

***Exhibit B***

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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MARION

JARED GRAFMYER,  
  
Plaintiff,  
  
v.  
  
WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
WATCHTOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA, and  
LANCASTER CONGREGATION OF  
JEHOVAH'S WITNESSES,  
  
Defendants.

No. 06C15281  
  
DECLARATION OF MERTON V.  
CAMPBELL

I, Merton V. Campbell, testify as follows:

1. I am over 18 years of age, of sound mind, and am competent to make this Declaration. I have personal knowledge of the matters contained herein, and they are all true and correct.
2. I have served as an Elder in the Jehovah's Witnesses Church since 1972.
3. Since 1952, I have served in the Service Department at the U.S. Branch Office of Jehovah's Witnesses in New York. I provide spiritual assistance to congregation Elders who call or write the Service Department for help. Prior to March 2001, the spiritual assistance provided by the Service Department, along with the appointment of Elders, was

1 communicated to congregations of Jehovah's Witnesses through the Watchtower Bible and  
2 Tract Society of New York, Inc. Since March 2001, this has been communicated through the  
3 Christian Congregation of Jehovah's Witnesses.

4 4. My duties in the Service Department also include monitoring the functioning,  
5 organization, and staffing of congregations of Jehovah's Witnesses, including reviewing the  
6 qualifications for the appointment of Elders to congregations of Jehovah's Witnesses in the  
7 United States.

8 5. Jehovah's Witnesses are not automatically appointed to serve as congregation  
9 Elders. Rather, they must first meet certain qualifications that are outlined in the Bible as  
10 follows: Before a male member of the congregation can be considered for appointment as a  
11 congregation Elder, he must first be baptized as one of Jehovah's Witnesses. Next, the  
12 individual must gain further knowledge of the Holy Scriptures and show a willingness to be  
13 used in a further way to assist others in the congregation. If he shows such a willingness, he  
14 must then meet Scriptural qualifications set out in 1 Timothy 3:8-13. Thereafter, he may  
15 qualify and be appointed as a ministerial servant. Although a ministerial servant would not  
16 provide spiritual supervision in the congregation, he could be assigned certain tasks to assist  
17 the congregation Elders as they carry out their duties. After a period of time—perhaps many  
18 years—a ministerial servant who has faithfully carried out his assignments and has gained  
19 more experience may meet the qualifications of a congregation Elder as outlined in 1  
20 Timothy 3:1-7 and Titus 1:6-9. When this occurs, the congregation Elders will make this  
21 recommendation to the circuit overseer (a representative of the Branch Office). If the circuit  
22 overseer agrees with the recommendation, it will then be forwarded to the Branch Office's  
23 Service Department. Approved Elders in the Service Department will then review the  
24 recommendation in accord with the guidelines outlined in the Holy Scriptures adopted by the  
25 Governing Body of Jehovah's Witnesses. The Branch office will then inform the local  
26 congregation's body of Elders, in writing, of their determination with regards to the

1 recommendation.

2 6. If an individual is appointed to serve as a congregation Elder, the letter of  
3 appointment from the Branch Office is read to the congregation. It is at this time that he is  
4 officially vested with ministerial authority. In other words, he is appointed as a congregation  
5 Elder.

6 7. Jehovah's Witnesses who serve as appointed Elders are recognized as ordained  
7 ministers and congregation Elders.

8 8. Like Jesus and his apostles, congregation Elders do not receive a salary for  
9 their ministerial work. Nonetheless, as ordained ministers and congregation Elders, they are  
10 responsible for providing spiritual supervision to the congregations, which includes hearing  
11 confessions and other confidential communications made to them by members of the  
12 congregation who are seeking religious or spiritual advice or comfort.

13 9. Congregation Elders are authorized to hear confessions and other private,  
14 confidential communications and to provide confidential spiritual guidance and counsel by  
15 virtue of the Holy Scriptures and the Governing Body of Jehovah's Witnesses.

16 10. According to the religious beliefs and practices of Jehovah's Witnesses,  
17 congregation Elders are expected to keep confession and other confidential communications  
18 confidential. An Elder who reveals such a confession or communication, without the express  
19 permission of the one making the confession or communication, may be disqualified from  
20 serving as an Elder.

21 11. All Elders of the Lancaster congregation are now, and were at all times  
22 relevant to this case, ordained ministers and the spiritual leaders of those congregations.

