

Exhibit AA

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

TRACY CAEKAERT, and
CAMILLIA Mapely,

Plaintiffs,

vs.

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

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

Defendants,

_____)

Expert Videotaped Deposition
In Person/Zoom Videoconference

Bradley Lovett

August 11, 2023

Reported By: Gidgette Nieves, CSR No. 10142
WORDS COURT REPORTING SERVICES, INC.
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09:50:46 1 different than an elder or is that the same?

09:50:49 2 A Well, we didn't have elders at the time.
09:50:52 3 And they needed to fill these slots. And -- you'll
09:51:00 4 notice even my mother was put in there.

09:51:04 5 Q And that's not typical is it to have a
09:51:07 6 female on here as a servant or an elder or
09:51:11 7 anything?

09:51:11 8 A At that time -- it wasn't typical but it
09:51:14 9 wasn't uncommon.

09:51:16 10 Q Okay. How many approximately people were
09:51:19 11 at the -- in the new Hardin congregation in 1971, if
09:51:23 12 you remember?

09:51:25 13 A Maybe -- maybe 30, 35. I'm just
09:51:30 14 guessing.

09:51:33 15 Q And this -- this document we're looking at
09:51:36 16 Exhibit 1, it looks like it came from the Watch
09:51:40 17 Tower Society in New York?

09:51:42 18 A Yes.

09:51:43 19 Q Looks like the Watch Tower Society is
09:51:45 20 saying that -- I'll read it. Their pleased to
09:51:50 21 advise that the servant appointments to the
09:51:54 22 positions below have been made.

09:51:56 23 Did you understand that the Watch Tower
09:52:00 24 Society had approved these -- these specific
09:52:02 25 appointments?

09:52:03 1 A Well, when the letter came back that

09:52:05 2 was --

09:52:05 3 Q That's what this letter is saying?

09:52:07 4 A Uh-huh.

09:52:08 5 Q The Watch Tower Society approved these
09:52:12 6 appointments, correct?

09:52:13 7 A Uh-huh, yeah.

09:52:14 8 Q Okay. And again, I'm sorry, I don't know
09:52:18 9 if you answered that question. About how many
09:52:19 10 people were in the congregation at that time?

09:52:22 11 A 30, maybe 35.

09:52:24 12 Q How did you go about finding these
09:52:26 13 people?

09:52:27 14 A We -- we contacted them in the -- either
09:52:32 15 in our house-to-house ministry and some had known in
09:52:39 16 some other areas they -- they -- and they wanted
09:52:41 17 to -- to attend so they had moved to Hardin and they
09:52:48 18 began attending once we had a -- a meeting plan.

09:52:55 19 Q Okay. If you look at the bottom of this
09:53:01 20 document, sir --

09:53:02 21 A Uh-huh.

09:53:03 22 Q -- in the fine print down there it states
09:53:06 23 that "Please see that the newly appointed servant
09:53:10 24 becomes thoroughly familiar with his duties as they
09:53:14 25 are set forth in the book. Your world is a Lamp to

09:53:17 1 my foot, comma, and then the Kingdom ministry." Do
09:53:22 2 you see that, sir?

09:53:23 3 A Yeah, uh-huh.

09:53:26 4 Q And are those books that you would -- the
09:53:28 5 congregation would get from the Watch Tower
09:53:31 6 Society?

09:53:31 7 A Yes.

09:53:32 8 Q And you understood from this letter that
09:53:33 9 the servants in this congregation, the new servants
09:53:38 10 needed to become familiar with the duties that are
09:53:40 11 set forth in those books?

09:53:42 12 A Yes.

09:53:42 13 Q Okay. That's part of the job of being a
09:53:45 14 servant in a new congregation?

09:53:50 15 A Yeah.

09:53:57 16 Q Do you recall when the first elders were
09:54:00 17 appointed on this new congregation?

09:54:04 18 A Probably. I think the arrangement came in
09:54:06 19 about '71, I think.

09:54:08 20 Q Who were the original elders?

09:54:14 21 A I can't remember. Martin Svenson I think
09:54:21 22 was one. Harold Rimby. And they put me down even
09:54:27 23 though I think I been baptized six months or
09:54:32 24 something at the time. I'm trying to think if there
09:54:39 25 were others. I can't remember.

10:20:07 1 BY MR. SHAFFER:

10:20:07 2 Q Is this a document -- or have you ever
10:20:08 3 seen a document like this before?

10:20:10 4 A Uh-huh.

10:20:11 5 Q What kind of document is this? What is
10:20:16 6 this?

10:20:16 7 A It's -- I forget the -- the number on it.
10:20:18 8 But it was where they put the
10:20:20 9 recommendations for elder's ministerial service.

10:20:23 10 Q Okay. When you say "they put the
10:20:26 11 recommendation," you mean the circuit overseer would
10:20:29 12 do that?

10:20:30 13 A The local congregation along with the
10:20:34 14 circuit overseer.

