

INTRODUCTION AND MATTER BEFORE THE COURT

1. Plaintiff CORINNE PANDELO (hereinafter “PLAINTIFF”) brings this action to seek redress for the sexual abuse she suffered at the hands of Clement Pandelo (“Pandelo”), an agent of Defendant THE GOVERNING BODY OF JEHOVAH’S WITNESSES (“GOVERNING BODY”), FAIRLAWN CONGREGATION OF JEHOVAH’S WITNESSES (“FAIRLAWN CONGREGATION”), WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK (“WATCHTOWER”), HACKENSACK CONGREGATION OF JEHOVAH’S WITNESSES (“HACKENSACK CONGREGATION”), and JOHN AND JANE DOE 1-100.

2. This complaint is filed pursuant to the New Jersey Child Sexual Abuse Act (CSAA), N.J.S.A. 2A:61B-1, et seq. New Jersey passed into law Bills S477 and A3648, which became effective December 1, 2019. This historic legislation opened a two-year, one-time filing window for survivors of childhood sexual abuse in the state of New Jersey to pursue otherwise time-barred actions based on sexual abuse. This law also amends the Charitable Immunity Act, N.J.S.A. 2A:53A-7, and the Tort Claims Act, N.J.S.A. 59-1-1 et seq., to allow for additional and retroactive liability for public entities and non-profit organizations organized for religious, charitable, educational, or hospital purposes.

PARTIES

3. Plaintiff CORINNE PANEDELO is a citizen and is domiciled in the state of New Jersey.

4. PLAINTIFF was born in 1976.

5. At all times relevant herein, PLAINTIFF and her family were members of the Jehovah’s Witness organization and attended Defendant FAIRLAWN CONGREGATION.

6. At all material times, Defendant WATCHTOWER is and was a New-York non-

profit corporation conducting business in the State of New Jersey, with its principal place of business at and which may be served at 100 Watchtower Drive, Patterson, New York, 12563.

7. Many of the acts and omissions alleged herein to have been committed by the various defendants occurred in the State of New Jersey.

8. At all material times, FAIRLAWN CONGREGATION was and is a congregation of the Jehovah's Witnesses located in Fairlawn, New Jersey.

9. Upon information and belief, during all of part of the time period relevant herein, FAIRLAWN CONGREGATION was known as "South Fairlawn Congregation of Jehovah's Witnesses."

10. At all material times, FAIRLAWN CONGREGATION is and was a business or religious entity of unknown legal status, which is authorized to conduct, and is conducting business in the State of New Jersey, with its principal place of business at and which may be served at 10 Nelson Ave, Hawthorne, NJ 07506.

11. During certain of the dates of the sexual abuse of PLAINTIFF, FAIRLAWN CONGREGATION supervised PLAINTIFF's molester, Clement Pandelo.

12. Pandelo was a ministerial servant in the Jehovah's Witness organization.

13. THE GOVERNING BODY was and is a religious body with a separate existence. On information and belief, the membership of Defendant GOVERNING BODY has changed over the years, but the entity that is the GOVERNING BODY has maintained a perpetual existence.

14. GOVERNING BODY is comprised of eight members. GOVERNING BODY does not claim to have a formal president or secretary.

15. GOVERNING BODY does have a coordinator that was formerly referred to as a chairman. On information and belief, the chairman of GOVERNING BODY is the functional

equivalent to a president or secretary in a secular unincorporated association.

16. The coordinator of GOVERNING BODY rotates on a yearly basis in alphabetical order.

17. The current members of the Governing Body are KENNETH E. COOK, JR.; SAMUEL FREDERICK HERD; GEOFFREY WILLIAM JACKSON; MARK STEPHEN LETT; GERRIT LOSCH; ANTHONY MORRIS III; D. MARK SANDERSON; and DAVID H. SPLANE. GOVERNING BODY does not publicly disclose its current coordinator. The following eight paragraphs are alleged in the alternative.

18. The current coordinator of GOVERNING BODY, as of October 1, 2019, is D. MARK SANDERSON.

19. The current coordinator of GOVERNING BODY, as of October 1, 2019, is DAVID H. SPLANE.

20. The current coordinator of GOVERNING BODY, as of October 1, 2019, is KENNETH E. COOK, JR.

21. The current coordinator of GOVERNING BODY, as of October 1, 2019, is SAMUEL FRERICK HERD.

22. The current coordinator of GOVERNING BODY, as of October 1, 2019, is GEOFFREY WILLIAM JACKSON.

23. The current coordinator of GOVERNING BODY, as of October 1, 2019, is MARK STEPHEN LETT.

24. The current coordinator of GOVERNING BODY, as of October 1, 2019, is GERRIT LOSCH.

25. The current coordinator of GOVERNING BODY, as of October 1, 2019, is

ANTHONY MORRIS, III.

26. At the time of the acts giving rise to the causes of action alleged in this complaint, GOVERNING BODY's principal office and place of business was in the County of Kings, State of New York.

27. In or about April of 2001, Christian Congregation of Jehovah's Witnesses, Inc. ("CCJW") assumed from WATCHTOWER the obligation to operate the Service Department of the United States Branch of Jehovah's Witnesses.

28. At the time of the acts giving rise to the causes of action alleged in this complaint, HACKENSACK CONGREGATION was and is a congregation of the Jehovah's Witnesses located in Hackensack, New Jersey.

29. At all material times, HACKENSACK CONGREGATION is and was a business or religious entity of unknown legal status, which is authorized to conduct, and is conducting business in the State of New Jersey, with its principal place of business at and which may be served at 506 Hamilton Place, Hackensack, New Jersey, 07601.

30. During certain of the dates of the sexual abuse of PLAINTIFF, HACKENSACK CONGREGATION supervised PLAINTIFF's molester, Clement Pandelo.

31. JOHN AND JANE DOE 1-30, whose names are presently unknown, were members of and officials of defendant FAIRLAWN CONGREGATION.

32. JOHN AND JANE DOE 31-60, whose names are presently unknown, were former members and officials of defendant WATCHTOWER.

33. JOHN AND JANE DOES 61-100, whose names are presently unknown, were former members and officials of defendant the GOVERNING BODY.

34. JOHN AND JANE DOES 81-100, whose names are presently unknown, were

former members and officials of defendant HACKENSACK CONGREGATION.

FACTUAL BACKGROUND

35. Pandelo attended HACKENSACK CONGREGATION during the relevant time period. Pandelo began also attending FAIRLAWN CONGREGATION during the relevant time period because HACKENSACK CONGREGATION was undergoing construction. As a result of the construction, members of FAIRLAWN CONGREGATION were moved to HACKENSACK CONGREGATION for a period of about two years.

36. At the time of his first disfellowship in or around 1988, Pandelo was a ministerial servant in the FAIRLAWN CONGREGATION.

37. During the relevant time period, Pandelo was also a ministerial servant in the HACKENSACK CONGREGATION.

38. In or around 1976-1977, when PLAINTIFF was still wearing diapers, Pandelo began to sexually abuse her. Over time, the sexual abuse grew to consist of Pandelo's touching PLAINTIFF's genitals and undeveloped breasts underneath her clothing, inserting his fingers into her vagina, forcing her to perform oral sex on him, and forcing her to engage in vaginal and anal intercourse with him. Pandelo also forced his dog to lick PLAINTIFF's vaginal area.

39. Pandelo's sexual abuse of PLAINTIFF lasted until in or around August 1988, when she disclosed the abuse to her parents.

40. PLAINTIFF's father, Carl Pandelo, reported the sexual abuse of PLAINTIFF to the Elders in his neighborhood, some of whom were Elders in a congregation in which Pandelo was a ministerial servant.

41. The Elders convened a judicial committee to investigate the allegations of Pandelo's sexual abuse of PLAINTIFF.

42. In or around 1988, Elders disfellowshipped Pandelo based on the allegations of sexual abuse of Pandelo.

43. Carl Pandelo also reported Pandelo's sexual abuse of PLAINTIFF to law enforcement.

44. In or around 1989, Pandelo was arrested and pleaded guilty to endangering the welfare of a child and criminal sexual conduct based on his admitted sexual abuse of PLAINTIFF as well as at least one other female child.

45. As part of his guilty plea, Pandelo admitted under oath that he had sexually abused minors for forty years.

46. After his conviction for child sexual abuse of multiple children for forty years, Pandelo was reinstated to the Jehovah's Witnesses.

47. After he was reinstated, Pandelo was later disfellowshipped again when additional details were revealed about the extent of his sexual abuse of PLAINTIFF as well as revelations that Pandelo had sexually abused two other minor females.

