

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STELLA CRISTINA GOMES DE SOUZA,

Plaintiff,

Case No.: 7:25-cv-09458-NSR

-against-

WATCHTOWER BIBLE AND TRACT SOCIETY
OF PENNSYLVANIA, INC.; WATCHTOWER
BIBLE AND TRACT SOCIETY OF NEW YORK,
INC.; and THE GOVERNING BODY OF
JEHOVAH’S WITNESSES,

Defendants.

DECLARATION OF STELMA CRISTIANE GOMES DE SOUZA

I, Stelma Cristiane Gomes de Souza, being over eighteen (18) years of age, of sound mind, and competent to make this declaration, hereby declare under the penalty of perjury as follows:

1. I am the younger sister of Stella Cristina Gomes de Souza (“Stella”).
2. Stella was abused and raped when she was younger by, Angelo Roviezzo, an elder of the Jehovah’s Witnesses (the “Congregation”). When I was 12 years old, Stella told other elders in the Congregation about the abuse and rape, and such elders then approached me to say that I could not tell anyone anything; they warned that if I did, I would not be allowed to get baptized, and that Stella would be disfellowshipped – meaning Stella would have to go back to living with my mother, and we would never see her again. I was terrified at the time and chose to remain silent.
3. In 2017, Stella filed a rape complaint in Brazil against an elder (“Ângelo”) of the Congregation.
4. After Stella’s filing in 2017, my family and I received several threatening letters at my uncle’s house] in Brazil. These letters remained in the possession of my uncle Douglas, as he was assisting Stella with the complaint at the time. Unfortunately, as the years went by, Douglas destroyed all of the letters, claiming he did so to move on.
5. In 2021, Guilherme—along with another elder from the Guaianazes chapter of the Congregation whose name I cannot recall—came to my home in Brazil to try to speak with me.

They asked if I had told anyone about the incident and if I was committing any sins; at the time, their intention was to disfellowship me.

6. In 2022, Members of the Congregation came to my house in Brazil– to check on how I was doing or to look for Stella. I would invariably become distressed and as a result, I began to suffer from anxiety attacks. I never felt safe at home; I always had the impression that someone was watching me. Due to the latter, my husband (“Samuel”) suggested I disassociate from the Congregation and its Members, which I did.

7. In August 2025, two sisters from the Congregation came to my house in Brazil asking about my sister Stella and inquiring about the Ângelo case; they wanted to know if she intended to take any further action. I told them I knew nothing about it, and as they were leaving, they asked me to return to the meeting hall and handed me a Kingdom Hall contact card with the following address: *R. Santa Etelvina, 378, Cidade Tiradentes*. Samuel immediately asked them to leave and requested that no one else come to bother me at home again.

8. On November 3, 2025, Stella attempted to commit suicide in the UK, where she now lives and is a permanent resident.

9. On November 12, 2025, Stella filed the above-captioned lawsuit in the U.S. against the Congregation. Since then, me and my family have been subject to numerous threats against our safety and livelihood in an effort to convince Stella to drop the lawsuit.

10. On November 18, 2025, Stephany and I traveled to Stafford, United Kingdom with the intention of helping my sister Stella following her suicide attempt; she is going through a difficult time and is not doing very well psychologically. However, ever since we arrived, people have been saying that we fled here because something bad is about to happen. Every day, I find myself wondering: What exactly is this "bad thing" supposed to be? And I keep reminding myself that we certainly did not flee Brazil.

11. On December 10, 2025, my brother-in-law (“Gabriel”) – the husband of my older sister, Stephany Cristini (“Stephany”) – called her to let her know that when he arrived home in Brazil from work, he had found a letter addressed to her attached to the front gate, containing the following message. Not knowing how to handle this information, my brother-in-law preferred to leave this letter with Samuel for him to keep.

“Stay alert, we know where you are. Your sister is greedy and opportunistic. You are becoming like her, but Jehovah can still forgive you if you stop all this deception. Where are those witch girls who were always in the field and were excellent in the Kingdom Hall? All because of money? Dishonoring Jehovah’s name for money? Justice comes from Jehovah, not from men, remembering that in the waters your sister wants to swim in, it is full of sharks and also innocent fish. Choose life; the wages paid by sin is death.”

12. On January 2, 2026, Gabriel found another letter at the gate with the following content. Upon our recommendation, Gabriel gave the letter to Samuel.

“Matthew 18:15

Leviticus 19:17

Luke 17:3

Jehovah God has nothing to do with the sins of each member within His organization, because His laws and principles teach us that God is good and just. You are trying to blame Jehovah’s organization for something you yourselves did wrong, and now you are tarnishing Jehovah’s name? This is not right. Your sister ran away because she did not have the courage to face the consequences of her own lie. Satan is manipulating people like you to bring reproach on Jehovah’s name. But thanks to His mercy, there is still time for repentance, or He will destroy wicked people like you.

WHICH PATH WILL YOU CHOOSE?

(Jehovah is watching)

Romans 6:23”

13. On March 5, 2026, Gabriel received an additional letter with the following content, at his home. Upon our recommendation, Gabriel gave the letter to Samuel.

“Children are an inheritance from Jehovah. Do you think it is right to put his life at risk? This situation is only putting your lives in danger with powerful people you shouldn’t mess with. You are nothing and will never be anything. I hope my father’s name is not mentioned by your sister’s filthy mouth. If you have ever suffered in life, you will suffer much more now.”

14. On March 13, 2026, two women – who appeared to be members from the Congregation – showed up at Stella’s house in Stafford, asking for her. Stella was not home. Stephany and I didn't understand what they wanted, as we do not speak nor understand much English (I am fluent in Portuguese). Because of this incident, we decided to tell my sister what was going on, as we were frightened.

15. Right now, I am terrified that something might happen to my children or to me. I have a 7-month-old baby and a 3-year-old boy; I no longer have the courage – or even the desire - to leave the house, not even to do simple things. I live under constant pressure and in fear that something bad will happen every day; I am especially afraid of returning to Brazil and having something happen to my family there. Before I had my babies, I had to move about seven times because I never felt safe. I just want to live without fear; I just want to keep my family safe.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and I understand that this document may be filed in an action or proceeding in a court of law.

Executed on April 21, 2026, in the United Kingdom.

Assinado por:

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STELMA CRISTIANE GOMES DE SOUZA