10:20:34 15 Q Okay. And then if we flip to the second
10:20:37 16 page of Exhibit 3, I'm going to direct you to --
10:20:46 17 let's go back to the first page. Just one second.
10:20:54 18 The stamp up here in the upper left-hand corner
10:20:58 19 duplicate copy to "society for return after
10:21:01 20 approval"?

10:21:02 21 MR. MCCABE: There's no stamp on this
10:21:04 22 copy.

10:21:05 23 BY MR. SHAFFER:

10:21:05 24 Q Do you see where it says "duplicate copy
10:21:09 25 to Society for return after approval." Do you see

10:21:11 1 that, Mr. Lovett?

10:21:13 2 A Yes.

10:21:13 3 Q And is that referring to the copy that
10:21:15 4 would go to New York that would get stamped either
10:21:18 5 approving or not approving the elders and then come
10:21:22 6 back to the congregation?

10:21:23 7 A Yeah.

10:21:24 8 Q And if we flip to the next page, same
10:21:32 9 corner there, upper left-hand corner. "Governing
10:21:37 10 body has approved the recommendations on the reverse
10:21:40 11 side as indicated by the Watch Tower Society stamp,"
10:21:42 12 below; do you see that, Mr. Lovett?

10:21:44 13 A Yes.

10:21:45 14 Q And then there's the Stamp Watch Tower
10:21:47 15 Bible and Tract Society New York?

10:21:48 16 A Yes.

10:21:50 17 Q SCL, May 7th, 1984. You see that?

10:21:53 18 A Yes.

10:21:53 19 Q Is that the Watch Tower Society then
10:21:56 20 approving the appointment of those elders on the
10:21:57 21 previous page?

10:21:58 22 A Yes.

10:21:59 23 Q Okay. Is that how the process worked in
10:22:01 24 the 70s as you understood it?

10:22:04 25 A As I recall, Uh-huh.

10:27:17 1 approved by the Watch Tower Society?

10:27:20 2 A No.

10:27:22 3 MR. TAYLOR: Again, my objection to the
10:27:23 4 form of the question.

10:27:25 5 BY MR. SHAFFER:

10:27:25 6 Q Mr. Lovett do you understand the
10:27:27 7 question?

10:27:27 8 A Uh-huh, yes.

10:27:28 9 Q Are you aware of anybody ever being
10:27:30 10 appointed an elder to a congregation that was not
10:27:34 11 approved by the Watch Tower Society?

10:27:36 12 A I -- I don't know. I'm --

10:27:37 13 Q You don't know whether you're aware of
10:27:38 14 it?

10:27:39 15 A If there is another method, I have no
10:27:42 16 idea.

10:27:42 17 Q Okay. So the only method you're aware of
10:27:45 18 is when the Watch Tower Society approves it?

10:27:48 19 MR. TAYLOR: Again, objection to the form
10:27:49 20 of the question.

10:27:54 21 BY MR. SHAFFER:

10:27:54 22 Q Yes or no?

10:27:57 23 A They've always handled it this way, that's
10:27:59 24 it.

10:28:01 25 Q Okay. All right. You become an elder in

10:28:06 1 1971 in Hardin. Tell me how you learn to do your
10:28:10 2 job as an elder?

10:28:14 3 A From what we see in the publications.

10:28:21 4 Q Let's talk about that for a second. Which
10:28:25 5 publications are we talking about?

10:28:28 6 A Actually anything pertinent, I guess.

10:28:33 7 Q Kingdom ministry school coursebook?

10:28:36 8 A That could be, Uh-huh, yes.

10:28:39 9 Q Okay. And would that be a book that would
10:28:41 10 be at a, like an elder training convention?

10:28:47 11 A Yeah.

10:28:47 12 Q Okay. And who would put on those
10:28:49 13 conventions, those elder training conventions?

10:28:53 14 A The -- we say the branch though we didn't
10:28:55 15 -- the -- yeah, Watch Tower put them on through the
10:29:00 16 branch arrangement.

10:29:02 17 Q In your mind during this period of time
10:29:04 18 was there a difference between the branch and the
10:29:07 19 Watch Tower?

10:29:08 20 A Well in my own mind I just -- we just
10:29:11 21 refer to it in general. We always just -- if they
10:29:14 22 say the Society or whatever.

10:29:17 23 Q They'd say the Society?

10:29:19 24 A Well, we would amongst ourselves. No,
10:29:22 25 they've -- they've approved this recommendation or

10:30:18 1 talked about the publication. You mentioned
10:30:21 2 publications. I mentioned the Kingdom Ministry
10:30:24 3 coursebook. And then we talked about that would be
10:30:27 4 introduced to the elders at a -- like an elder
10:30:30 5 training convention.

10:30:31 6 A It could be. They did it a number of
10:30:34 7 different ways.

10:30:34 8 Q And as a circuit overseer you've attended
10:30:39 9 and instructed elders at a Kingdom School Ministry
10:30:43 10 course, haven't you?