48. Following Pandelo's second disfellowship, he was later reinstated to the Jehovah's Witnesses despite having admitted to sexually abusing multiple children.

49. Approximately ten years prior to beginning to abuse PLAINTIFF, in or around 1967, Pandelo admitted to sexual misconduct involving minor girls and/or an adulterous affair with a teenaged girl. This misconduct was reported to Elders of the Congregation that Pandelo attended at the time, and Pandelo was publicly reproofed as a result. No other action was taken with regard to the reports of sexual misconduct of Pandelo, including that no reports to law enforcement were made.

50. During the time in which Pandelo was sexually abusing PLAINTIFF, but before

Carl Pandelo had learned that his father was abusing PLAINTIFF, in or around 1985 or 1986, Carl Pandelo learned that Pandelo was sexually abusing children. He reported these allegations to an Elder—one of the same Elders to whom he later reported Pandelo’s sexual abuse of PLAINTIFF. This Elder directed Carl Pandelo to report these allegations of abuse to another Elder, which Carl did.

51. When Carl Pandelo followed up with the Elders several weeks later to find out what action they had taken with regard to Pandelo’s sexual abuse of minors, he was told that no action was taken to discipline, reproof, or disfellowship Pandelo. Pandelo’s conduct was not reported to law enforcement.

52. During the time in which Pandelo was sexually abusing PLAINTIFF, Pandelo’s neighbor, a minor child, also reported to her mother that Pandelo had been repeatedly fondling her breasts and genitals. This conduct was reported to law enforcement. Pandelo admitted to this conduct.

53. Elders of the congregation that Pandelo attended at the time were informed of this conduct, but Pandelo was not disfellowshipped even though he had admitted to sexually abusing a child.

54. In or around January 1994, PLAINTIFF filed suit in the Superior Court of New Jersey, Law Division: Bergen County through her guardian ad litem, Carl Pandelo, against Pandelo and his wife, Olga Pandelo.

55. PLAINTIFF’s 1994 lawsuit sought damages against Pandelo and his wife to compensate her for the physical and emotional injuries she sustained as a result of Pandelo’s sexual abuse of her.

56. None of the DEFENDANTS named in this action were a party to the 1994 action.

57. On December 23, 1999, after a trial before a jury, judgment was entered in favor of PLAINTIFF and against Pandelo and his wife in the amount of \$2,278,874.90.

JURISDICTION AND VENUE

58. This action is timely commenced pursuant to the New Jersey Child Victims Act, dated December 1, 2019.

59. This Court has jurisdiction pursuant to Rule 4:3-2 as the FAIRLAWN CONGREGATION and HACKENSACK CONGREGATION conducted business in the State of New Jersey at all times relevant herein, and a substantial portion of the events or omissions giving rise to the claims occurred in the County of Bergen, State of New Jersey.

60. Venue is proper pursuant to Rule 4:3-2 because a substantial part of the events or omissions giving rise to the claims occurred within Bergen County.

CAUSES OF ACTION AGAINST DEFENDANTS

**COUNT I –
NEGLIGENCE AND/OR GROSS NEGLIGENCE**

61. PLAINTIFF repeats, reiterates, and re-alleges each and every allegation contained in the previous paragraphs as if set forth herein.

62. Defendants are responsible by their knowledge, action, and/or inaction, as if all allegations set forth in this Complaint pertain to all Defendants, and they are jointly and severally liable.

63. Each Defendant owed PLAINTIFF a duty of reasonable care to protect PLAINTIFF from injury.

64. Each Defendant owed PLAINTIFF a duty of care because each Defendant had a special relationship with Plaintiff.

65. Each Defendant owed PLAINTIFF a duty to protect PLAINTIFF from harm

because each Defendant also had a special relationship with Pandelo.

66. Defendants owed PLAINTIFF a duty of reasonable care because they held their agents, including Pandelo, out as safe to work with children; and/or encouraged their agents, including Pandelo, to spend time with, interact with, and recruit children.

67. Further, Defendants, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted this position of power. Defendants thus entered into a fiduciary relationship with PLAINTIFF and her family. Defendants exploited their position of power, putting Plaintiff at risk to be sexually assaulted.

68. Defendants, by holding themselves out as being able to provide a safe environment for children, solicited and/or accepted a position of power over PLAINTIFF.

69. Defendants, through their employees and/or agents, including Pandelo, exploited their position of power over PLAINTIFF and thereby put the minor PLAINTIFF at risk for sexual abuse.

70. Defendants entered into an express and/or implied duty to properly supervise PLAINTIFF and provide a reasonably safe environment for children who attended their services and activities by accepting the minor PLAINTIFF as a participant in their services and activities and as a minor at their facilities; and holding their facilities, services, and activities out to be safe environments for PLAINTIFF. Defendants owed PLAINTIFF a duty to properly supervise PLAINTIFF to prevent harm from foreseeable dangers. Defendants had the duty to exercise the same degree of care over minors under their control as a reasonably prudent person would have exercised under similar circumstances.

71. Each Defendant owed PLAINTIFF a duty to protect PLAINTIFF from harm, because Defendants invited PLAINTIFF onto their property and facility, and Pandelo posed a

dangerous condition on Defendant's property.

72. Defendants breached their duties to PLAINTIFF by failing to use reasonable care. Defendants' failures include, but are not limited to, failing to properly supervise their volunteers employees, and/or agents, including Pandelo, failing to properly supervise PLAINTIFF, and failing to protect Plaintiff from foreseeable dangers.

73. As a direct and proximate result of Defendants breaching their duties, PLAINTIFF sustained physical, emotional, and psychological injuries, along with pain and suffering. The sexual abuse and resulting injuries to PLAINTIFF were caused solely and wholly by reason of the negligent and/or grossly negligent failures, actions, and inactions of Defendants.

COUNT II –
NEGLIGENT AND/OR GROSSLY NEGLIGENT SUPERVISION
Plaintiff v. All Defendants

74. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in the previous paragraphs as if set forth herein.

75. Pandelo was assigned and authorized to serve as a ministerial servant by the joint efforts of WATCHTOWER and GOVERNING BODY.

76. Pandelo's duties as a ministerial servant included the supervision of children, and were authorized by WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100.

77. Pandelo was, by virtue of his appointment as a ministerial servant, an agent of WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100.

78. Pandelo was acting within the scope of his employment or agency in performing duties for, and on behalf of WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100.

79. In connection with his responsibilities as a ministerial servant at FAIRLAWN CONGREGATION, Pandelo had regular and frequent contact with children who attended the congregation.

80. In connection with his responsibilities as a ministerial servant at HACKENSACK CONGREGATION, Pandelo had regular and frequent contact with children who attended the congregation.

81. WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 knew or should have known that Pandelo would have regular and frequent contact with children in connection with his position as a ministerial servant within FAIRLAWN CONGREGATION.

82. WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 knew or should have known that Pandelo would have regular and frequent contact with children in connection with his position as a ministerial servant within HACKENSACK CONGREGATION.

83. WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 knew or should have known that Pandelo sexually abused children, including PLAINTIFF.

84. WATCHTOWER, FAIRLAWN CONGREGATION, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 concealed from PLAINTIFF and her parents their knowledge of Pandelo's sexually abusive behavior.

85. Each defendant is the agent, servant, and/or employee of the other defendants, had the right to control the specific actions contributing to the abuse of PLAINTIFF by Pandelo, and each defendant was acting within the course and scope of his or its authority as an agent, servant

and/or employee of the other.

86. The organizational structure of the Jehovah's Witnesses is hierarchical.

87. The organizational head of the Jehovah's Witnesses was and is GOVERNING BODY, and GOVERNING BODY retains the right to control the daily activities of all of the individuals and entities within the Jehovah's Witnesses organization as those activities pertain to church functioning or governance, irrespective of whether the GOVERNING BODY exercises that right to control in any particular instance.

88. GOVERNING BODY is composed of a fluctuating number of elders. The GOVERNING BODY is organized into six committees that oversee all aspects of the Jehovah's Witness Organization within the United States. Corporations such as Defendant Watchtower Bible and Tract Society of New York, Inc. have been formed and are used by the Governing Body to facilitate the preaching and care for the spiritual needs of the congregations and to hold title to properties in New York.

89. Authority flows downward from GOVERNING BODY to the local level of the Jehovah's Witness organization, which is made up of congregations. The GOVERNING BODY appoints three or more Elders to serve on the Branch Committees at each of 116 branch offices of the Jehovah's Witnesses world-wide, including the United States Branch, all subject to the GOVERNING BODY's ongoing direction and right to control. The Service Department of the United States Branch oversees the activities of the congregations under the oversight of the U.S. Branch Committee and reports to the Service Committee of the Governing Body.

