

Exhibit A

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

TRACY CAEKAERT and CAMILLIA MAPLEY,
PLAINTIFFS,

- against -

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

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

DEFENDANTS.

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

PLAINTIFFS,

- against -

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

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

DEFENDANTS.

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DATE: December 5, 2023

TIME: 9:21 A.M.

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

1 G. BREAUX

2 Q. -- picking up your Bible.

3 A. Yeah. I have the Bible. I'd
4 like to explain my position as an
5 individual is based on Isaiah 43 and verse
6 10, and that's really -- this is -- this is
7 the way I feel. This says, "You are my
8 witnesses, declares Jehovah."

9 MR. STEPANS: I have to object
10 as nonresponsive.

11 Q. But please go forward.

12 A. "Yes, my servant, whom I have
13 chosen so you may know and have faith in
14 me."

15 So I'm one of Jehovah's
16 Witnesses. I'm a witness of Jehovah.
17 That's who I'm devoted to, that's who I
18 worship, that's who I serve.

19 Q. Okay. And are there any --
20 well, let me -- let me start.

21 When did you become one of
22 Jehovah's Witnesses? That -- let's start
23 with that. That'd be great.

24 A. Let's see. 1956.

25 Q. How old were you?

1 G. BREAUX

2 I -- I am one of Jehovah's Witnesses. I
3 attend a Christian congregation --

4 Q. I see.

5 A. -- which is Fostertown.

6 Q. Do you hold any positions --
7 well, let me ask you this. I -- are you
8 familiar with the Watchtower Bible and
9 Tract Society of New York?

10 A. Yes.

11 Q. What is that?

12 A. A legal entity.

13 Q. Embellish upon that. What does
14 that mean?

15 A. I'm not in a position, really,
16 to respond to that.

17 Q. Okay. Do you know what they
18 do? Do you know what that entity does?

19 A. I really don't represent them,
20 and I -- I really haven't prepared myself
21 to answer what they're involved in.

22 Q. I'm asking based on your
23 personal knowledge. That's what you're
24 here to do today.

25 Do you have an understanding of

1 G. BREAUX

2 what Watchtower Bible and Tract Society of
3 New York does?

4 A. As I sit here now, no. Not
5 completely.

6 Q. And when you say not
7 completely, I'm asking if you have any idea
8 what that organization does.

9 A. No. I don't remember.

10 Q. How about Watch Tower Bible and
11 Tract Society of Pennsylvania? Is that an
12 entity you're familiar with?

13 A. It's a legal entity.

14 Q. Okay. What -- and do you have
15 any knowledge of what that entity does?

16 A. I just know they're
17 international.

18 Q. Is that the only thing that you
19 know about them?

20 A. That's really all I know.

21 Q. Okay. How about the Christian
22 Congregation of Jehovah's Witnesses? Is
23 that a term you're familiar with?

24 A. It's a legal entity.

25 Q. Okay. And are you familiar

1 G. BREAUX

2 with what they do?

3 A. I'm not in a position to
4 explain the Christian Congregation of
5 Jehovah's Witnesses.

6 Q. And why is that?

7 A. I'm not representing them. I'm
8 representing myself.

9 Q. And I'm sorry. I -- I feel
10 like you might be a little bit confused
11 about the way I'm asking these questions,
12 so let me clarify.

13 Any question I'm asking you is
14 based on your personal knowledge. I'm not
15 asking you to represent anyone else because
16 that's not what you're here to do. Your
17 personal knowledge is what we're here to
18 understand.

19 And so when I ask you a
20 question, it is based upon your personal
21 knowledge. I'm not asking for you to
22 represent any other entity. Do you
23 understand that?

24 A. Would you make that clear every
25 time you ask me a question?

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G. BREAU

MR. STEPANS: Strike that.

MS. KORBEL: -- to the form.

MR. STEPANS: Strike it.

Strike it.

Q. What does a congregation elder do?

A. Well, I can tell you what I do as an elder. I can't talk about all the congregation elders.

Q. Once again, just please, based upon your personal knowledge and your experience, tell me.

So once again, what did you do as an elder?

