved the
15 requirement of two or more witnesses to
16 substantiate an allegation of child sex
17 abuse?

18 A. I don't know. I'm not a member
19 of the Governing Body, so I don't know.

20 Q. Have you ever known that?

21 A. No.

22 Q. If a member of a congregation
23 is sexually abusing a child and the two of
24 them are always alone -- it's just the two
25 of them when the abuse occurs -- and the

1 A. SHUSTER

2 abuser does not confess, do you agree there
3 would only be one witness?

4 MS. KORFUL: Objection to the
5 form. You can answer.

6 A. Yeah. It's a complex question.
7 I don't know.

8 Q. What more would you need to
9 know to answer that question?

10 A. I'm sorry. I didn't hear you.

11 Q. What more would you need to
12 know to answer my previous question?

13 A. I think if you could simplify
14 the question. I mentioned it was complex.

15 Q. So we have one abuser, we have
16 one child being abused. Are you with me so
17 far?

18 A. Okay.

19 Q. This is a hypothetical
20 situation, and the abuse is child sex
21 abuse. Are you still with me?

22 A. Mm-hmm.

23 Q. And the child that's been
24 abused brings an accusation against the
25 abuser in the congregation. Are you still

1 A. SHUSTER

2 the elders.

3 Q. The document says that if the
4 accuser persists, at the beginning of the
5 second paragraph, they should confront the
6 accuser themselves; correct?

7 A. That's the first -- second
8 paragraph that begins with "However"?

9 Q. Yes. Do you see that?

10 A. I do.

11 I think the context, my
12 understanding, would be that if -- if an
13 adult is the victim and she's agreeable to
14 discussing it with the elders, then that
15 certainly would be her right.

16 If it's a child, we would not
17 address the child. We would address the
18 parents or ask the child to put it in
19 writing with -- with the parents'
20 permission.

21 Q. And the understanding you just
22 testified to is not what the document says;
23 correct?

24 MR. TAYLOR: Just objection to
25 the form.

1 A. SHUSTER

2 A. I'm not sure what you're
3 meaning.

4 Q. Are you aware of any document
5 that describes the process you just
6 mentioned where depending on the age of the
7 accuser, a different procedure would be
8 followed regarding confronting the accused?

9 MS. KORFUL: Objection to the
10 form.

11 A. Yeah. I don't remember.

12 Q. You couldn't point me to
13 anything today that would substantiate the
14 answer you just provided; correct?

15 A. Not to my knowledge, yeah.

16 Q. When elders hear certain
17 accusations in a congregation -- not just
18 child sex abuse allegations but allegations
19 of one congregant against another --
20 there's an expectation of confidentiality.
21 Is that correct?

22 A. There is.

23 Q. Is that based on a biblical
24 principle of some kind?

25 A. It's based on the clergy

1 A. SHUSTER

2 MR. MERRILL: Could I please
3 have tab 27 marked?

4 (Whereupon, a Watchtower Bible
5 and Tract Society of New York
6 document was marked as Plaintiffs'
7 Exhibit 6 for identification as of
8 this date by the Reporter.)

9 Q. Mr. Shuster, I'm going to hand
10 you Exhibit No. 6.

11 A. Okay.

12 Q. Please take a moment to look at
13 that document.

14 This is a letter from
15 Watchtower Bible and Tract Society of New
16 York, Inc., to all bodies of elders. Is
17 that correct?

18 MS. KORFUL: Objection to the
19 form.

20 A. Yeah. I don't remember the
21 details of this.

22 Q. Have you ever seen it before?

23 A. I think I have.

24 Q. This letter or document
25 includes a heading in the right column on

1 A. SHUSTER

2 Q. Do you agree that the sentence
3 says, "They can be helped to see that
4 talking indiscriminately to others about
5 child abuse may result in circulating
6 damaging and harmful talk"?

7 A. That's what it says.

8 Q. Do you know whether Proverbs
9 17:9 has to do with confidentiality?

10 A. I don't remember.

11 Q. Do you know where the rest of
12 the advice or instruction in the two
13 paragraphs comes from if there's no
14 citation to Bible verses?

15 A. I don't.

16 Q. Do you agree the heading on
17 page 1 says Watchtower Bible and Tract
18 Society of New York, Inc.?

19 A. In the header note, yes.

20 Q. Okay. You told me just a
21 moment ago or a couple moments ago that
22 when there's an accusation of child abuse
23 that elders call the authorities?

24 MS. KORFUL: Objection --

25 Q. Can you clarify that, please?

1 A. SHUSTER

2 MS. KORGUL: -- to the form.

3 You can answer.

4 A. If I learn of child abuse and
5 I'm in a state that requires me to report
6 that abuse, then I would report that abuse.