90. Congregations are organized by circuit.

91. A circuit consists of some number of congregations.

92. Each circuit is staffed by a circuit overseer and/or a substitute circuit overseer

approved and appointed by the GOVERNING BODY, and subject to its direction and control.

93. It is the responsibility of the circuit overseer to ensure that directives and policies promulgated by GOVERNING BODY and WATCHTOWER are being followed and correctly implemented at the congregation, circuit and district levels, including at congregations, circuits, and district levels in New Jersey.

94. The circuit overseer personally visits each congregation within his circuit twice yearly.

95. The circuit overseer personally meets with the elders of the congregations within his circuit.

96. During the circuit overseer's visits, the elders of the congregation and the circuit overseer discuss the overall functioning of the congregation, as well as specific instances of alleged wrongdoing, including allegations of child molestation.

97. The circuit overseer participates in field service and observes and reports upon the functioning of the congregation.

98. During the circuit overseer's visits, the elders of the congregation and the circuit overseer meet to discuss the men in the congregation, with the purpose of identifying men who meet the requirements for appointment as ministerial servants or elders.

99. The circuit overseer assists the elders in arriving at recommendations to defendant WATCHTOWER for appointment as ministerial servants and elders in the congregation.

100. Prior to April of 2001, circuit overseers prepared reports regarding their visits to the congregations and submitted the report to WATCHTOWER as the agent of GOVERNING BODY.

101. Since April of 2001, circuit overseers have submitted their reports to CCJW as the

agent of GOVERNING BODY.

102. Day to day operations of each congregation, including congregations in New Jersey, are run by a body of elders, subject to the right to control by WATCHTOWER and GOVERNING BODY.

103. Women are not permitted to serve as elders.

104. The elders are the highest authority at the congregational level.

105. The responsibilities of the elders include directing door-to-door preaching activities, selecting potential candidates for the position of ministerial servants or elders, organizing weekly church meetings, selecting candidates for the position of publisher, handling finances for the congregation, mentoring congregation members including children of the congregation, and determining the guilt, repentance, and punishment of church members who commit wrongdoing, subject to the right to control by WATCHTOWER and GOVERNING BODY.

106. In order to be appointed as an elder, a person must be a ministerial servant in good standing or have served as an elder in another congregation.

107. When the local elders identify a candidate for the position of elder, the circuit overseer recommends the candidate to WATCHTOWER.

108. WATCHTOWER and GOVERNING BODY have ultimate authority over the appointment of any candidate to the position of elder, including elders in New Jersey.

109. In the spring of 2001, CCJW took over WATCHTOWER'S responsibilities for the appointment of elders.

110. CCJW also assumed the responsibility from WATCHTOWER of nominating, appointing, supervising and disciplining publishers, ministerial servants, pioneers, elders, and

circuit overseers.

111. Baptized publishers who meet certain requirements may be appointed as ministerial servants.

112. Ministerial servants serve the congregation and aid the elders in their responsibilities and take on leadership responsibilities in the absence of an elder, subject to the right to control by WATCHTOWER and GOVERNING BODY.

113. In order to be appointed as a ministerial servant, a person must be a publisher in good standing.

114. Only males may serve as ministerial servants.

115. The body of elders of the local congregation identifies potential candidates for the position of ministerial servant.

116. The body of elders in concert with the circuit overseer, determines whether a potential candidate for ministerial servant is suitable, and lives his life in accordance with appropriate morals, subject to the right to control by WATCHTOWER and GOVERNING BODY.

117. Recommendations for the appointment of any individual to the position of ministerial servant are made to the WATCHTOWER.

118. WATCHTOWER and GOVERNING BODY have the ultimate authority as to whether a candidate is elevated to the level of ministerial servant.

119. Membership in the Jehovah's Witness organization is strictly regulated and monitored by WATCHTOWER and GOVERNING BODY, and subject to their direction and control.

120. A person can attend open meetings at the Kingdom Hall for years, and not be a member of the congregation.

121. An individual who wishes to become a member of the Jehovah's Witnesses, begins the process by engaging in a period of bible study with a baptized member of the congregation, along with self-study.

122. After months of study, a person may become an unbaptized publisher.

123. In order to become an unbaptized publisher, the aspirant must apply to the congregation's body of elders.

124. The body of elders determine whether the aspirant exhibits enough knowledge of the beliefs and organization of the Jehovah's Witnesses to become a baptized publisher, subject to the right to control by WATCHTOWER and GOVERNING BODY.

125. The body of elders determine whether the morals and ethics of the aspirant meet the Jehovah's Witnesses standards.

126. Once a person is approved as an unbaptized publisher, he or she is authorized to represent the Jehovah's Witnesses, and the specific congregation, in the community.

127. An unbaptized publisher is authorized to engage in field service, which is the centerpiece of Jehovah's Witness marketing, fundraising, and recruiting activities.

128. Field service involves door-to-door proselytizing subject to the right to control by WATCHTOWER and GOVERNING BODY.

129. WATCHTOWER and GOVERNING BODY controlled and directed field service, including recruitment of new Jehovah's Witness members, across the country, including in New Jersey.

130. By participating in field service, an unbaptized publisher is authorized by the congregation and by the Jehovah's Witness organization to distribute Jehovah's Witness literature to members of the community, to accept donations on behalf of the organization, and to invite

prospective members of the community to attend open congregation meetings at the Kingdom Hall as a means of recruitment.

131. Prior to April of 2001, each publisher was instructed by the congregation, as directed by defendant WATCHTOWER, on how to become more effective at disseminating literature, receiving donations, and enticing non-members to attend public congregation meetings or begin bible study.

132. Since April of 2001, CCJW has assumed WATCHTOWER'S responsibilities for improving publisher's presentations.

133. Publishers must submit monthly records to the congregation detailing their hours spent in field service.

134. Publishers must submit forms to the congregation secretary for each "bible study" conducted by a publisher during the month.

135. Failure to submit field service records can lead to a publisher being designated as "irregular" or "inactive", which results in lowered status within the congregation.

136. After additional study, an unbaptized publisher may seek to become a baptized publisher.

137. Baptism as one of Jehovah's Witnesses is considered an ordination as minister of the Jehovah's Witnesses.

138. To be approved for baptism, an applicant must be tested and approved by elders of the local congregation.

139. During the testing, the applicant is asked certain questions relating to the teachings of the Jehovah's Witnesses as well as the organizational structure of the Jehovah's Witnesses.

140. Baptized publishers may make a greater commitment by pledging to spend a

specified number of hours in service for a period of time.

141. Pioneers are baptized publishers who have pledged to perform a specified number of hours of field service.

142. An auxiliary pioneer is a baptized publisher who applies to the congregation's elders to perform a certain number of hours of field service during a one-month period of time.

143. The elders have discretion to accept or reject an application for auxiliary pioneer.

144. A regular pioneer is a baptized publisher who pledges to spend a specified number of hours in field service each month for one year.

145. In order to become a regular pioneer, an applicant gains the recommendation of the congregation's elders, who in turn submit that recommendation for approval to WATCHTOWER.

146. WATCHTOWER has the discretion to approve or reject an application for regular pioneer, as an extension of and subject to the right to control by GOVERNING BODY.

147. Since April of 2001, CCJW has assumed responsibility for approving or rejecting applications for regular pioneers.

148. Publishers submit to the domination, direction, and control of the Jehovah's Witness organization, as expressed through the directives of WATCHTOWER and GOVERNING BODY.

149. WATCHTOWER and GOVERNING BODY, through their agents, monitors each publisher's field service and bible study records, standardizes methods to be used during proselytizing activities, provides the only approved literature to be distributed during field service, directs where publishers will perform field service, controls access to sought after positions as regular or auxiliary pioneers, and determines appointments as ministerial servants, elders, and overseers.

150. The Jehovah's Witness organization dictates and implements the Jehovah's Witness practice of shunning, which involves isolating and not interacting with members that have been disfellowshipped or have voluntarily left the church.

151. A publisher's personal grooming, appearance and dress are regulated by his or her congregation, subject to the right to control by WATCHTOWER and GOVERNING BODY.

152. A publisher's use of alcohol, tobacco, or drugs is regulated by his or her congregation, subject to the right to control by WATCHTOWER and GOVERNING BODY.

153. A publisher's illegal sexual conduct, such as child sexual abuse occurring away from Jehovah's Witness locations and events are subject to regulation and the imposition of punishment by the congregation, subject to the right to control by WATCHTOWER and GOVERNING BODY.

154. A publisher's legal sexual conduct is subject to regulation and the imposition of punishment by the congregation, subject to the right to control by WATCHTOWER and GOVERNING BODY.