A. Okay. Thank you.

As an elder, I -- I go from door to door. I -- I -- I take active part in preaching the good news. I prepare talks for our congregation meetings. I give spiritual advice to those that are asking, take care of humanitarian needs of those that are in need.

Q. How long were you a congregation elder?

1 G. BREAUX

2 A. I believe since 1972.

3 Q. Until the present?

4 A. Yes.

5 Q. What congregation did you first
6 become an elder in?

7 A. Riverview Gardens Congregation,
8 St. Louis, Missouri.

9 Q. How did you come to be an
10 elder?

11 A. Well, as I recall, the other
12 men in the congregation met and made a
13 recommendation, and my name was
14 appointed -- my name was announced as a
15 congregation elder. So I wasn't involved
16 in that process, but that's what I recall.

17 Q. Have you ever been involved in
18 that process for others when appointing
19 elders?

20 A. When I was in -- yes. I have
21 as an elder in a congregation.

22 Q. Tell me about that process --

23 A. Okay.

24 Q. -- from that end of it.

25 A. Okay. I follow the scriptural

1 G. BREAUX

2 appoint myself. I -- I -- I do not know.

3 Q. Do you remember how you got
4 word that you were a circuit overseer?

5 A. I do not remember. It's been
6 too many years ago.

7 Q. Who did you answer to as a
8 circuit overseer? Who did you report to?

9 A. Can you explain your question?
10 Report?

11 Q. If I understood correctly, you
12 said you traveled around to various
13 congregations providing information,
14 gathering information. To whom did you
15 share the information that you gathered
16 from the congregations?

17 MS. KORFUL: Objection to the
18 form.

19 A. I -- I sent reports to service
20 department.

21 Q. What's the service department?

22 A. It's a group of -- no. I --
23 I -- I -- I don't know. I'm not here,
24 really, to explain to you what the service
25 department's all about.

1 G. BREAUX

2 Q. Do you have an understanding,
3 based on your personal knowledge, of what
4 the service department does?

5 A. Yes. I...

6 Q. Please go ahead, then.

7 A. I do. From my perspective,
8 it's a group of volunteers that oversee the
9 preaching work, that give recommendations
10 to how to handle the preaching in the
11 congregations.

12 Q. Anything else?

13 A. No. I don't remember anything
14 else at this moment.

15 Q. Okay. So what you -- the
16 answer you just gave, that is the extent of
17 your personal knowledge about what the
18 service department does. Is that right?

19 A. Other than what my own
20 assignment is, yes.

21 Q. Are you currently on the
22 service department, a member of it?

23 A. Yes, I am.

24 Q. What's your -- do you have a
25 title?

1 G. BREAUX

2 countries.

3 Q. And is that a legal entity?

4 A. No.

5 Q. And do you have an
6 understanding of, based on your person
7 knowledge, what the U.S. Branch Committee
8 does?

9 A. I don't know. Limited
10 knowledge.

11 Q. Please.

12 A. They -- some individuals will
13 care for the health of the Bethel family;
14 that's basically care for the buildings.

15 Q. And what do you mean by care
16 for the buildings?

17 A. Well --

18 Q. Physically take care of them?

19 A. Yes.

20 Q. The U.S. Branch Committee --
21 people who are on the U.S. Branch Committee
22 fix the buildings?

23 A. Yeah. Well, I -- I don't --
24 I -- yeah. I don't know. They -- they
25 don't personally fix the buildings, but

1 G. BREAUX

2 they have teams that do it.

3 Q. So it sounds like they have
4 decision-making authority about spending
5 money to fix the buildings?

6 A. Well, I -- I -- I don't know.
7 I don't know. I'm not experienced in that.
8 I'm not going to go into that area.

9 Q. All right. Anything else that
10 you have person knowledge about what the
11 U.S. Branch Committee does?

12 A. No, I don't.

13 Q. And do you know -- do you have
14 an understanding of to whom the U.S. Branch
15 Committee reports?

16 A. No, I don't.

17 Q. Do you know if they report to
18 the Governing Body?

19 A. No, I don't. I don't know if
20 they report to the Governing Body.

21 Q. Do you have an understanding
22 whether the Governing Body has authority
23 over the Branch Committee?

24 A. No, I do not.

25 Q. Is it your understanding,

1 G. BREAUX

2 your appointment as a circuit overseer the
3 first time. That's kind of what got us
4 into this, so I'll bring us back there.