10:30:44 11 A Yes.

10:30:45 12 Q And that's -- is that a meeting where
10:30:47 13 you'll meet with elders and you'll have literature
10:30:50 14 from the Watch Tower Society with you that you go
10:30:53 15 through kind of on a schedule with the elders to
10:30:56 16 instruct them how to do their job. Is that a fair
10:31:00 17 description?

10:31:01 18 A Well, a lot of that changed over the years
10:31:04 19 too. And I'm trying to think back on the various
10:31:13 20 methods or approaches. But there would be -- our
10:31:18 21 schools we would have that would deal with certain
10:31:23 22 aspects of -- of the arrangement. They didn't --
10:31:28 23 they didn't comprehensively do everything all at
10:31:30 24 once, they just -- and that's where you would learn
10:31:34 25 certain things. But all of those things can be

10:31:37 1 abridge by letters or -- or other publications that
10:31:40 2 might come out later.

10:31:41 3 Q So everything in the Kingdom school
10:31:44 4 ministry course could be abridged by a letter that
10:31:47 5 would come from the Watch Tower Society or other
10:31:50 6 publications; is that fair?

10:31:51 7 A Or some direction, you know, specifically
10:31:53 8 dealing with -- with that subject.

10:31:56 9 Q Okay. Do you know who James Roland is?

10:31:57 10 A Yes.

10:31:58 11 Q He's been deposed. And he said when he
10:32:01 12 was appointed as an elder he went to a training
10:32:05 13 course for elders in Billings.

10:32:08 14 A Uh-huh.

10:32:09 15 Q And he described going through the Kingdom
10:32:10 16 school ministry course.

10:32:12 17 A Uh-huh.

10:32:12 18 Q Does that ring a bell to you having an
10:32:15 19 elder training in Billings at any point in time
10:32:18 20 or?

10:32:18 21 A We never did in -- in Billings.

10:32:21 22 Q Where did you do them? Where did the
10:32:23 23 Hardin congregations elders have their Kingdom
10:32:26 24 school ministry course?

10:32:27 25 A I don't know. I was gone.

10:32:28 1 Q Okay. But in the period of let's say the
10:32:35 2 late 1970s at least through the mid '80s were elders
10:32:41 3 trained at a Kingdom school ministry course with a
10:32:46 4 document called the Kingdom school ministry
10:32:49 5 course?

10:32:51 6 A I don't -- it was pretty much related to a
10:32:59 7 particular subject; whatever it might happen to be.
10:33:02 8 There's -- I mean you could -- you could spend
10:33:05 9 months on -- on some of that.

10:33:06 10 Q But sure. Let's not -- I don't want to
10:33:08 11 get into the particulars of what was being trained
10:33:12 12 and taught or instructed. But just in general as a
10:33:15 13 concept isn't that how elders would learn to do
10:33:18 14 their job in the late 70s to mid 80s, they'd go to a
10:33:21 15 Kingdom school ministry course with publications
10:33:23 16 from the Watch Tower Society?

10:33:24 17 A Most --

10:33:25 18 MR. TAYLOR: Again objection to the form
10:33:26 19 of the question.

10:33:28 20 BY MR. SHAFFER:

10:33:28 21 Q You can answer. It's okay.

10:33:30 22 A Most of the time. What my -- what I was
10:33:35 23 trying to say a minute ago -- what was your
10:33:37 24 question?

10:33:39 25 Q As a general concept late 1970s to the mid

10:33:43 1 '80s, elders would be trained on how to do their job
10:33:47 2 and what the expectations were from the Watch Tower
10:33:50 3 Society by going through the Kingdom Ministry course
10:33:54 4 publication at a -- at a convention or a training;
10:33:57 5 is that right?

10:33:58 6 A We had those schools.

10:34:00 7 Q Okay.

10:34:00 8 A And I'm just saying it from my own
10:34:03 9 standpoint in our last meeting.

10:34:04 10 VIDEOGRAPHER: Let's -- let's look at
10:34:05 11 Document Number 4. This gentleman will help you.
10:34:18 12 Thank you, sir.

10:34:36 13 MR. SHAFFER: All right. Exhibit 4 is the
10:34:37 14 Kingdom school MINISTRY course.

10:34:42 15 (Exhibit 4 marked for identification.)

10:34:42 16 MR. MCCABE: It's actually called the
10:34:44 17 "Kingdom Ministry School Course."

10:34:47 18 BY MR. SHAFFER:

10:34:47 19 Q Kingdom Ministry School. "Compiled and
10:34:50 20 published by the Watch Tower Bible and Tract Society
10:34:53 21 of Pennsylvania, 1972."

10:35:02 22 Have you seen -- no this is just a copy of
10:35:05 23 it. Have you seen this publication in book form
10:35:12 24 before?

10:35:14 25 A I -- I don't recall. They -- there used

10:35:18 1 to be a book I believe that was, you know, bound and
10:35:24 2 that they used in these courses.

