

***Exhibit N***

1 **WATCHTOWER BIBLE AND TRACT**  
2 **SOCIETY OF NEW YORK, INC.**  
3 **LEGAL DEPARTMENT**

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7  
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN DIEGO**

10 JOHN DORMAN, Individually, and JOEL  
11 GAMBOA, Individually,

11 Plaintiffs,

12 v.

13 DEFENDANT DOE 1, La Jolla Church,  
14 DEFENDANT DOE 2, Linda Vista Church,  
15 and DEFENDANT DOE 3, Supervisory  
16 Organization, DEFENDANT DOE 4,  
17 Perpetrator, and DOES 5 through 100,  
18 inclusive,

18 Defendants.

Case No.: 37-2010-00092450-CU-PO-CTL

**AFFIDAVIT OF ALLEN SHUSTER**

19  
20 I, Allen Shuster, after being duly sworn, depose and state that if called to testify in this  
21 matter I would competently testify as follows:

22 1. I am over 21 years of age, of sound mind, and competent to make this Affidavit.

23 I have personal knowledge of the matters contained herein, and they are all true and correct.

24 2. I reside in Patterson, New York, and have served as an elder in the faith of  
25 Jehovah's Witnesses since about 1979.



1           10.    Individuals spend as much time in the public ministry as their heart motivates  
2 them to do so.

3           11.    There is no requirement for publishers to place certain amounts of literature.

4           12.    Before an individual, whether a man, woman, or child, is recognized as an  
5 unbaptized publisher, two congregation Elders briefly meet with that person (and their parents  
6 in the case of a minor) to determine whether the individual believes the Bible is the inspired  
7 Word of God, whether the person knows basic Bible teachings, whether their life is in harmony  
8 with the Bible's prohibitions against immorality, drunkenness, and drug abuse, and whether they  
9 want to be one of Jehovah's Witnesses. Thereafter, the two Elders who meet with the individual  
10 determine whether the individual qualifies to be recognized as an unbaptized publisher in the  
11 congregation.  
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13           13.    However, this procedure for becoming an unbaptized publisher did not come into  
14 existence until it was announced in the November 15, 1988, issue of *The Watchtower*. Prior to  
15 the publishing of *The Watchtower* of November 15, 1988, the individual publisher who studied  
16 the Bible with an interested person made the decision as to when that interested person could be  
17 invited to accompany the congregation in the field ministry as an approved associate of  
18 Jehovah's Witnesses.  
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20           14.    There is no application form to fill out to become an unbaptized publisher.  
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22           15.    Neither Watchtower nor the U.S. branch offices of Jehovah's Witnesses review  
23 or approve whether an individual is recognized as an unbaptized or baptized publisher, nor do  
24 Watchtower or the U.S. branch offices of Jehovah's Witnesses maintain a list of unbaptized or  
25 baptized publishers in a given congregation. Likewise, prior to November 15, 1988, neither  
26 Watchtower nor the U.S. branch offices of Jehovah's Witnesses reviewed or approved whether  
27

1 an individual could be an approved associate of Jehovah's Witnesses, and neither did they  
2 maintain a list of approved associates in a given congregation.

3 16. After the person turns in his or her first field service report to the Elders, an  
4 announcement is made during one of the weekday congregation meetings that so-and-so is a  
5 new unbaptized publisher in the congregation. The procedure to announce a new unbaptized  
6 publisher to the congregation did not come into existence until it was announced in the  
7 November 15, 1988, issue of *The Watchtower*. Prior to that date there was no announcement  
8 made when an individual became an approved associate.  
9

10 17. Before an individual can serve as an Elder, Ministerial Servant, and/or Regular or  
11 Auxiliary Pioneer, they must be a baptized publisher. Most baptized publishers do not serve in  
12 an appointed position as Elders, Ministerial Servants, and/or Regular Pioneers.  
13

14 18. There is no paid clergy class at Watchtower, the U.S. branch offices of Jehovah's  
15 Witnesses, or in congregations of Jehovah's Witnesses.