7 Q. What if you were in a state
8 that does not require it?

9 A. I don't know that I would have
10 a legal duty to do that.

11 Q. Do you know whether you would
12 report it?

13 A. I might, depending on the
14 circumstance.

15 Q. And when you say report, report
16 to whom?

17 A. Child Protection, to whatever
18 entity exists that I should report it to,
19 whatever the law requires.

20 Q. Would you ever call the police?

21 A. Yeah. I don't know.

22 Q. How would you find out whether
23 you were in a state where you were required
24 to report?

25 A. You can pretty well Google it

1 A. SHUSTER

2 and look it up on -- on the internet and
3 determine that for yourself.

4 Q. Can you point to any document
5 that asks you to Google whether to report
6 allegations of child abuse as an elder
7 within a Jehovah's Witness congregation?

8 A. No, I cannot.

9 Q. Are you aware of any policy
10 that began in the 1990s to -- for elders to
11 call the legal department when they hear of
12 allegations of child sex abuse within a
13 Jehovah's Witness congregation?

14 MS. KORFUL: Objection to the
15 form. You can answer.

16 A. As an elder in the
17 congregation, I can't recall exactly where
18 that would be if there's something there.

19 Q. If you're not in a state where
20 you're required to report to the police or
21 other authorities, would making such a
22 report be in conflict with maintaining
23 confidentiality of an accusation?

24 MS. KORFUL: Objection to the
25 form.

1 A. SHUSTER

2 recall that?

3 A. I do.

4 Q. Is your understanding of that
5 policy that it has changed over time at
6 all?

7 MS. KORFUL: Objection to the
8 form.

9 A. Yeah. I don't remember.

10 Q. So you're not aware today of
11 any different policy or rule or procedure
12 at any time regarding reporting child sex
13 abuse allegations to authorities?

14 A. I don't know.

15 Q. How did you learn or come to
16 understand how to handle these types of
17 allegations as an elder?

18 A. Well, some of it's practical
19 wisdom. Some of it's Bible principles that
20 we have, and we have publications that have
21 Bible principles stated, help explain them.

22 Q. Do you have any personal
23 understanding of what a policy is regarding
24 how Jehovah's Witnesses handle an
25 allegation?

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A. SHUSTER

MS. KORFUL: Objection to the form.
A. I don't know.

MR. MERRILL: Can I ask you to clarify your objection, please?

MS. KORFUL: Yeah. The -- yes. Using the word policy. You haven't established that they have any policies. In fact, they don't have policies. So the use of the word policy is an inappropriate objection in an inappropriate form. That's my objection.

It's a religious institution. It's not a business. It's not an employer that has policies like anti-harassment policy or workers' compensation policy. It's a religious organization; right?

Q. Mr. Shuster, is it correct that the religious organization of Jehovah's Witnesses does not have any policies?

A. I am not aware.

Q. You don't know --

1 A. SHUSTER

2 from Bible principles?

3 A. Not that I know of.

4 Q. Have you ever personally done
5 an investigation or been part of a
6 two-elder investigation regarding an
7 allegation of child sex abuse?

8 A. I don't remember.

9 Q. Have you ever been on a
10 judicial committee related to an allegation
11 of child sex abuse?

12 A. I don't remember.

13 Q. Have you ever called
14 authorities in relation to allegations of
15 child sex abuse in a congregation?

16 A. No.

17 Q. Have you ever instructed elders
18 on how to handle allegations of child sex
19 abuse while you were an instructor at
20 Kingdom Ministry School?

21 A. No.

22 Q. You became an instructor in the
23 1980s; correct?

24 A. Yes.

25 Q. Did you ever provide

1 A. SHUSTER

2 instruction to students at Kingdom Ministry
3 School regarding the two-witness rule?

4 MS. KORFUL: Objection to the
5 form.

6 A. It's a long time ago. I don't
7 remember.

8 Q. Did you ever provide any
9 instruction to students or elders at a
10 Kingdom Ministry School regarding the
11 biblical principle of having two witnesses
12 to substantiate an allegation?

13 MS. KORFUL: Form objection.

14 A. Yeah. Again, I do not
15 remember.

16 Q. Did you ever offer any
17 instruction in the 1980s regarding
18 confidentiality to elders at a Kingdom
19 Ministry School?