10:35:29 3 Q Okay.

10:35:29 4 A And it was -- it was abridge at this time
10:35:32 5 went on and even the materials were done. They
10:35:34 6 would -- not everybody went to the same school,
10:35:40 7 taught the same thing. They --

10:35:46 8 Q Let's flip to the next page. Thank you,
10:35:54 9 sir.

10:35:55 10 All right. The first few words here "The
10:35:57 11 Kingdom Ministry School course has been arranged by
10:35:59 12 the Watch Tower Bible and Tract Society to help
10:36:04 13 overseers become equipped to shepherd the flock of
10:36:07 14 God. The school was dedicated to Jehovah God and
10:36:12 15 the advancement of Kingdom interest." What does
10:36:15 16 that mean to you?

10:36:15 17 A Better do a job. Is that what you mean?

10:36:19 18 Q Okay. And when it says "Watch Tower Bible
10:36:21 19 and Tract Society" in that first paragraph, what
10:36:24 20 does that mean to you? Does that mean a particular
10:36:26 21 corporation or is just a society like we've talked
10:36:30 22 about?

10:36:31 23 A Just a society in general and most all of
10:36:33 24 it.

10:36:34 25 Q Is it fair to say that elders are expected

10:36:37 1 to kind of know what's in this document, the Kingdom
10:36:41 2 Ministry School course?

10:36:43 3 A Well, as many as -- as they will attend
10:36:48 4 it. But like I say, they're usually in a
10:36:53 5 different -- a different times and they may have
10:36:56 6 added material or subtracted material depending on
10:37:00 7 the circumstance. I'd say generally that's --
10:37:05 8 that's true.

10:37:06 9 Q It's true in general that elders are
10:37:08 10 expected to know the material in this document; is
10:37:10 11 that fair?

10:37:11 12 A Yeah, they are instructed about it.

10:37:16 13 Q Who are the instructors at a Kingdom
10:37:19 14 Ministry school course?

10:37:22 15 A Generally it's local circuit overseer,
10:37:26 16 generally at that time.

10:37:28 17 Q Okay. And who decides what materials
10:37:30 18 comes to the course?

10:37:33 19 A The branch -- it's -- it's -- it's
10:37:36 20 printed, you know, they make that decision. And
10:37:39 21 then how it's taught we might have a lot of
10:37:45 22 discretion as to what we would do if we were
10:37:50 23 teaching something like that. How you present it.

10:37:54 24 Q Okay. I think what you're saying is the
10:37:56 25 branch would provide the circuit overseer the

10:37:58 1 material, and then the circuit overseer would have
10:38:02 2 discretion how to teach that material at the -- at
10:38:07 3 the school?

10:38:07 4 A Yeah, yes.

10:38:08 5 Q Is that how it was in the 1970s, 1980s?

10:38:13 6 A As best I can remember, yes.

10:38:36 7 Q Do you remember any other documents beside
10:38:39 8 the Kingdom Ministry School course that you would
10:38:42 9 have as a circuit overseer at a -- at an overseer
10:38:49 10 training?

10:38:50 11 A Sometimes there might be letters that have
10:38:52 12 come directly and if it's making a correction or
10:38:56 13 something, and they might get that, that's about all
10:39:00 14 I can think of.

10:39:02 15 Q And are you speaking about this kind of
10:39:04 16 your personal experience as a circuit overseer at
10:39:08 17 this courses?

10:39:09 18 A Uh-huh, yes.

10:39:16 19 Q Okay. I want to see if we're done with
10:39:19 20 Document 2. Give me a second. I'm going to look at
10:39:22 21 Document 2 and see if we're done with it.

10:40:05 22 Are you familiar with the books that are
10:40:07 23 entitled "To Pay Attention to Yourselves and All The
10:40:10 24 Flock"?

10:40:10 25 A Yes.

10:40:11 1 Q What's that book used for?

10:40:14 2 A More or less the same thing, organization.

10:40:17 3 And I'm thinking about the same. Well have lot of

10:40:21 4 changes in titles.

10:40:23 5 Q Sure. Just in general your recollection

10:40:25 6 you say the same thing. Is it to instruct and help

10:40:31 7 elders understand their obligations to their

10:40:35 8 congregations?

10:40:35 9 A Yes.

10:40:37 10 Q I'm just asking. These documents that I'm

10:40:40 11 personally not familiar with like the Kingdom

10:40:43 12 Ministry School course. The Pay attention to

10:40:46 13 Yourself and all the Flock. The branch Organization

10:40:51 14 Manual. Organized to accomplish our Religion.

10:40:53 15 Those are documents I'm not familiar, so I'm kind of

10:40:56 16 just hoping you can help me understand what those

10:40:58 17 documents are used for. Does that make sense?

10:41:02 18 A No, I understand what you're asking.