23 12. As with all congregations of Jehovah's Witnesses, the Lancaster Elders  
24 frequently provide spiritual counsel and advice to members of the congregation concerning  
25 highly confidential personal and spiritual matters

26 13. In addition, at all times relevant to this case, the Lancaster Elders occasionally

1 communicated with Elders serving in the Branch Office's Service Department in order to  
2 receive spiritual guidance and advice as to how to apply the religious doctrine and  
3 procedures of Jehovah's Witnesses to issues concerning the congregation and its members,  
4 as well as Elders serving as circuit or district overseers. As discussed more fully below, the  
5 religious beliefs of these Elders also require that any confidential communications that they  
6 have with congregation Elders must be kept strictly confidential. The spiritual guidance and  
7 advice given by the Elders serving in the Service Department is based on Jehovah's  
8 Witnesses' understanding of the Bible.

9 14. The elders of congregations of Jehovah's Witnesses are also responsible for  
10 conducting what are referred to as "judicial investigations" when a member of a  
11 congregation is accused of serious Scriptural wrongdoing.

12 15. The goal of a judicial investigation is to make certain that the Christian  
13 congregation remains spiritually and morally clean. (James 1:26) In doing so, the Elders  
14 endeavor to provide vital assistance to those who may have erred, with the hope of assisting  
15 them to regain their spirituality and relationship with God. (Galatians 6:1, 2) At times, a  
16 judicial committee will determine that an accused person should be disciplined internally  
17 based on Jehovah's Witnesses' understanding of the Bible.

18 16. Judicial discipline administered by Elders of Jehovah's Witnesses is based  
19 solely on Jehovah's Witnesses' understanding of the Bible as applied to the facts of the  
20 matter.

21 17. Jehovah's Witnesses recognize the Bible's admonition to confess one's sins to  
22 God. (1 John 1:8, 9 ("If we confess our sins, he is faithful and righteous so as to forgive us  
23 our sins and to cleanse us from all unrighteousness."))

24 18. In addition, Jehovah's Witnesses believe that there can be much benefit from  
25 speaking to the congregation Elders ("older men") regarding such confidential matters.  
26 (James 5:13-16 ("Is there anyone suffering evil among YOU? Let him carry on prayer. Is

1 | there anyone in good spirits? Let him sing psalms. Is there anyone sick among YOU? Let  
2 | him call the older men of the congregation to [him], and let them pray over him, greasing  
3 | [him] with oil in the name of Jehovah. And the prayer of faith will make the indisposed one  
4 | well, and Jehovah will raise him up. Also, if he has committed sins, it will be forgiven him.  
5 | Therefore openly confess YOUR sins to one another and pray for one another, that YOU  
6 | may get healed.”.) Jehovah’s Witnesses view confessions as confidential communications.  
7 | (Proverbs 25:9.)

8 |         19. Jehovah’s Witnesses do not believe that the confidentiality of communications  
9 | they may have with the congregation Elders is limited to confessions. Rather, as outlined in  
10 | James 5:13-16, Jehovah’s Witnesses are encouraged to seek the spiritual assistance of the  
11 | elders in a variety of life situations. Jehovah’s Witnesses view all such discussions as  
12 | confidential communications.

13 |         20. Elders do not allow extraneous third parties to be a party to a confidential  
14 | communication. However, at times, more than one Elder may be a party to the conversation.  
15 | For instance, it is Jehovah’s Witnesses’ religious belief and practice to have at least three  
16 | Elders present during judicial committee hearings. (Deuteronomy 17:6; Deuteronomy 19:15;  
17 | Matthew 18:15-17; 2 Corinthians 13:1; 1 Timothy 5:19) Before one becomes one of  
18 | Jehovah’s Witnesses, he is made aware of this provision. *Your Word Is a Lamp To My Foot*,  
19 | pages 176-79; *Organization for Kingdom-Preaching and Disciple-Making*, pages 159-65;  
20 | *Organized to Accomplish Our Ministry*, pages 145-47; *Organized To Do Jehovah’s Will*,  
21 | pages 151-2. In addition, there may be instances where a husband and wife, or a parent and  
22 | child, may together seek or would be provided with spiritual advice or consolation from the  
23 | Elders. All participants to these conversations also view these conversations as confidential.

24 |         21. In addition, the religious doctrine of Jehovah’s Witnesses requires that all  
25 | Elders keep these matters confidential. *The Watchtower*, April 1, 1971, pages 222-224;  
26 | *Kingdom Ministry*, July 1975; *The Watchtower*, December 15, 1975, pages 764-66; *The*

1 *Watchtower*, September 1, 1983, pages 21-26; *The Watchtower*, September 15, 1989, pages  
2 10-15; *The Watchtower*, September 1, 1991, pages 22-27; *The Watchtower*, November 15,  
3 1991, pages 19-23. Indeed, an Elder who reveals the contents of a confidential  
4 communication may be subject to removal.

5 I hereby declare that the above statement is true to the best of my knowledge and  
6 belief, and that I understand it is made for use as evidence in court and is subject to penalty  
7 for perjury.

8 DATED: October 23, 2006.

9  
10 By Merton V. Campbell  
Merton V. Campbell