155. Congregants are encouraged to bring problems to the elders to be resolved, and are discouraged from seeking intervention from outside of the Jehovah's Witness organization, subject to the right to control by WATCHTOWER and GOVERNING BODY.

156. When a congregant commits an act of wrongdoing, such as the sexual abuse of a child, that matter must be brought to an elder to be resolved.

157. The policy promulgated by WATCHTOWER and GOVERNING BODY requires elders to investigate allegations of sexual abuse of a child.

158. The policy promulgated by WATCHTOWER and GOVERNING BODY requires two witnesses to any alleged sexual abuse of a child before a judicial committee will be convened.

159. The policy promulgated by WATCHTOWER and GOVERNING BODY provides that if there are not two witnesses to any alleged sexual abuse of a child, and the accused denies any wrongdoing, the accused is determined to be innocent and no corrective, protective or punitive action is taken by the congregation.

160. If a judicial committee is convened to investigate an allegation of sexual abuse of a child, the two original elders who investigated the wrongdoing will be joined by a third elder, who will hear the case and impose punishment upon the wrongdoer, subject to the right to control by WATCHTOWER and GOVERNING BODY.

161. Potential punishments for sexual abuse of a child include private reproof, public reproof, and disfellowship, subject to the right to control by WATCHTOWER and GOVERNING BODY.

162. Private reproof in the Jehovah's Witness organization means a private censorship of the wrongdoer that generally results in a limitation of one or more privileges within the congregation for a short time. This does not mean that a reproved person is necessarily precluded from engaging in field service.

163. The policy promulgated by WATCHTOWER and GOVERNING BODY provides that the congregation is not informed when an individual is subject to private reproof.

164. In the Jehovah's Witness organization, public reproof means an announcement is made to the congregation that the individual has been reproved by a judicial committee and found to be repentant.

165. Disfellowship is expulsion from the Jehovah's Witness organization.

166. When an individual is disfellowshipped, an announcement is made to the congregation that he or she is no longer one of Jehovah's Witnesses.

167. The policy promulgated by WATCHTOWER and GOVERNING BODY provides that when an individual is disfellowshipped, the congregation is not informed of any acts of wrongdoing, or of the basis for the person's expulsion from the Jehovah's Witness organization.

168. The policy promulgated by WATCHTOWER and GOVERNING BODY provides that a person who is disfellowshipped may seek reinstatement into the Congregation by written request to the elders.

169. At all times prior to April of 2001, WATCHTOWER operated the Service Department of the United States branch of Jehovah's Witnesses.

170. Through the Service Department, WATCHTOWER implemented the policies and procedures promulgated by GOVERNING BODY, as an extension of and subject to the right to control by GOVERNING BODY.

171. WATCHTOWER exercised control over the day-to-day operations and activities of local congregations, as an extension of and subject to the right to control by GOVERNING BODY.

172. Prior to April of 2001, WATCHTOWER published a series of handbooks that were distributed to elders, as an extension of and subject to the right to control by GOVERNING BODY.

173. The aforesaid handbooks were not disclosed to other Jehovah's Witnesses or the public.

174. The aforesaid handbooks produced by WATCHTOWER and GOVERNING BODY provided general instructions to elders regarding day-to-day administration of the organization.

175. The aforesaid handbooks produced by WATCHTOWER and GOVERNING BODY provided instructions to elders regarding how to respond to allegations of wrongdoing,

including child molestation.

176. The aforesaid handbooks produced by WATCHTOWER and GOVERNING BODY specified the actions elders were required to take upon learning of child molestation within their congregations.

177. Prior to April of 2001, WATCHTOWER provided periodic instruction to local congregations through letters addressed to All Bodies of Elders, as an extension of and subject to the right to control by GOVERNING BODY.

178. These letters covered a broad spectrum of topics ranging from standardizing the record-keeping practices of all congregations, establishing procedures for ordering literature from defendant WATCHTOWER, remitting payments, handling administrative and procedural matters involving day-to-day congregation operations.

179. Some of the aforesaid letters provided specific instructions on how to respond to wrongdoing within the congregation, including child molestation.

180. CCJW assumed responsibility for disseminating some of these letters on and after April of 2001, as an extension of and subject to the right to control by GOVERNING BODY.

181. WATCHTOWER, through its Writing Department, and prior to April of 2001, through the Service Department, researches, writes, approves, publishes, and distributes its own materials for distribution to actual and prospective Jehovah's Witnesses, as an extension of and subject to the right to control by GOVERNING BODY.

182. WATCHTOWER appointed circuit and district overseers, as an extension of and subject to the right to control by GOVERNING BODY.

183. WATCHTOWER directly reviewed recommendations of prospective elders, as an extension of and subject to the right to control by GOVERNING BODY.

184. WATCHTOWER directly reviewed recommendations of ministerial servants, as an extension of and subject to the right to control by GOVERNING BODY.

185. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of elder, and maintained the right to control the daily activities of any specific individual so appointed, whether or not that control was exercised.

186. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of ministerial servant, and maintained the right to control the daily activities of any specific individual so appointed, whether or not that control was exercised.

187. GOVERNING BODY was and is authorized to approve or reject the appointment of any person recommended for the position of district or circuit overseer, and maintained the right to control the daily activities of any specific individual so appointed, whether or not that control was exercised.

188. WATCHTOWER established procedures for the discipline of members accused of wrongdoing, as an extension of and subject to the right to control by GOVERNING BODY.

189. WATCHTOWER received and maintained records regarding the disfellowship or reproof of elders and ministerial servants, as an extension of and subject to the right to control by GOVERNING BODY.

190. In March of 1997, WATCHTOWER disseminated a letter to all of the Bodies of Elders in United States congregations seeking information on men who then served, or had previously served, in any appointed position (e.g., elder, ministerial servant, regular pioneer) and were also known to have engaged in child molestation, as an extension of and subject to the right to control by GOVERNING BODY.

191. WATCHTOWER required each congregation to prepare reports detailing instances of child molestation, and to return the reports to WATCHTOWER's Service Department, as an extension of and subject to the right to control by GOVERNING BODY.

192. In July of 1998, defendant WATCHTOWER sent a follow up letter to each United States congregation, reminding those bodies of elders of the need to send the reports, and possible legal consequences of appointing a known child molester to a position of authority, such as an elder or ministerial servant, as an extension of and subject to the right to control by GOVERNING BODY.

193. Reports regarding the sexual abuse of children were received by the Service Department and kept by defendants WATCHTOWER and GOVERNING BODY.

194. Prior to receiving the written reports, WATCHTOWER and GOVERNING BODY were aware that child molestation by elders, ministerial servants, and publishers was a problem within its congregations.

195. Despite receiving the written reports, WATCHTOWER and GOVERNING BODY did not promulgate new or effective policies for preventing or responding to child molestation.

196. Despite receiving the written reports, WATCHTOWER and GOVERNING BODY did not implement procedures or policies to educate children and adult members of the risk of child molestation within the Jehovah's Witness organization, how to identify warning signs of molestation, or how to avoid dangerous situations.

197. CCJW assumed operation of the Service Department, and gained possession and knowledge of the molestation reports, and also received new reports of molestation by Jehovah's Witnesses, as an extension of and subject to the right to control by GOVERNING BODY.

198. Reports of sexual molestation continue to be sent to CCJW, as an extension of and

subject to the right to control by GOVERNING BODY.

199. At the direction of GOVERNING BODY, a policy letter from July 1989 required elders to contact defendant WATCHTOWER's Legal Department about child abuse, instead of contacting the police.

200. WATCHTOWER and GOVERNING BODY left that policy intact even after receiving written reports of molestation from their individual agents and congregants.

201. WATCHTOWER's Service Department has never made a mandated child abuse report to law enforcement.

202. The policies on child molestation promulgated by WATCHTOWER and GOVERNING BODY through the elder handbooks and confidential policy letters were not divulged to Jehovah's Witness members.

203. Through this mandated secrecy regarding child molestation by elders, ministerial servants, and publishers, WATCHTOWER and GOVERNING BODY intentionally concealed the threat of child molestation within the Jehovah's Witnesses from their members.

204. Through policies of non-reporting to law enforcement and non-cooperation with criminal child molestation investigations, defendants WATCHTOWER and GOVERNING BODY protected accused and admitted child molesters from criminal prosecution and thereby increased the risk of molestation of minors.

205. PLAINTIFF was trained by the FAIRLAWN CONGREGATION, WATCHTOWER, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 that she should obey Pandelo and respect the individuals appointed as elders and ministerial servants, including Pandelo.