10:41:02 19 Yeah, the one that referred to at the beginning,

10:41:06 20 none of us elders know anything about that, that's

10:41:09 21 just internally with the -- the branch or

10:41:17 22 organization, and usually a small part of that.

10:41:21 23 Q Okay. That's the one you were confused on

10:41:23 24 Exhibit 2?

10:41:24 25 A Yes.

10:41:25 1 Q Branch Organization?

10:41:27 2 A Yeah, we never -- we didn't follow -- we
10:41:30 3 weren't involved with that. It may be things from
10:41:33 4 it, may be repeated in other places. But none of
10:41:37 5 those were ever handed out to anybody that I know
10:41:40 6 of.

10:41:41 7 Q How about a circuit overseer. Did you
10:41:43 8 ever see that document, the Branch organization
10:41:50 9 Manual?

10:41:51 10 A No, we didn't get any of that.

10:41:54 11 Q Okay. Do you know who used that book, the
10:41:57 12 Branch Organization Manual?

10:42:00 13 A No.

10:42:03 14 Q Okay. I think we're probably done with
10:42:05 15 Exhibit 2 then.

10:42:39 16 MR. SHAFFER: Let's look at Tab 5, mark
10:42:43 17 Exhibit 5.

10:42:44 18 (Exhibit 5 marked for identification.)

10:42:44 19 BY MR. SHAFFER:

10:42:44 20 Q All right. This is a book I've mentioned
10:42:47 21 "Pay Attention to Yourself and all the Flock." Flip
10:42:51 22 to the third page. There you go. It says "Kingdom
10:43:01 23 Ministry School Textbook." Do you see that, Mr.
10:43:06 24 Lovett?

10:43:07 25 A Yes.

10:43:07 1 Q Is that in reference to the fact that this
10:43:10 2 is a sort of a book you have in an elder ministry
10:43:14 3 school?

10:43:15 4 A Yes.

10:43:16 5 Q Okay, in general. And go to the next
10:43:19 6 page. It says "Published by Watch Tower Bible and
10:43:23 7 Tract Society. This one is of New York, September
10:43:26 8 1977. I assume the fact that this one is from New
10:43:35 9 York and the previous one was published and
10:43:37 10 distributed by Watch Tower Bible and Tract Society
10:43:41 11 Pennsylvania. I -- I assume that didn't effect your
10:43:44 12 job at all as a circuit overseer teaching this
10:43:47 13 stuff, did it?

10:43:48 14 A I don't -- no, I don't believe so.

10:43:55 15 Q All right. So if we can look at this
10:43:59 16 page. You got there. Thank you. Bate's number
10:44:00 17 229, this is WTNY229. The top there's "To the
10:44:08 18 student." Who would the student be in this
10:44:12 19 course?

10:44:13 20 A Probably the elders I would think.

10:44:15 21 Q Okay. Pay Attention to Yourselves and All
10:44:18 22 the Flock is a continuation of the Kingdom of
10:44:23 23 Ministry school course. So it looks like this is
10:44:26 24 kind of an addition to, and you've kind of mentioned
10:44:29 25 this, this morning. You have abridgements or

10:44:31 1 additions to the Kingdom of School -- Kingdom
10:44:34 2 Ministry School coursebook. This would be one of
10:44:37 3 those -- looks like this would be one of those
10:44:40 4 additions to it; is that right?

10:44:42 5 A I don't know as you would say it's an
10:44:44 6 addition, but it would explain many things that have
10:44:49 7 already been taught or they would go back and deal
10:44:52 8 with that.

10:44:52 9 Q Okay. Is this a document, sir, that you
10:45:02 10 became familiar with as an elder and a circuit
10:45:05 11 overseer?

10:45:06 12 A Well you tried, uh-huh.

10:45:08 13 Q Okay. That's what the Watch Tower Society
10:45:11 14 wanted you to do, correct?

10:45:15 15 A Yes.

10:45:39 16 MR. SHAFFER: Okay. Number 6. Document
10:45:40 17 number 6.

10:45:43 18 (Exhibit Number 6 marked for identification.)

10:45:43 19 BY MR. SHAFFER:

10:45:43 20 Q Again, bottom right corner on the cover
10:45:45 21 page, Kingdom Ministry School Textbook, and it says
10:45:48 22 KS81. The next page Published by Watch Tower Bible
10:45:53 23 and Tract Society of New York. This one is 1981. I
10:46:04 24 forgot to mention that. This one starts -- if you
10:46:09 25 look at the table of content, sir, Bate's document

10:52:07 1 Q Skip one. Let's go to 28734. Thank you.

10:52:21 2 Thank you. I want to point your
10:52:22 3 attention, Mr. Lovett, to this paragraph here
10:52:24 4 starting with general information.

10:52:27 5 A Uh-huh.

10:52:28 6 Q "General information is here published
10:52:30 7 concerning the duties of elders and ministerial
10:52:34 8 servants. Judicial procedures and various features
10:52:37 9 of congregation organization."