5 I think you indicated -- I
6 believe you indicated that you don't know
7 how you were appointed as a circuit
8 overseer. Is that right?

9 A. That's correct.

10 Q. Okay. Now, in your role as the
11 overseer of the service department, do you
12 have any understanding of how circuit
13 overseers are appointed?

14 MS. KORFUL: You want us to
15 close the door?

16 MR. STEPANS: Yeah.

17 A. Yeah. I -- I do not know. I'm
18 not prepared to explain all of -- that's
19 not...

20 Q. And I -- once again here, this
21 is based on your personal knowledge. So
22 please, if you can, just answer based upon
23 that.

24 A. No. I -- I -- I don't know.

25 Q. Is the service department

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G. BREAU

involved in appointing circuit overseers in any way?

A. I'm not here representing service department, so I -- I don't know.

Q. And once again, I'm not asking you questions as a representative of that.

A. Okay.

Q. I'm asking about your personal knowledge. So do you have any personal knowledge of the role of the service department, if any, in appointing circuit overseers?

A. I don't know.

Q. Do you remember when you were first appointed as a circuit overseer, approximately?

A. 1986, as I recall.

Q. All right. And for how long were you in that role at that time, approximately?

A. Wait. I -- I didn't answer correctly. Can you ask the question again?

MS. KORFUL: You could correct it if --

1 G. BREAUX

2 A. Thank you.

3 Q. Of course.

4 A. Yeah. I was first appointed in
5 1975. I apologize for that.

6 Q. Not at all.

7 And do you know how long you
8 were in that role at that time?

9 A. Yeah. That's what I was
10 counting. Till 1981, as I recall.

11 Q. And then appointed again in
12 1986?

13 A. That's correct.

14 Q. So that would be the second
15 time that --

16 A. That's correct.

17 Q. -- you were appointed.

18 And do you recall how long you
19 were in the role of circuit overseer the
20 second time starting in 1986,
21 approximately?

22 A. Yeah. Till February 1994.

23 Q. Where were you living -- let's
24 go -- let's go to the 1975 to '81 circuit
25 overseer time.

1 G. BREAUX

2 Q. And have you been there ever
3 since?

4 A. Yes.

5 Q. All right. What was your role
6 when you first went to Bethel? Did you
7 have a title?

8 A. Was an elder in the
9 congregation; and in the Bethel
10 environment, I worked as -- I was assigned
11 as a service desk -- desk man in service
12 department.

13 Q. And how long were you a desk
14 man in the service department?

15 A. I don't know.

16 Q. Can you approximate? Ten
17 years?

18 A. 2004, probably less.

19 Q. And talk to me a little bit
20 about that role. What did you do?
21 What's -- what's a desk man?

22 A. Yeah. I'm not going to go
23 into -- that's -- let -- let a
24 representative of service department
25 explain what a desk man does.

1 G. BREAUX

2 A. Yeah. That's correct.

3 Q. Or actually, I should say when,
4 in 1994, the service desk was within the
5 service department. Is that right?

6 A. Yes.

7 Q. And do you know if that changed
8 at any point in time?

9 A. Not to my knowledge.

10 Q. What sorts of things would
11 people call about?

12 MS. KORFUL: Well, I will
13 object to identifying specific people
14 with specific issues based on
15 confidentiality and privilege. In
16 general, you can answer.