16 19. Each congregation is supervised by a group of men, in many cases three or more,  
17 who are referred to as "Elders."  
18

19 20. These Elders take the lead in teaching, providing pastoral care, and organizing  
20 the congregations. Most Elders are also husbands and fathers, and most are secularly employed  
21 to support their families. These men are unpaid volunteers and they do not wear any priestly  
22 garb or special identifying clothing.

23 21. Each congregation of Jehovah's Witnesses, including the Linda Vista Spanish  
24 Congregation and the La Jolla Spanish Congregation (now called Playa Pacifica Spanish  
25 Congregation), has its own individual group of Elders known as a "body of elders" for their  
26 separate congregation.  
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1           22. Each congregation has three different Elders serving in three separate positions  
2 known as “Coordinator of the Body of Elders” (previously called “Presiding Overseer”),  
3 “Secretary,” and “Service Overseer.”

4           23. The “Coordinator of the Body of Elders” serves as the chairman at meetings of  
5 the Elders and directly coordinates certain congregation activities in behalf of the elders.

6           24. The Secretary maintains field service reports (record of individual’s field service  
7 activity) and other congregation records.

8           25. The Service Overseer monitors the public ministry of congregation members as a  
9 whole, which is sometimes also referred to as “field ministry” or “field service.”

10           26. These three Elders (Coordinator of the Body of Elders, Secretary, and Service  
11 Overseer) constitute a “Congregation Service Committee” to care for some matters on behalf of  
12 the body of elders, such as the composition and location of Congregation Book Studies, and  
13 communications with Watchtower, the U.S. branch offices of Jehovah’s Witnesses, and other  
14 congregations.  
15

16           27. Other Elders in the congregation serve as a Theocratic Ministry School Overseer  
17 and a *Watchtower* Study Conductor. During the 1970’s through the 1990’s other Elders also  
18 served as Congregation Book Study Overseers.  
19

20           28. The Theocratic Ministry School Overseer is responsible for organizing and  
21 instructing a weekly midweek meeting entitled the Theocratic Ministry School.  
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23           29. The *Watchtower* Study Conductor organizes and oversees a weekly one-hour  
24 meeting that takes place on the weekends (usually Sunday) during which an article from the  
25 *Watchtower* magazine is considered.  
26

27           30. Both the Theocratic Ministry School and the *Watchtower* Study meetings are  
28 held at the Kingdom Hall and are open to all congregation members and to the public.

1           31.     During the 1970's through the 1990's the Congregation Book Study Overseers  
2 organized and oversaw a second weekly one-hour meeting of separate small groups that  
3 generally met in the private homes of some of the congregation members to study a Bible-based  
4 publication published by Jehovah's Witnesses.

5           32.     Each congregation also has "Ministerial Servants" who are appointed to assist the  
6 Elders to care for the practical needs of the congregations.

7  
8           33.     The responsibilities of Ministerial Servants include handling the congregation  
9 literature, congregation accounts, and congregation territory for the public ministry, caring for  
10 microphone and sound equipment during meetings, serving as attendants during congregation  
11 meetings, and maintaining the physical appearance and cleanliness of the Kingdom Hall.

12           34.     Congregations also have "Regular Pioneers" and "Auxiliary Pioneers" who can  
13 be men, women, or young people who are active in the public ministry.

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15           35.     During the 1970's through the 1990's, Regular Pioneers had to average 100  
16 hours per month in the public ministry and then later had to average 90 hours a month.  
17 Beginning in 1976, Auxiliary Pioneers had a 60 hours per month average. Currently, Regular  
18 Pioneers have to average 70 hours per month in the public ministry and Auxiliary Pioneers have  
19 to average 50 hours per month.

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21           36.     Those who serve in the capacity of Elders, Ministerial Servants, and Regular or  
22 Auxiliary Pioneers are all volunteers and none of them are paid for their service nor do they  
23 receive any reimbursement for their transportation, living, or meal expenses.