10:52:39 10 Is that consistent with how you understood
10:52:42 11 this document that it was for the purpose of
10:52:47 12 communicating the duties of elders and ministerial
10:52:51 13 servants?

10:52:53 14 MR. MCCABE: Among other things.

10:52:54 15 BY MR. SHAFFER:

10:52:54 16 Q Among other things. Is that how
10:52:56 17 understand it?

10:52:58 18 A Uh-huh.

10:52:59 19 Q That's a yes?

10:53:00 20 A Yes.

10:53:01 21 Q Thank you.

10:53:25 22 We've talked about a few other
10:53:25 23 publications. If you talked about letters, would
10:53:27 24 that be like an all body as an elder letter?

10:53:31 25 A It could be.

10:53:32 1 Q And that could have instruction to elders
10:53:35 2 on how to perform their duties?

10:53:36 3 A Yes.

10:53:37 4 Q Okay. Awake magazines?

10:53:43 5 A Not so much.

10:53:44 6 Q What was the purpose of the Awake
10:53:47 7 magazine?

10:53:48 8 A Generally distributed to the public and --
10:53:50 9 but it didn't generally use -- deal with the -- how
10:53:54 10 to organize this or that.

10:53:57 11 Q Okay. How about the our Kingdom service
10:54:01 12 newsletters?

10:54:02 13 A They were used for the weekly service
10:54:08 14 meetings part.

10:54:09 15 Q Okay. How about the Watch Tower
10:54:13 16 magazine?

10:54:15 17 A What would you want to know.

10:54:18 18 Q What was the purpose of the Watch Tower
10:54:20 19 magazine. Did it --

10:54:21 20 Go ahead.

10:54:22 21 A Instructed. It instructed you know.

10:54:25 22 But --

10:54:27 23 Q Instructed elders?

10:54:29 24 A Yeah. And generally everybody. You know,
10:54:33 25 anybody can get a Watch Tower. And there were any

11:01:05 1 the flock book, and you had a question about it.
11:01:08 2 What it meant, how to apply it, how to instruct it,
11:01:11 3 what would you do? Who would you call?

11:01:15 4 A Well, they would generally have you put it
11:01:17 5 in writing. But --

11:01:19 6 Q You say they?

11:01:21 7 A I would call the -- what we call the
11:01:25 8 branch now. But who was handling the work in the
11:01:32 9 United States.

11:01:33 10 Q Okay. So either write to the branch or
11:01:35 11 call somebody at the branch with a question?

11:01:38 12 A Uh-huh.

11:01:38 13 Q That was a yes?

11:01:40 14 A Yes.

11:01:46 15 Q And did you understand -- let's again go
11:01:48 16 back to your first period of time as an elder. Did
11:01:53 17 you understand that you could be removed from your
11:01:57 18 position?

11:01:58 19 A Yes.

11:01:58 20 Q Did you ever see that happen? Did you
11:02:00 21 ever see an elder removed?

11:02:02 22 A Yes.

11:02:03 23 Q And what was the reason that you saw
11:02:05 24 elders removed from their positions?

11:02:08 25 A Just a whole variety of -- of reasons.

11:02:13 1 If they -- then -- you know, for an
11:02:19 2 extended period of time they didn't come to the
11:02:22 3 meetings, they didn't participate in -- in the field
11:02:26 4 that, that type of thing. And it goes wrong, they
11:02:30 5 would of course they would be removed.

11:02:33 6 Q Okay. Failure to perform the duties of an
11:02:37 7 elder would that be a reason to be removed or
11:02:42 8 deleted as an elder?

11:02:44 9 A Yes. It depends on what -- what duties, I
11:02:46 10 guess too. Cause sometimes they couldn't help it.
11:02:47 11 They had some other reason, but they were not able
11:02:49 12 to share or participate.

11:02:51 13 Q And if an elder is deleted does that
11:02:54 14 follow kind of the process we talked about for the
11:02:58 15 appointment whereby there's that S2 form that has
11:03:01 16 appointments and deletions?

11:03:03 17 A Uh-huh.

11:03:03 18 Q If it's a deletion the elder's name would
11:03:06 19 be put in the column for the deletion that would be
11:03:08 20 sent to the branch office, right?

11:03:11 21 A Uh-huh.

11:03:11 22 Q That's a yes?

11:03:13 23 A With an explanation. What -- what the
11:03:15 24 situation was.