206. Pandelo was a ministerial servant in the FAIRLAWN CONGREGATION with

substantial authority over PLAINTIFF and other congregants.

207. Pandelo was a ministerial servant in the HACKENSACK CONGREGATION with substantial authority over PLAINTIFF and other congregants.

208. Despite receiving a report regarding Pandelo's abuse of multiple children and knowing his propensity to sexually abuse minors, the FAIRLAWN CONGREGATION, WATCHTOWER, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 provided no warning to members of the FAIRLAWN CONGREGATION whose children were at risk, including PLAINTIFF.

209. Despite receiving a report regarding Pandelo's abuse of multiple children and knowing his propensity to sexually abuse minors, the FAIRLAWN CONGREGATION, WATCHTOWER, GOVERNING BODY, HACKENSACK CONGREGATION, and DOES 1-100 provided no warning to members of the HACKENSACK CONGREGATION whose children were at risk, including PLAINTIFF.

210. WATCHTOWER had a duty to protect PLAINTIFF, as a minor congregant, from Pandelo's sexual criminal acts.

211. WATCHTOWER had a duty to competently investigate Pandelo prior to accepting him as its agent.

212. WATCHTOWER had a duty to competently supervise Pandelo during the time he served as its agent.

213. WATCHTOWER had a special duty to supervise Pandelo.

214. WATCHTOWER had a special duty to protect PLAINTIFF.

215. WATCHTOWER failed to adequately and competently supervise Pandelo.

216. FAIRLAWN CONGREGATION had a duty to protect PLAINTIFF, as a minor

congregant, from Pandelo's sexual criminal acts.

217. FAIRLAWN CONGREGATION had a duty to competently investigate Pandelo prior to accepting him as its agent.

218. FAIRLAWN CONGREGATION had a duty to competently supervise Pandelo during the time he served as a ministerial servant.

219. FAIRLAWN CONGREGATION had a special duty to supervise Pandelo.

220. FAIRLAWN CONGREGATION had a special duty to protect PLAINTIFF.

221. FAIRLAWN CONGREGATION failed to adequately and competently supervise Pandelo.

222. GOVERNING BODY had a duty to protect PLAINTIFF, as a minor congregant, from Pandelo's sexual criminal acts.

223. GOVERNING BODY had a duty to competently investigate Pandelo prior to accepting him as its agent.

224. GOVERNING BODY had a duty to competently supervise Pandelo during the time he served as a ministerial servant.

225. GOVERNING BODY had a special duty to supervise Pandelo.

226. GOVERNING BODY had a special duty to protect PLAINTIFF.

227. GOVERNING BODY failed to adequately and competently supervise Pandelo.

228. HACKENSACK CONGREGATION had a duty to protect PLAINTIFF, as a minor congregant, from Pandelo's sexual criminal acts.

229. HACKENSACK CONGREGATION had a duty to competently investigate Pandelo prior to accepting him as its agent.

230. HACKENSACK CONGREGATION had a duty to competently supervise Pandelo

during the time he served as a ministerial servant.

231. HACKENSACK CONGREGATION had a special duty to supervise Pandelo.

232. HACKENSACK CONGREGATION had a special duty to protect PLAINTIFF.

233. HACKENSACK CONGREGATION failed to adequately and competently supervise Pandelo.

234. DOES 1-100 had a duty to protect PLAINTIFF, as a minor congregant, from Pandelo's sexual criminal acts.

235. DOES 1-100 had a duty to competently investigate Pandelo prior to accepting him as their agent.

236. DOES 1-100 had a duty to competently supervise Pandelo during the time he served as a ministerial servant.

237. DOES 1-100 had a special duty to supervise Pandelo.

238. DOES 1-100 had a special duty to protect PLAINTIFF.

239. DOES 1-100 failed to adequately and competently supervise Pandelo.

240. Pandelo's sexual abuse of PLAINTIFF was proximately caused by the failure of WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION, and DOES 1-100 to adequately and competently supervise Pandelo.

241. The aforementioned occurrences of sexual abuse were caused by the negligence, carelessness, and recklessness and the willful, wanton, reckless and grossly negligent conduct of WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION, and DOES 1-100, and their agents, servants, and/or employees, in failing to properly and adequately supervise the conduct of Pandelo as it related to PLAINTIFF.

242. By reason of the foregoing, PLAINTIFF suffered sustained physical and

psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

243. As a result of the Defendants' conduct, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

244. By reason of the foregoing, WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 are also liable to PLAINTIFF for punitive and exemplary damages.

COUNT III –
NEGLIGENT AND/OR GROSSLY NEGLIGENT RETENTION
Plaintiff v. All Defendants

245. PLAINTIFF repeats, reiterates, and realleges each and every allegation of this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

246. Prior to and all times herein mentioned, WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 knew of Pandelo's conduct toward PLAINTIFF and/or his propensity to sexually abuse minors such as PLAINTIFF, and yet they maintained his employment as their agent.

247. It was reasonably foreseeable that when the elders learned that Pandelo had been accused of molesting more than one minor prior to the conclusion of his molestation of PLAINTIFF, that his continued association with the FAIRLAWN CONGREGATION, absent any warning to PLAINTIFF or her parents or other members of these congregations, would mean that there was a heightened risk that Pandelo would sexually abuse PLAINTIFF or otherwise violate appropriate sexual boundaries between adult ministerial servants and minor congregants.

248. It was reasonably foreseeable that when the elders learned that Pandelo had been

accused of molesting more than one minor prior to the conclusion of his molestation of PLAINTIFF, that his continued association with the HACKENSACK CONGREGATION, absent any warning to PLAINTIFF or her parents or other members of these congregations, would mean that there was a heightened risk that Pandelo would sexually abuse PLAINTIFF or otherwise violate appropriate sexual boundaries between adult ministerial servants and minor congregants.

249. WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 undertook a duty to protect minor congregants, like PLAINTIFF, who came into contact with their agents, like Pandelo, through their participation in congregation activities, from being sexually abused by their agents, including Pandelo.

250. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to his nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

251. As a result of the Defendants' conduct, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

252. By reason of the foregoing, WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 are also liable to PLAINTIFF for punitive and exemplary damages.

COUNT IV –
NEGLIGENT AND/OR GROSSLY NEGLIGENT FAILURE TO TRAIN
RELATING TO CHILD ABUSE
Plaintiff v. All Defendants

253. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

254. GOVERNING BODY created, approved, or instituted all of the policies and procedures related to interactions between members of the Jehovah's Witnesses organization, and invited unrelated individuals, including minors such as PLAINTIFF, to become members of the Jehovah's Witnesses organization and congregate with each other.

255. GOVERNING BODY knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses, including ministerial servants like Pandelo.

256. GOVERNING BODY and its agents, servants, and employees, had a duty to establish adequate, competent, and effective professional training and education programs and procedures for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by ministerial servants and other agents, like Pandelo, who came into contact the minor congregants as a result of their positions within the Jehovah's Witness organization.

257. Given the prevalence of child molestation by Jehovah's Witnesses, GOVERNING BODY also had a duty to establish adequate, competent, and effective training and education programs for minor congregants and their parents calculated to educate minor congregants to identify and protect themselves against sexual abuse by ministerial servants, such as Pandelo.

258. GOVERNING BODY, and its agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like PLAINTIFF.

259. GOVERNING BODY, and its agents, servants, and employees, were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence, in failing to establish adequate and effective training and education programs and procedures for minor

congregants like PLAINTIFF, avoid sexual abuse by their agents.

260. WATCHTOWER knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses, including ministerial servants like Pandelo.

261. WATCHTOWER and its agents, servants, and employees, had a duty to establish adequate, competent, and effective professional training and education programs and procedures for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by ministerial servants and other agents, like Pandelo, who came into contact with minor congregants as a result of their positions within the Jehovah's Witness organization.

262. Given the prevalence of child molestation by Jehovah's Witnesses, WATCHTOWER also had a duty to establish adequate, competent, and effective training and education programs for minor congregants and their parents calculated to educate minor congregants to identify and protect themselves against sexual abuse by ministerial servants, such as Pandelo.

263. WATCHTOWER, and its agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like PLAINTIFF.

264. WATCHTOWER, and its agents, servants, and employees, were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence, in failing to establish adequate and effective training and education programs and procedures for minor congregants like PLAINTIFF, avoid sexual abuse by their agents.

265. FAIRLAWN CONGREGATION knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses, including ministerial servants like Pandelo.

266. FAIRLAWN CONGREGATION and its agents, servants, and employees, had a duty to establish adequate, competent, and effective professional training and education programs and procedures for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by ministerial servants and other agents, like Pandelo, who came into contact with minor congregants as a result of their positions within the Jehovah's Witness organization.