17 A. Bible questions.

18 Q. Anything else?

19 A. I don't remember beyond that.

20 Q. And do you have a personal
21 understanding of what the -- how the role
22 of desk man is defined?

23 A. I'm not in a position to
24 explain purpose of a desk man.

25 Q. You don't --

1 G. BREAUX

2 A. Service desk.

3 Q. I'm sorry. You don't have any
4 knowledge about what -- what a desk man
5 does?

6 A. You know, I -- I -- let someone
7 else explain to you the workings of a
8 service desk.

9 Q. Certainly, I'm asking just
10 about your personal knowledge, so maybe --
11 did you have an understanding of what you
12 were supposed to do as a desk man?

13 A. Yes. As I said, I answered
14 phones, I answered questions. Individuals
15 had questions, Bible questions, how to
16 handle their lives, how to handle
17 situations, and that's -- that was the
18 role.

19 Q. And how -- what I'm asking is
20 how did you come to understand what
21 comprised that role? That is my question.

22 A. Well --

23 Q. You personally.

24 A. I was brought into Bethel, put
25 at a desk and started answering phone

1 G. BREAUX

2 roles? I want to get back to a little bit
3 more discussion of your role at the service
4 desk.

5 But since you've been in
6 Bethel, in addition to being on the U.S.
7 Branch Committee as a voting member, are
8 there any other positions that you have
9 held there at Bethel?

10 I'm sorry. I should clarify.
11 You also indicated you were overseer of the
12 service department. Is that right?

13 A. Correct.

14 Q. Okay. So we have U.S. Branch
15 Committee and the overseer of the service
16 department. I don't want to retread that.
17 Anything other than those?

18 A. A helper.

19 Q. What's a helper?

20 A. Helper to the Governing Body.

21 Q. And what does that mean? What
22 do you do in that role?

23 A. I'll speak about just myself.
24 That's what our understanding is. I
25 can't --

1 G. BREAUX

2 Q. Yes.

3 A. -- talk about anybody else's
4 role. But I -- I take you back to the
5 Bible, if you give me opportunity to --
6 here's my understanding of the basis.

7 Q. And if I could, I would -- I
8 would very much prefer to understand your
9 answer, and if you'd like to give me the
10 basis, that's fine. But before we get into
11 the basis of your answer, if you could just
12 answer the question.

13 A. The -- yes. The -- the name
14 explains itself, help the Governing Body.

15 Q. With what?

16 A. With -- for me, it's
17 disasters -- disaster relief, humanitarian
18 needs and preaching campaigns in other --
19 other countries.

20 Q. Do you help -- do you help by
21 actually going and doing those yourself,
22 going and preaching, or is it some other
23 function that you're serving as a helper to
24 assist the Governing Body with those tasks?

25 A. Sometimes it's physically

1 G. BREAUX

2 Q. And so if we clarify, is that
3 the Watchtower Bible and Tract Society of
4 New York?

5 A. Yes.

6 Q. How long have you been a voting
7 member?

8 A. I do not know.

9 Q. Approximately --

10 A. I don't remember.

11 Q. -- more than 10 years?

12 A. '23, '13. I do not remember
13 really.

14 Q. What sorts of -- are you a
15 voting member of CCJW?

16 A. Yes.

17 Q. How about Watch Tower Bible and
18 Tract Society of Pennsylvania? Have you
19 held any role with them?

20 A. A voting member.

21 Q. And are you currently a voting
22 member of --

23 A. Yes, I am.

24 Q. Okay. And I appreciate you
25 drawing the distinction. So on the legal

1 G. BREAUX

2 side, other than being a voting member of
3 CCJW, a voting member of Watchtower Bible
4 and Tract Society of New York and a voting
5 member of Watch Tower Bible and Tract
6 Society of Pennsylvania, do you hold any
7 other roles?

8 A. Vice president in CCJW.

9 Q. How long have you been in that
10 role, approximately?

11 A. I don't know. More than five
12 years.

13 Q. Any other roles?

14 A. No.

15 Q. I wanted to go back, just very
16 briefly, to the service desk appointment
17 that you were describing. Are you with me?