11:03:16 25 Q And the branch officer review it, and if

11:03:19 1 the branch office approved it, you'd get the
11:03:22 2 stamp?
11:03:22 3 A Come back just like you saw.
11:03:24 4 Q It would come back to the congregation?
11:03:27 5 A Yeah.
11:03:28 6 Q Okay. Branch office kept a copy of that
11:03:31 7 document as far as you know?
11:03:33 8 A As far as I know. And I don't, you know,
11:03:38 9 I don't know what they do with a lot of that. But
11:03:41 10 as far as I know.
11:03:44 11 Q You have not seen their files, I take
11:03:47 12 it?
11:03:47 13 A No.
11:03:48 14 Q Fair enough. Tell me about your files.
11:03:50 15 Did you keep files as an -- as an elder?
11:03:54 16 A Yes.
11:03:55 17 Q How would you keep those documents?
11:03:58 18 A Well, you just make a copy of whatever
11:04:00 19 reports you were sending in.
11:04:02 20 Q Okay. And would you keep hard copies?
11:04:07 21 Back in the '70s and '80s, would you keep the hard
11:04:10 22 copies?
11:04:11 23 A Yes.
11:04:11 24 Q Is there a file cabinet in the
11:04:14 25 congregation? Did you keep it at your house? How

11:55:21 1 literature?

11:55:22 2 A Almost never. I paid for it myself.

11:55:25 3 Q But you said, "Almost never." That means
11:55:27 4 you did at some point?

11:55:28 5 A No. Someone said I'm trying to just leave
11:55:31 6 it, leave it open. But I never --

11:55:33 7 Q I don't want to leave it open. I want a
11:55:38 8 yes or no.

11:55:41 9 A I never made any money on that if that
11:55:44 10 makes any -- any sense. But it was just a something
11:55:48 11 where we just -- we would give the literature to
11:55:52 12 whomever needed it. I never mentioned anything
11:55:55 13 about funds or whatever.

11:55:57 14 Q Did you ever Receive a single dollar from
11:56:01 15 placing Jehovah's Witness literature anyplace?

11:56:05 16 A Yes. I've seen -- Well, we had -- we had
11:56:06 17 25 cents for these little, little books, you know.
11:56:11 18 And I think there was one that sold for a dollar.
11:56:15 19 It was a children's book, or something like that.

11:56:18 20 Q So I'm reading from the 1977 Branch
11:56:21 21 Organization Manual, which is Exhibit 2. I'm at
11:56:25 22 Bate's number 1875. Paragraph 70. "In addition to
11:56:30 23 the income they may receive from placing literature,
11:56:32 24 the circuit and district overseers are given a
11:56:36 25 monthly allowance by the Society."

11:56:39 1

A Uh-huh.

11:56:39 2

Q Is that true or not true?

11:56:41 3

A That's true. It was enough. Ten bucks or

11:56:46 4

eight bucks or whatever. It was -- it was nothing

11:56:48 5

almost.

11:56:49 6

Q Okay. Do you remember exactly how much it

11:56:51 7

was in like 1978?

11:56:53 8

A No, I don't.

11:56:55 9

Q So you can't tell me how much your

11:56:58 10

allowance was from the Society?

11:56:59 11

A No. It wasn't -- it wasn't much. They

11:57:01 12

had like a yearly clothing allowance and it was \$60,

11:57:07 13

or something like that.

11:57:08 14

Q So you did receive money from the Society

11:57:10 15

during your work as a circuit overseer. Can we

11:57:15 16

agree on that?

11:57:16 17

A Yes, we -- we did, Uh-huh.

11:57:17 18

Q Okay. Did you use that money to buy

11:57:20 19

anything?

11:57:21 20

A Maybe to replace -- what is to pay for

11:57:25 21

what we had already almost viewed as a reimbursement

11:57:29 22

for what we had already expensed. What we had

11:57:32 23

already paid for.

11:57:33 24

Q Okay. But that would be in addition to

11:57:35 25

your gas reimbursement, correct, your monthly

12:12:40 1 A My mind is -- is very hard to recall a lot
12:12:46 2 of that. Not because I don't want to. I'm just
12:12:49 3 trying to think of what they -- cause there were all
12:12:52 4 kinds of little forms that you'd send in. You
12:12:54 5 respond on these little forms. We used to get angry
12:12:58 6 cause some of them were that big and you're supposed
12:13:00 7 to type on them, and -- but it was just routine
12:13:01 8 things.

12:13:02 9 Q Where would that form come from?

12:13:03 10 A That was from the branch. It was just
12:13:06 11 a -- and they I guess they went back and put it in
12:13:10 12 some file or something.

12:13:11 13 Q So you'd get all these forms from the
12:13:13 14 branch office in New York?

12:13:15 15 A Uh-huh.

12:13:16 16 Q That's a yes?

12:13:17 17 A Yes.

12:14:05 18 Q Let's go to Chapter 9. Caekaert/Mapely
12:14:07 19 1410. This is expenses and reimbursements. I want
12:14:19 20 to go to paragraph two. "Circuit overseers may
12:14:22 21 submit for reimbursement general weekly expenses
12:14:25 22 including some food expenses, office expenses,
12:14:28 23 transportation, certain moderate personal expenses."

12:14:33 24 Was that the case when you were a circuit
12:14:35 25 overseer in the 1970s, Mr. Lovett?

12:14:39 1 A Yes. They let you do that, Uh-huh.