267. Given the prevalence of child molestation by Jehovah's Witnesses, FAIRLAWN CONGREGATION also had a duty to establish adequate, competent, and effective training and education programs for minor congregants and their parents calculated to educate minor congregants to identify and protect themselves against sexual abuse by ministerial servants, such as Pandelo.

268. FAIRLAWN CONGREGATION, and its agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like PLAINTIFF.

269. FAIRLAWN CONGREGATION, and its agents, servants, and employees, were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence, in failing to establish adequate and effective training and education programs and procedures for minor congregants like PLAINTIFF, avoid sexual abuse by their agents.

270. HACKENSACK CONGREGATION knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses, including ministerial servants like Pandelo.

271. HACKENSACK CONGREGATION and its agents, servants, and employees, had

a duty to establish adequate, competent, and effective professional training and education programs and procedures for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by ministerial servants and other agents, like Pandelo, who came into contact with minor congregants as a result of their positions within the Jehovah's Witness organization.

272. Given the prevalence of child molestation by Jehovah's Witnesses, HACKENSACK CONGREGATION also had a duty to establish adequate, competent, and effective training and education programs for minor congregants and their parents calculated to educate minor congregants to identify and protect themselves against sexual abuse by ministerial servants, such as Pandelo.

273. HACKENSACK CONGREGATION, and its agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like PLAINTIFF.

274. HACKENSACK CONGREGATION, and its agents, servants, and employees, were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence, in failing to establish adequate and effective training and education programs and procedures for minor congregants like PLAINTIFF, avoid sexual abuse by their agents.

275. DOES 1-100 knew or should have known of the problem of the sexual abuse of minors by Jehovah's Witnesses, including ministerial servants like Pandelo.

276. DOES 1-100 and their agents, servants, and employees, had a duty to establish adequate, competent, and effective professional training and education programs and procedures

for their agents, employees, and administrators, calculated to identify and prevent sexual abuse of minor congregants by ministerial servants and other agents, like Pandelo, who came into contact with minor congregants as a result of their positions within the Jehovah's Witness organization.

277. Given the prevalence of child molestation by Jehovah's Witnesses, DOES 1-100 also had a duty to establish adequate, competent, and effective training and education programs for minor congregants and their parents calculated to educate minor congregants to identify and protect themselves against sexual abuse by ministerial servants, such as Pandelo.

278. DOES 1-100, and their agents, servants, and employees were negligent, careless, and reckless, and acted willfully, wantonly and with gross negligence, in failing to establish adequate and effective professional training and education programs and procedures for their agents, calculated to prevent the sexual abuse of minor congregants, like PLAINTIFF.

279. DOES 1-100, and their agents, servants, and employees, were negligent, careless, and reckless, and acted willfully, wantonly, and with gross negligence, in failing to establish adequate and effective training and education programs and procedures for minor congregants like PLAINTIFF to avoid sexual abuse by their agents.

280. Defendants' negligent failures to establish adequate and effective training and education programs and procedures for minor congregants and for their agents, employees, and administrators proximately caused PLAINTIFF to suffer injuries as detailed below.

281. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to his nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

282. As a result of the Defendants' conduct, PLAINTIFF has and will become obligated

to expend sums of money for medical treatment.

283. By reason of the foregoing, WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 are also liable to PLAINTIFF for punitive and exemplary damages.

COUNT V –
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
Plaintiff v. Watchtower, Fairlawn Congregation, Hackensack Congregation and Does 1-100

284. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

285. Defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 knew, or in the exercise of reasonable care, should have known that their acts and omissions as described in this complaint would result in serious emotional distress to PLAINTIFF.

286. Defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 acted with willful, wanton, reckless, intentional and deliberate disregard for the likelihood that PLAINTIFF would suffer severe emotional distress as a direct and proximate result of the sexual abuse he endured.

287. The conduct of Defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 as alleged above was extreme and outrageous and went beyond all bounds of decency.

288. As a direct and proximate result of defendants' acts and omissions, PLAINTIFF suffered severe emotional distress.

289. As a result of the conduct of Defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

290. By reason of the foregoing, WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 are also liable to PLAINTIFF for punitive and exemplary damages.

COUNT VI –
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
Plaintiff v. All Defendants

291. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

292. Defendants knew, or in the exercise of reasonable care should have known, that their acts and omissions would result in serious emotional distress to PLAINTIFF.

293. Defendants WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 placed Pandelo in a position of power, trust and authority over PLAINTIFF, who in turn placed confidence in Pandelo. Defendants WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 owed PLAINTIFF a duty to ensure that Pandelo did not pose a threat of harm to PLAINTIFF.

294. Pandelo, as a ministerial servant in PLAINTIFF's congregation, owed a duty to PLAINTIFF to refrain from sexually assaulting and abusing her while acting as a servant-agent of Defendants WATCHTOWER, GOVERNING BODY, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100.

295. Defendants' negligent and careless breach of that duty was utterly reprehensible behavior and was taken with disregard for the likelihood that PLAINTIFF would suffer severe emotional distress as a direct result.

296. As a direct and proximate result of defendants' negligence as described above,

PLAINTIFF suffered severe emotional distress.

297. As a result of defendants' conduct, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

298. By reason of the foregoing, defendants are also liable to PLAINTIFF for punitive and exemplary damages.

COUNT VII –
SEXUAL ABUSE AND BATTERY

Plaintiff v. Watchtower, Fairlawn Congregation, Hackensack Congregation and Does 1-100

299. PLAINTIFF repeats, reiterates, and realleges each and every allegation contained in this complaint, inclusive, with the same force and effect as if fully set forth at length herein.

300. Each instance of Pandelo's sexual misconduct and inappropriate physical contact with PLAINTIFF constitutes battery.

301. WATCHTOWER, by its intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted Pandelo.

302. By declining to contact law enforcement about Pandelo's molestation of minor children prior to the conclusion of his molestation of PLAINTIFF, WATCHTOWER sought to cover up Pandelo's acts, and protect him from detection or punishment, and thereby ratified his sexual molestation of PLAINTIFF and others.

303. FAIRLAWN CONGREGATION, by its intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted Pandelo.

304. By declining to contact law enforcement about Pandelo's molestation of minor children prior to the conclusion of his molestation of PLAINTIFF, FAIRLAWN CONGREGATION sought to cover up Pandelo's acts and protect him from detection or

punishment, and thereby ratified his sexual molestation of PLAINTIFF and others.

305. HACKENSACK CONGREGATION, by its intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted Pandelo.

306. By declining to contact law enforcement about Pandelo's molestation of minor children prior to the conclusion of his molestation of PLAINTIFF, HACKENSACK CONGREGATION sought to cover up Pandelo's acts and protect him from detection or punishment, and thereby ratified his sexual molestation of PLAINTIFF and others.

307. DOES 1-100, by their intentional acts, omissions, negligence, knowing and willful failure to act affirmatively to prevent, detect, report, or investigate, aided and abetted Pandelo.

308. By declining to contact law enforcement about Pandelo's molestation of minor children prior to the conclusion of his molestation of PLAINTIFF, DOES 1-100 sought to cover up Pandelo's acts, and protect him from detection or punishment, and thereby ratified his sexual molestation of PLAINTIFF and others.

309. By reason of the foregoing, PLAINTIFF sustained physical and psychological injuries, including but not limited to, severe emotional distress, confusion, humiliation, fright, anxiety, a severe shock to her nervous system, and has been caused to suffer physical pain and mental anguish, and permanent emotional and psychological damage as a result thereof.

310. As a result of the conduct by Defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100, PLAINTIFF has and will become obligated to expend sums of money for medical treatment.

311. By reason of the foregoing, defendants WATCHTOWER, FAIRLAWN CONGREGATION, HACKENSACK CONGREGATION and DOES 1-100 are also liable to

PLAINTIFF for punitive and exemplary damages.

WHEREFORE, PLAINTIFF demands judgment against the defendants on each of the First, Second, Third, Fourth, Fifth, and Sixth causes of action in a sum that exceeds the jurisdictional limits of all lower courts, including compensatory and punitive damages, together with interest, costs and disbursements pursuant to the causes of action herein.

COUNT VIII –
PUNITIVE DAMAGES
Plaintiff v. All Defendants

312. Plaintiff repeats, reiterates, and re-alleges each and every allegation contained in the previous paragraphs as if set forth herein at length.

313. The aforesaid acts of Defendants were committed in outrageous, callous, wanton, and willful disregard for the safety, protection, and well-being of minors, including Plaintiff, warranting the imposition of punitive damages.