24           37.     Neither Watchtower, the U.S. branch offices of Jehovah's Witnesses, nor any  
25 congregations of Jehovah's Witnesses have any paid employees, and as previously noted, there  
26 is no paid clergy class.  
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**APPOINTMENTS OF ELDERS, MINISTERIAL SERVANTS, AND PIONEERS**

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2 38. At least twice a year, the body of elders of a congregation meets together to  
3 review the qualifications of the men in the congregation who might qualify to serve as an Elder  
4 or Ministerial Servant.

5 39. Elders are recommended from among the Ministerial Servants in the  
6 congregation and must meet the spiritual qualifications found at 1 Timothy 3:1-7 and Titus 1:5-  
7  
8 9.

9 40. Ministerial Servants are recommended from other male members of the  
10 congregation who are not serving as an Elder or Ministerial Servant and who meet the spiritual  
11 qualifications found at 1 Timothy 3:8-10, 12, 13.

12 41. A "Regular Pioneer" or "Auxiliary Pioneer," on the other hand, is a position that  
13 any congregation member can apply for by filling out an application and turning it in to the  
14 Congregation Service Committee.

15 42. The Congregation Service Committee reviews the application to determine,  
16 among other factors, whether the individual meets the spiritual and moral requirements and is  
17 likely to meet the monthly time requirement to serve as a Regular or Auxiliary Pioneer.  
18

19 43. During the 1970's through the 1990's, the local congregation Elders'  
20 recommendations of Elders, Ministerial Servants, and Regular Pioneers had to be approved by  
21 the Service Department at the U.S. branch offices of Jehovah's Witnesses in New York before  
22 they could be appointed. However, Auxiliary Pioneers were approved by the local  
23 Congregation Service Committee without any review or approval by the Service Department at  
24 the U.S. branch offices.  
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1           44.     During the 1970's through the 1990's, all appointments of Elders, Ministerial  
2 Servants, and Regular Pioneers in the United States were communicated by the Service  
3 Department to congregations through Watchtower.

4           45.     After the local congregation body of elders received the approval from  
5 Watchtower for an appointment, an announcement was made to the congregation during one of  
6 the regularly scheduled weekday meetings that the individual was appointed to serve as an  
7 Elder, Ministerial Servant, or Regular Pioneer. A similar announcement is made after a  
8 publisher is approved as an Auxiliary Pioneer by the local Congregation Service Committee.  
9

10          46.     Based on my review of the records of the Service Department of the U.S. branch  
11 offices of Jehovah's Witnesses, which approves appointments of Elders and Ministerial  
12 Servants, it was not until December 22, 1988, that Gonzalo Campos was first appointed to serve  
13 as a Ministerial Servant in the La Jolla Spanish Congregation of Jehovah's Witnesses, San  
14 Diego, California. Gonzalo Campos was never appointed to serve as a Ministerial Servant in  
15 the Linda Vista Spanish Congregation, or in any other congregation of Jehovah's Witnesses,  
16 prior to that date.  
17

18          47.     Based on my review of the records of the Service Department of the U.S. branch  
19 offices of Jehovah's Witnesses, which approves appointments of Elders and Ministerial  
20 Servants, it was not until June 23, 1993, that Gonzalo Campos was appointed to serve as an  
21 Elder in the La Jolla Spanish Congregation of Jehovah's Witnesses, San Diego, California.  
22 Gonzalo Campos was never appointed to serve as an elder in the Linda Vista, Spanish  
23 Congregation, or in any other congregation of Jehovah's Witnesses, prior to that date.  
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Doc 110

California Rules of Court, Rule 3.1350(d), with respect to all of the causes of action in the First Amended Complaint filed by Plaintiffs John Dorman and Joel Gamboa:



**Issue 1: AS TO PLAINTIFF DORMAN'S CAUSES OF ACTION, SUMMARY JUDGMENT IS PROPER BECAUSE DEFENDANT CAMPOS WAS NOT AN AGENT OR EMPLOYEE OF DEFENDANT WATCHTOWER AT THE TIME OF HIS ALLEGED ABUSE OF DORMAN.**