12:14:42 2 Q Okay. If we go to the next page, this is

12:14:58 3 Bates number 1411. There's a procedure for

12:15:07 4 submitting expenses.

12:15:16 5 A Uh-huh.

12:15:21 6 Q It basically says "You need an itemized

12:15:24 7 list of expenses together with the receipts."

12:15:27 8 Is that -- was that the procedure when you

12:15:28 9 were a circuit overseer in the 1970s?

12:15:32 10 A Yeah.

12:15:37 11 Q Go to the next page 1412. Personal

12:15:42 12 expense account. "It's a personal expense account

12:15:45 13 is made available to those in special full-time

12:15:48 14 service."

12:15:49 15 First of all, what is special full-time

12:15:51 16 service?

12:15:55 17 A Well, we to do with us, we generally be a

12:15:59 18 Bethalizer or special pioneers or missionaries and

12:16:07 19 things as opposed to just being a -- a publisher,

12:16:10 20 you know, and -- let's see not and regular pioneers

12:16:15 21 weren't included there either. They may be now but

12:16:18 22 I don't know.

12:16:19 23 Q Is a circuit overseer a special full

12:16:22 24 title?

12:16:23 25 A Yes.

12:16:24 1
12:16:25 2
12:16:26 3
12:16:28 4
12:16:31 5
12:16:32 6
12:16:35 7
12:16:43 8
12:16:45 9
12:16:47 10
12:16:53 11
12:16:53 12
12:17:02 13
12:17:06 14
12:17:10 15
12:17:13 16
12:17:13 17
12:17:13 18
12:17:18 19
12:17:20 20
12:17:27 21
12:17:32 22
12:17:35 23
12:17:39 24
12:17:44 25

Q Okay.

A Yes.

Q Did you have a personal expense account when you were a circuit overseer?

A Yes.

Q It was -- it was limited, you know. They would credit you so much, more like three-, four- --

MR. MCCABE: No question pending. Just wait.

THE WITNESS: Okay. 500.

BY MR. SHAFFER:

Q Next page. Bates 1413. Expenses incurred in connection with conventions. "A circuit overseer are signed by the branch office to serve as a convention chairman."

First of all, do you ever serve as a convention chairman?

A No. Convention overseer but not chairman.

Q Okay. This -- if we go down further right kind of paragraph 20 talks about expenses incurred moving to a new assignment as a circuit overseer. Did you ever get moving expenses covered from moving to a new circuit?

A Where did it say newer? Generally that

14:50:40 1 A Yes.

14:50:41 2 Q Are Bethelites people in the branch
14:50:44 3 office?

14:50:45 4 A Yes. I doubt you know the answer to any
14:50:47 5 of those.

14:50:53 6 Q And that's okay. I'm just interested in
14:50:56 7 your answers, I guess. All right.

14:51:01 8 But thank you for helping me understand a
14:51:03 9 little bit.

14:51:04 10 What -- what's the difference in your view
14:51:06 11 between the service department and the branch
14:51:08 12 office?

14:51:11 13 A Rephrase that, what?

14:51:12 14 Q In your mind, what's the difference
14:51:14 15 between the service department and the branch
14:51:17 16 office?

14:51:17 17 A Well, the service department as I
14:51:20 18 understand is part of the -- the branch.

14:51:26 19 Q Okay.

14:51:27 20 A It's a department there.

14:51:29 21 Q And then what's the difference between the
14:51:30 22 branch and like Watch Tower corporations, in your
14:51:34 23 view?

14:51:35 24 A Well, one, the corporation, the legal
14:51:37 25 means by which they do these things. And the branch

14:51:42 1 is mainly dealing with our country or a country.

14:51:44 2 Q Okay. And does the branch have like
14:51:47 3 letterhead and stuff? Does it say Jehovah's Witness
14:51:51 4 branch office?

14:51:52 5 A I think they -- I think it does go into
14:51:55 6 the branch now. But the Watch Tower was the heading
14:51:59 7 for years. And then now this is viewed as a branch
14:52:04 8 then they -- they can mention that. I don't -- You
14:52:07 9 know, I don't actually know what their letterhead is
14:52:11 10 at this time.

14:52:12 11 Q When you were getting reimbursement
14:52:14 12 checks, were those coming on Watch Tower checks?

14:52:18 13 A They actually I think were just credited
14:52:22 14 to our -- our account so to speak.

14:52:25 15 Q What does that mean?

14:52:27 16 A Where they would give you credit and then
14:52:30 17 you could request that, basically.

14:52:34 18 Q How would they pay?

14:52:36 19 A Well they would -- they would give you a
14:52:40 20 credit there at the branch itself if you wanted
14:52:42 21 to (unintelligible). They have a little store there
14:52:47 22 for groceries and things for the Bethelites.

14:52:52 23 Q When you were circuit overseeing you were
14:52:54 24 getting reimbursed for gas on your allowance, which
14:52:58 25 you said wasn't much. Would you get a check or