20 A. I don't remember.

21 MR. MERRILL: Let's have tab 1,
22 please.

23 MR. STEPANS: Is that 1?

24 (Whereupon, a Kingdom Ministry
25 School course document was marked as

1 A. SHUSTER

2 Q. Do you know how many people
3 work in the branch?

4 A. I do not.

5 Q. Would the people who work in
6 the branch be considered Bethelites?

7 A. In general, yes.

8 Q. Is there a distinction between
9 the branch and the Branch Committee?

10 A. The Branch Committee is some
11 specific individuals. The branch is in
12 general.

13 Q. Is the Branch Committee a
14 subset of the branch?

15 MS. KORFUL: Objection to the
16 form.

17 A. Yeah. I don't know.

18 Q. Are the individuals on the
19 Branch Committee part of the branch?

20 A. Yes.

21 Q. Do you know how many
22 individuals are on the Branch Committee?

23 A. I'd have to go through it and
24 count them. I -- I don't -- don't know
25 offhand.

1 A. SHUSTER

2 Q. Did those letters include
3 letters that were sent to congregations of
4 Jehovah's Witnesses in the United States?

5 A. Yes.

6 Q. Were those letters that we just
7 discussed in your answer to the previous
8 question sent on WTNY letterhead?

9 A. What year?

10 Q. 1985 to 2001 or please correct
11 me if there's a different set of years that
12 are correct.

13 A. Yeah. I think that's accurate,
14 yes.

15 Q. Were you authorized by WTNY to
16 use the letterhead for the letters we just
17 discussed in the prior question?

18 MS. KORFUL: Objection to the
19 form.

20 A. That I don't know.

21 Q. Did you previously know whether
22 or not you were authorized?

23 A. No.

24 Q. Does the service department
25 work with or through WTNY or WTPA -- excuse

1 A. SHUSTER

2 me. I'm going to strike that.

3 In the years prior to 2001, did
4 the service department work with either
5 WTNY or WTPA in carrying out its
6 operations?

7 MS. KORFUL: Objection to form.

8 A. I don't know.

9 Q. Do you know anything about what
10 types of records the service department
11 keeps?

12 A. We have congregations. We have
13 12,000 congregations in the United States,
14 and we have some indication as who serves
15 as elders and ministerial servants in those
16 congregations.

17 Q. Is the service department
18 provided with records of the ministry
19 activities by congregations in the United
20 States?

21 MS. KORFUL: Objection to the
22 form.

23 A. The question is a little vague.
24 Can you help me understand what you mean?

25 Q. Have you ever heard of an S-1

1 A. SHUSTER

2 desk or who has an office?

3 A. No.

4 Q. We've talked about different --
5 is entities a fair way to describe the
6 branch versus the service department or do
7 you have a word that describes those?

8 A. Service department is a
9 department within the United States Branch.

10 Q. Do -- does WTNY have separate
11 offices from the service department or the
12 branch?

13 MS. KORFUL: Objection to the
14 form.

15 A. I don't know.

16 Q. Same question about WTPA. Do
17 they have offices that are distinct from
18 the service department offices or the
19 branch?

20 A. I don't know.

21 Q. Does CCJW have offices that are
22 distinct from the service department or the
23 branch?

24 A. I don't know.

25 Q. You're the president of CCJW;

1 A. SHUSTER

2 than annually, they indicate whether our
3 financial standing is sound or not. The
4 specifics I -- I could not -- I could not
5 remember that.

6 Q. When you said they in your
7 previous answer, who were you referring to?

8 A. Well, we're talking about the
9 corporation -- Pennsylvania corporation.
10 So the board of directors of that
11 corporation, they would be they -- the
12 secretary, specifically.

13 Q. Are you aware of any
14 information regarding funds or investments
15 that are owned or controlled by WTPA?

16 MS. KORFUL: Objection to the
17 form. You can answer.

18 A. I'm -- I'm not aware.

19 Q. Have you ever been aware?

20 A. Ever been one what?

21 Q. Ever been aware of funds or
22 investments held by WTPA in your capacity
23 as a voting member.

24 A. I have not.

25 Q. Have you ever been aware of

1 A. SHUSTER

2 Jehovah's Witnesses in this country, and
3 that's -- that's property that's owned by
4 CCJW.

5 Q. Are those assembly halls where
6 the circuit assemblies that we discussed
7 earlier would occur?

8 A. That's correct.

9 Q. Would the conventions we
10 discussed earlier occur there as well?

11 A. Yes.

12 Q. I believe we've discussed that
13 there's a number of branches of Jehovah's
14 Witnesses -- one is the United States, and
15 there's others in other countries.

16 Generally speaking, based on
17 your personal knowledge, can you tell me
18 which branches benefit from CCJW or are
19 assisted by JC [sic] -- CCJW?

20 MS. KORGUL: Objection to the
21 form.

22 A. I'm not aware of any.

23 Q. How is CCJW used to build
24 Kingdom Halls, based on your personal
25 knowledge?