18 Earlier, you're -- you were
19 appointed in '94 to be a desk man in the
20 service department. Is that right?

21 A. Yes.

22 Q. Were you responsible for any
23 specific geographic regions? Like, would
24 you field calls from particular areas?

25 A. Yes.

1 G. BREAUX

2 A. No, I cannot.

3 Q. Do you have an understanding of
4 the relationship between CCJW and the
5 service department?

6 A. One is a legal entity, and the
7 other cares for the -- the spiritual needs.

8 Q. And which is which?

9 A. The legal corporation is a
10 legal corporation.

11 Q. Which is what? That's what I'm
12 asking. The service department?

13 A. No. Service department is not
14 a legal entity.

15 Q. So CCJW is the legal entity.
16 Is that right?

17 A. That is correct.

18 Q. And what is your understanding
19 as the overseer of the service department
20 and the vice president of CCJW of what the
21 relationship is, if any, between the
22 service department and CCJW?

23 A. Yeah. I'm not in a position,
24 really, to answer that.

25 Q. I'm asking based on your

1 G. BREAUX

2 wanted to clarify with you. I -- you were
3 talking about your role with Watchtower
4 Bible and Tract Society of New York before
5 the noon break.

6 A. Yeah.

7 Q. And could you identify all of
8 the roles that you hold within Watchtower
9 Bible and Tract Society of New York?

10 MS. KORFUL: You mean currently
11 or...

12 MR. STEPANS: Correct.

13 A. Currently, a voting member.

14 Q. Okay. At any point in time,
15 have you held other positions within
16 Watchtower Bible and Tract Society of New
17 York?

18 A. Yes.

19 Q. And what were those roles?

20 A. Assistant secretary treasury,
21 as I recall.

22 Q. All right. And assistant
23 secretary and assistant treasurer or is
24 that --

25 A. No.

1 G. BREAUX

2 Service -- or excuse me. WTPNY?

3 A. Yes.

4 Q. And the Branch Committee? U.S.
5 Branch Committee?

6 A. It's not a legal entity.

7 Q. And so what are you -- what are
8 a voting member of then? Do they make
9 decisions? Does the U.S. Branch Committee
10 make decisions?

11 A. Yes. You were talking about
12 legal --

13 MR. TAYLOR: Excuse me.

14 A. -- so I separated those two.

15 Q. Legal?

16 A. Yeah. The legal entities, yes.
17 I was board member in the legal entities,
18 and I voted.

19 Q. And it sounds like you were
20 also a board member of WTP -- or excuse
21 me -- of the U.S. Branch Committee. Is
22 that right?

23 A. Yes. I -- I'm a member of the
24 Branch Committee.

25 Q. And are you a voting member?

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G. BREAU

it as a legal entity? Do you understand it as that?

A. No.

Q. What's your understanding of what -- what it is?

A. Group of anointed elders that work as -- as a -- as a team as the Governing Body.

Q. And so the meetings with them, are they strictly about -- about -- with the service committee, are those meetings strictly about practical and logistical considerations that you've identified or do you discuss religious matters with them in those meetings as well?

MR. TAYLOR: Just objection to the form.

A. We discuss the Bible, if that's what you're asking.

Q. Do you discuss policies and procedures?

MS. KORFUL: Objection to the form.

A. We discuss what would be

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G. BREAU

helpful to the field; what kind of problems are -- are they dealing with; what are the stresses in life; how can we help; where can we send missionaries to assist; how can we send other individuals that are available to go and support local congregations.

Q. Do you discuss policies?

MS. KORFUL: Objection to the form.

A. In my knowledge, in my understanding, there are no policies.

Q. Do you discuss procedures?

MS. KORFUL: Objection to the form.

A. We discuss counsel, suggestions that could be made. We discuss advice that would be helpful.

Q. How is that agenda set --

A. I don't know.

Q. -- week to week?

A. I don't know.

Q. Do you set it?

A. I do not.

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G. BREAUX

man.

Q. How about before that?

A. No. I have no information.

Q. Have you ever had any information about the handling of child sex abuse claims?

A. Ever?

Q. Yes.

A. Currently, I have some information.

Q. And what is that?

A. I think someone else should explain to you service department procedures. I'm not here representing service department. I'm here representing myself.