314. The actions and/or inactions of Defendants, jointly, severally, and/or through the conduct of Pandelo, were intentional, willful, and/or reckless in that Defendants' actions were intended to cause great harm to minors, including Plaintiff, and/or were done with deliberate disregard of a high degree of probability that such behavior would cause great harm to minors, including Plaintiff.

315. The actions and/or inactions of Defendants, jointly, severally, and/or through the conduct of Pandelo, against Plaintiff were extreme, callous, reckless, and/or wanton.

316. As a direct and proximate result of Defendants' wanton and willful disregard for the safety of minors, including Plaintiff, Plaintiff sustained physical, emotional, and psychological injuries, along with pain and suffering. The sexual abuse and resulting injuries to Plaintiff were caused solely and wholly by reason of the negligent and/or grossly negligent failures, as well as

the callous and wanton behavior, of Defendants in the hiring and retention of, as well as its failure to monitor or supervise, its employees and/or agents, including Pandelo.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, and/or individually, for compensatory and punitive damages, together with interest and costs in an unspecified amount, plus costs, disbursements, reasonable attorneys' fees, interest, and such other and further relief as the Court deems just and equitable.

DEMAND FOR JURY TRIAL

The Plaintiff demands a trial by jury on all of the triable issues of this Complaint, pursuant to Rules 1:8-2(b) and 4:35-1(a).

Dated: October 13, 2021

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/Rayna E. Kessler
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Attorney for Plaintiff Corrine Pandelo

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1(c), please take notice that Plaintiff designates Rayna E. Kessler, Esq. as trial counsel in this matter.

Dated: October 13, 2021

/s/Rayna E. Kessler
Rayna E. Kessler, Esq.

CERTIFICATION PURSUANT TO RULE 1:38-7(b)

I certify that confidential personal identifiers have been redacted from documents now submitted to the Court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

CERTIFICATION PURSUANT TO RULE 4:5-1

I certify that the dispute that Plaintiff is suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

Dated: October 13, 2021

/s/Rayna E. Kessler
Rayna E. Kessler, Esq.

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Attorneys for Plaintiff Corrine Pandelo

CORINNE PANDELO,

Plaintiff,

v.

**THE GOVERNING BODY OF
JEHOVAH’S WITNESSES,
FAIRLAWN CONGREGATION OF
JEHOVAH’S WITNESSES,
WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW
YORK, HACKENSACK
CONGREGATION OF JEHOVAH’S
WITNESSES, and JOHN AND JANE
DOES 1-100, whose identities are presently
unknown to Plaintiff, in their official and
individual capacities,**

Defendants.

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION - BERGEN COUNTY

: DOCKET NO. _____

:
: **CIVIL ACTION**

:
: **PLAINTIFF’S REQUEST FOR**
: **ADMISSIONS, SET ONE**

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:
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PLEASE TAKE NOTICE that pursuant to New Jersey Court Rule 4:22-1, Plaintiff hereby serves the following Requests for Admissions to be answered separately under oath no later than thirty (30) days after service of these Requests for Admissions. Your answer shall specifically admit or deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify the answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless stating that a reasonable inquiry was made and that the information known or readily obtainable is insufficient to enable an admission or denial. A party who considers that a matter of which an admission has been requested presents a genuine issue for trial, may not, on that ground alone, object to the request.

DEFINITIONS

1. “DEFENDANT” refers to the party to whom the following requests are addressed, as well as all affiliates, partners, directors, officers, employees, servants, agents, third-party contractors working on its behalf, and predecessor entities, including the predecessor’s affiliates, partners, directors, officers, employees, servants, agents, and third-party contractors acting on the predecessor’s behalf.

2. “SEXUAL ABUSE” means any inappropriate sexual contact and/or communication, including but not limited to all sexual contact and communications between adults and minors, all sexual contact imposed upon another person by use of force, fear, manipulation, or coercion, all sexual contact committed without consent, and all sexual activity by those sworn to celibacy.

3. “EMPLOYEE” means any person employed by YOU at any time or any PERSON, including volunteers, who provided any type of services to YOU, including but not limited to all of your present, former, or retired present, former, OR retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial

servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, district's circuits, schools, principals, teachers, coaches, employees, boards, directors, subsidiaries, counselors, associates, investigators, independent contractors, agents, representatives, accountants, volunteers, attorneys, and affiliated business entities.

4. "POLICIES AND PROCEDURES" means all formal and/or informal rules, guidelines, guidance, advice, FAQs, scripts, handbooks, and/or training materials.

5. The term "PLAINTIFF" refers to the Plaintiff in this particular case.

REQUESTS FOR ADMISSIONS

Request For Admission No. 1:

Clement Pandelo was a ministerial servant in the HACKENSACK CONGREGATION OF JEHOVAH'S WITNESSES at any time between 1979 and 1988.

Request For Admission No. 2:

Clement Pandelo was a ministerial servant in the FAIRLAWN CONGREGATION OF JEHOVAH'S WITNESSES at any time between 1979 and 1988.

Request For Admission No. 3:

Corinne Pandelo was a minor congregant at HACKENSACK CONGREGATION OF JEHOVAH'S WITNESSES at some point between 1979 and 1988.

Request For Admission No. 4:

Corinne Pandelo was a minor congregant at FAIRLAWN CONGREGATION OF JEHOVAH'S WITNESSES at some point between 1979 and 1988.

Request For Admission No. 5:

PLAINTIFF was a minor congregant at HACKENSACK CONGREGATION OF JEHOVAH'S WITNESSES and/or FAIRLAWN CONGREGATION OF JEHOVAH'S WITNESSES between the years of 1979 and 1988.

Request For Admission No. 6:

At any time between 1978 and 1989, FAIRLAWN CONGREGATION OF JEHOVAH'S WITNESSES supervised Clement Pandelo in his capacity as a ministerial servant.

Request For Admission No. 7:

At any time between 1978 and 1989, HACKSENSACK CONGREGATION OF JEHOVAH'S WITNESSES supervised Clement Pandelo in his capacity as a ministerial servant.

Request For Admission No. 8:

In or around 1988, Clement Pandelo was disfellowshipped from the Jehovah's Witnesses.

Request For Admission No. 9:

Clement Pandelo's disfellowship in or around 1988 was based on the allegations of sexual abuse of PLAINTIFF.

Request For Admission No. 10:

After 1988, Clement Pandelo was disfellowshipped for a second time.

Request For Admission No. 11:

Clement Pandelo's second disfellowship was based on additional allegations of sexual abuse of children, including PLAINTIFF.

Request For Admission No. 12:

After 1988, Pandelo was reinstated to the Jehovah's Witnesses twice.

Request For Admission No. 13:

After 1988, DEFENDANT was aware that Clement Pandelo pleaded guilty to crimes involving sexual abuse of more than one minor, including PLAINTIFF.

Request For Admission No. 14:

After 1988, DEFENDANT was aware that Clement Pandelo admitted under oath that he had sexually abused multiple children for over thirty years.

Request For Admission No. 15:

Prior to 1988, DEFENDANT was aware that Pandelo had admitted to sexual misconduct involving minor girls.

Request For Admission No. 16:

Prior to 1988, DEFENDANT was aware that Pandelo had admitted to sexual misconduct involving an adulterous affair with a teenaged girl.

Request For Admission No. 17:

Prior to 1988, Pandelo was publicly reproofed for sexual misconduct.

Request For Admission No. 18:

DEFENDANT never reported Pandelo's sexual abuse of minors to any law enforcement agency.

Request For Admission No. 19:

Prior to 1988, DEFENDANT knew that Pandelo sexually abused at least one child.

Request For Admission No. 20:

Ministerial servants are agents of DEFENDANT.

Request For Admission No. 21:

DEFENDANT appoints certain individuals who have been baptized to serve as ministerial servants.

Request For Admission No. 22:

Between the years of 1979 and 1988, the body of elders of a local Jehovah's Witness congregation identified potential candidates for the position of ministerial servant.

Request For Admission No. 23:

Between the years of 1979 and 1988, the body of elders of a local Jehovah's Witness congregation in concert with the circuit overseer, determined whether a potential candidate for ministerial servant was suitable, and lived his life in accordance with appropriate morals.

Request For Admission No. 24:

Between the years of 1979 and 1988, WATCHTOWER reviewed recommendations for the appointment of any individual to the position of ministerial servant.

Request For Admission No. 25:

Between the years of 1979 and 1988, DEFENDANT had authority to decide whether a candidate was elevated to the level of ministerial servant.

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Request For Admission No. 26:

Prior to April of 2001, WATCHTOWER published a series of handbooks that were distributed to elders of local Jehovah's Witness congregations.