Q. And do you have any knowledge, personally, about the handling of child sex abuse reports in the 1970s?

A. No, I do not.

Q. Did you at any point in time?

A. I do not remember.

Q. Do you remember giving a deposition where you had been identified as

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G. BREAU

know that you didn't have any
responsibility?

A. When I was trained.

Q. Was it specifically exempted
from your training?

A. No.

Q. Were there other things that
you had no responsibility for as a circuit
overseer?

A. It was explained to me by the
trainer that circuit overseers don't get
involved in judicial matters. So we take
the lead in preaching. If there are
questions, they can give guidance on the
scriptures.

Q. And you mentioned a judicial
committee. What is that?

A. I'm not here to explain how a
congregation functions. Someone else would
be better qualified for that.

Q. Based on your personal
knowledge, please go ahead and answer, if
you can.

A. The congregation that I attend,

1 G. BREAUX

2 MR. TAYLOR: Objection to the
3 form.

4 Q. Go ahead.

5 A. No. I'm not going to answer
6 for the organization.

7 Q. I'm asking if you have an
8 understanding.

9 A. I don't know. Depending on the
10 circumstances.

11 Q. Let me go back, actually, to
12 the question that I just asked. You
13 indicated that you would refer the elders
14 to legal if they were asking a question
15 about mandatory reporting.

16 How did you know to refer them
17 to legal? That -- that was my question.

18 A. Romans 13:1 says to be obedient
19 to the authorities. So who knows what the
20 local authorities are requiring? The
21 attorneys know, so they could do the
22 research and -- and provide the information
23 to the elders.

24 Q. In your role as a desk man at
25 the service desk, did you understand that

1 G. BREAUX

2 right now?

3 A. No.

4 Q. And the reason I'm asking this
5 is 'cause I was looking at some of your
6 prior deposition testimony, and I -- well,
7 anyway, I'll come back to that.

8 Have you ever been to Montana,
9 the State of Montana?

10 A. Yes.

11 Q. And what were you doing there?

12 A. Vacations.

13 Q. Have you ever been to Montana
14 for work?

15 A. A convention.

16 Q. Where was that?

17 A. I don't remember. Capital of
18 Montana, one of the big cities. I don't
19 remember what it was.

20 Q. And did you ever travel to
21 Montana as a circuit overseer?

22 A. Not in -- not in a circuit.
23 They didn't have a circuit in Montana.

24 Q. Okay. But did you travel there
25 when you were a circuit overseer?

1 G. BREAUX

2 A. I did.

3 Q. And was that part of your
4 territory?

5 A. At that time, there was --
6 there was -- I don't remember. On the
7 eastern -- the eastern part of Montana was
8 part of the North Dakota circuit.

9 Q. And so that was part of your
10 responsibility as well, eastern Montana?

11 A. Yeah. It was, I think, two
12 small congregations around the border.

13 Q. Okay. So we can add Montana to
14 the -- to the list of states that you were
15 a circuit overseer for?

16 A. I wasn't a circuit overseer for
17 a circuit in Montana. I was a circuit
18 overseer for North Dakota, so I never
19 served Montana as a circuit overseer.

20 Q. But you traveled to Montana to
21 visit congregations as a circuit overseer.
22 If I understand correctly, these are
23 congregations geographically located within
24 the State of Montana as it is recognized by
25 the United States.

1 G. BREAUX

2 But you're making a distinction
3 between that and the circuit that you were
4 responsible for, which you're describing as
5 North Dakota and apparently some portion of
6 Montana was part of the North Dakota
7 circuit. Is that right?

8 A. Yes.

9 Q. And were you responsible for
10 that circuit both times that you were a
11 circuit overseer?

12 A. No. No.

13 Q. Was it -- which of the blocks
14 that you've identified? The earlier or the
15 later?

16 A. Earlier.

17 Q. And so if I understand your
18 testimony correctly, that was starting in
19 1970 --

20 MS. KORGUL: 5.

21 Q. -- 5 --

22 A. Yes.

23 Q. -- through '81. Is that right?

24 A. Not in North Dakota. I started
25 in '75 in North Dakota.