Request For Admission No. 27:

The handbooks published by WATCHTOWER prior to April 2001 provided instructions to elders regarding how to respond to allegations of wrongdoing, including child molestation.

Request For Admission No. 28:

WATCHTOWER promulgated a policy that requires elders to investigate allegations of sexual abuse of a child.

Request For Admission No. 29:

WATCHTOWER promulgated a policy that provides that if there are not two witnesses to any alleged sexual abuse of a child, and the accused denies any wrongdoing, the accused is determined to be innocent and no corrective, protective or punitive action is taken by the congregation.

Request For Admission No. 30:

In 1997, WATCHTOWER disseminated a letter to all of the Bodies of Elders in United States Jehovah's Witness congregations seeking information on men who then served, or had previously served, in any appointed position (e.g., elder, ministerial servant, regular pioneer) and were also known to have engaged in child molestation.

Request For Admission No. 31:

In a 1997 letter, WATCHTOWER required each congregation to prepare reports detailing instances of child molestation, and to return the reports to WATCHTOWER's Service Department.

Request For Admission No. 32:

In 1998, WATCHTOWER sent a follow up letter to each United States Jehovah's Witness congregation, reminding these congregations' bodies of elders to send reports on men who then served, or had previously served, in any appointed position (e.g., elder, ministerial

servant, regular pioneer) and were also known to have engaged in child molestation, and possible legal consequences of appointing a known child molester to a position of authority.

Request For Admission No. 33:

Reports regarding the sexual abuse of children were received by the Service Department and kept by WATCHTOWER and GOVERNING BODY.

Request For Admission No. 34:

After receiving the written reports, WATCHTOWER and GOVERNING BODY did not implement procedures or policies to educate children and adult members of the risk of child molestation within the Jehovah's Witness organization, how to identify warning signs of molestation, or how to avoid dangerous situations.

Dated: October 13, 2021

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/Rayna E. Kessler

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CORINNE PANDELO,

Plaintiff,

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**THE GOVERNING BODY OF
JEHOVAH’S WITNESSES,
FAIRLAWN CONGREGATION OF
JEHOVAH’S WITNESSES,
WATCHTOWER BIBLE
AND TRACT SOCIETY OF NEW
YORK, HACKENSACK
CONGREGATION OF JEHOVAH’S
WITNESSES, and JOHN AND JANE
DOES 1-100, whose identities are presently
unknown to Plaintiff, in their official and
individual capacities,**

Defendants.

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION - BERGEN COUNTY

: DOCKET NO. _____

:
: **CIVIL ACTION**

:
: **PLAINTIFF’S DEMAND FOR**
: **PRODUCTION OF DOCUMENTS, SET**
: **ONE**

DEMAND FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Rule 4:18-1, Plaintiff demands the production for purposes of inspection and copying at the offices of Robins Kaplan LLP, 399 Park Avenue, Suite 3600, New York, New York 10022, within 45 days after service of the within pleadings, of the following items pertaining to the allegations of this Complaint.

Definitions

A. The term “YOU” or “YOUR” or “DEFENDANT” refers to ALL of the Defendant’s present, former, OR retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, district’s circuits, schools, principals, teachers, coaches, boards, directors, subsidiaries, counselors, associates, investigators, independent contractors, accountants, attorneys, AND affiliated business entities.

B. The term “PERPETRATOR” refers to Clement Pandelo.

C. The term “DOCUMENT” or “DOCUMENTS” and “WRITING” or “WRITINGS” refers to any AND ALL manner of written, typed, printed, reproduced, filmed OR recorded material AND ALL photographs, pictures, plans, OR other representations of any kind of anything pertaining, describing, referring, OR RELATING, directly OR indirectly, in whole OR in part, to the subject matter of each discovery request AND the term includes, but is not limited to: correspondence, papers, books, journals, ledgers, diaries, statements, memoranda, reports, invoices, work sheets, work papers, notes, transcriptions of notes, letters, abstracts, checks, diagrams, plans, blueprints, schematics, software programs, films, photographs, lists, logs, publications, advertisements, instructions, minutes, orders, purchase orders, messages, resumes, summaries, agreements, contracts, telegrams, telexes, cables, recordings, audio tapes, magnetic tapes, visual tapes, transcriptions of tapes OR records, computer tapes, books, speeches, pamphlets, leaflets, flyers, announcements, bulletins, periodicals, agenda, reports, opinions, charts, tabulations, digests, compilations, studies, expert analyses, evaluations, manuals, guides, research papers, articles, OR tangible things in POSSESSION, custody OR control of YOU or YOUR

present, former, OR retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, district's circuits, schools, principals, teachers, coaches, boards, directors, subsidiaries, counselors, associates, investigators, independent contractors, accountants, attorneys, AND affiliated business entities.

D. The term "POSSESSION" refers to ALL DOCUMENTS, WRITINGS AND things in the POSSESSION, custody, AND/OR control of YOU or YOUR present, former, OR retired governing body members, branch committee members, district overseers, circuit overseers, elders, ministerial servants, employees, volunteers, representatives, agents, secretaries, churches, congregations, branches, district's circuits, schools, principals, teachers, coaches, boards, directors, subsidiaries, counselors, associates, investigators, independent contractors, accountants, attorneys, AND affiliated business entities.

E. The term "RELATE TO," "RELATING TO," OR "REGARDING" refers to, in addition to the customary AND usual meaning, constituting, comprising, supporting, diminishing, contradicting, discussing, referring, reflecting, assessing, recording, describing, OR in any way relevant to, OR discoverable in whole OR in part.

F. The terms "AND," "OR," "AND/OR" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of this request any information which might be deemed outside their scope by another construction.

G. The term "ALL" refers to any and all.

DEMAND FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

ALL DOCUMENTS RELATING TO the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 2:

YOUR file RELATING TO the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 3:

YOUR confidential files RELATING TO the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 4:

ALL DOCUMENTS RELATING TO allegations, complaints, OR reports of sexual abuse of any minor(s) made against the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 5:

ALL DOCUMENTS RELATING TO investigations of sexual abuse of any minor(s) REGARDING the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 6:

ALL DOCUMENTS RELATING TO the PERPETRATOR's appointment as a ministerial servant.

REQUEST FOR PRODUCTION NO. 7:

ALL DOCUMENTS RELATING TO the Perpetrator's appointment as a Baptized Publisher.

REQUEST FOR PRODUCTION NO. 8:

ALL DOCUMENTS from OR RELATING TO any judicial committee regarding the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 9:

ALL DOCUMENTS RELATING TO or describing the duties AND obligations of ministerial servants within the Jehovah's Witness Church.

REQUEST FOR PRODUCTION NO. 10:

ALL DOCUMENTS RELATING TO or describing the process by which a person is nominated, appointed, evaluated, recommended, approved and installed as a ministerial servant within the Jehovah's Witness Church.

REQUEST FOR PRODUCTION NO. 11:

ALL DOCUMENTS RELATING TO or describing the duties AND obligations of Baptized Publishers within the Jehovah's Witness Church.

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REQUEST FOR PRODUCTION NO. 12:

ALL DOCUMENTS RELATING TO or describing the process by which a person is nominated, appointed, evaluated, recommended, approved and installed as a Baptized Publisher within the Jehovah's Witness Church.

REQUEST FOR PRODUCTION NO. 13:

Produce ALL form S-79a or S-79a-S forms RELATING TO the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 14:

Produce ALL form S-79b or S-79b-S forms RELATING TO the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 15:

Produce ALL letters of introduction REGARDING the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 16:

Produce ALL publisher cards REGARDING the PERPETRATOR.

REQUEST FOR PRODUCTION NO. 17:

Produce ALL DOCUMENTS RELATING TO Plaintiff.

REQUEST FOR PRODUCTION NO. 18:

Produce ALL DOCUMENTS pertaining to how reports of alleged sexual abuse perpetrated by appointees of Defendants against children should be reported, investigated, and/or otherwise addressed by Defendants during the time period 1977 to present.

REQUEST FOR PRODUCTION NO. 19:

Produce ALL DOCUMENTS RELATING to Defendants' awareness or knowledge of the allegations contained in the Complaint.

REQUEST FOR PRODUCTION NO. 20:

Produce ALL DOCUMENTS which reflect, refer to, or discuss the allegations in the Complaint.

REQUEST FOR PRODUCTION NO. 21:

Produce ALL DOCUMENTS including, but not limited to, all of your policies, rules, regulations, protocols, guidelines, standards, training manuals, instructions, pamphlets, and/or any other written material relating to handling claims or allegations of the sexual abuse of minors.

Dated: October 13, 2021

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/Rayna E. Kessler

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