<p>1. All congregations of Jehovah's Witnesses are composed of individuals and families who gather together to worship in buildings called "Kingdom Halls." <i>Affidavit of Allen Shuster, ¶ 5 (Exhibit 1).</i></p>	<p>1.</p>
<p>2. A rank-and-file member of the congregation is called a "publisher." There are baptized and unbaptized publishers, but only baptized publishers are considered to be Jehovah's Witnesses or congregation members. <i>Deposition of Dennis Palmer, p. 49, Ins. 15-22 (Exhibit 2); Deposition of Jesus Montijo, p. 14, Ins. 20-24 (Exhibit 3); Affidavit of Allen Shuster, ¶ 6 (Exhibit 1).</i></p>	<p>2.</p>
<p>3. Jehovah's Witnesses do not practice infant baptism, so their youth are not typically baptized until they are of a sufficient age to make their own determination about their religious beliefs, usually not until their teenage years, but there is no age requirement for baptism. <i>Affidavit of Allen Shuster, ¶ 7 (Exhibit 1).</i></p>	<p>3.</p>
<p>4. Some unbaptized publishers may be as young as five or six years old. <i>Affidavit of Allen Shuster, ¶ 8 (Exhibit 1).</i></p>	<p>4.</p>
<p>5. There is no predetermined amount of hours a publisher is required to spend in the</p>	<p>5.</p>

1	public ministry to qualify as a publisher. <i>Deposition of Justino Diaz</i> , p. 10, Ins. 11-22 (Exhibit 4); <i>Affidavit of Allen Shuster</i> , ¶ 9 (Exhibit 1).	
2		
3	6. Individuals spend as much time in the public ministry as their heart motivates them to do so. <i>Affidavit of Allen Shuster</i> , ¶ 10 (Exhibit 1).	6.
4		
5	7. There is no requirement for publishers to place certain amounts of literature. <i>Affidavit of Allen Shuster</i> , ¶ 11 (Exhibit 1).	7.
6		
7	8. Before an individual, whether a man, woman, or child, can qualify to share in the field ministry with the congregation as an unbaptized publisher, two congregation Elders briefly meet with that person (and their parents in the case of a minor) to determine whether the individual believes the Bible is the inspired Word of God, whether the person knows basic Bible teachings, whether their life is in harmony with the Bible's prohibitions against immorality, drunkenness, and drug abuse, and whether they want to be one of Jehovah's Witnesses. Thereafter, the two Elders who meet with the individual determine whether the individual qualifies to be recognized as an unbaptized publisher in the congregation. <i>Affidavit of Allen Shuster</i> , ¶ 12 (Exhibit 1).	8.
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17	9. However, this procedure for becoming an unbaptized publisher did not come into existence until it was announced in the November 15, 1988, issue of <i>The Watchtower</i> . Prior to November 15, 1988, the individual publisher who studied the Bible with an interested person made the decision as to when that interested person could be invited to accompany the congregation in the field ministry as an approved associate of Jehovah's Witnesses. <i>Affidavit of Allen Shuster</i> , ¶ 13 (Exhibit 1).	9.
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24	10. There is no application form to fill out to become an unbaptized publisher. <i>Affidavit of Allen Shuster</i> , ¶ 14 (Exhibit 1).	10.
25		

<p>1 11. Neither Watchtower nor the U.S. branch                  2 offices of Jehovah’s Witnesses review or                  3 approve whether an individual can be                  4 recognized as an unbaptized or baptized                  5 publisher, nor do Watchtower or the U.S.                  6 branch offices of Jehovah’s Witnesses                  7 maintain a list of unbaptized or baptized                  8 publishers in a given congregation.                  Likewise, prior to November 15, 1988,                  neither Watchtower nor the U.S. branch                  offices of Jehovah’s Witnesses reviewed or                  approved whether an individual could be an                  approved associate of Jehovah’s Witnesses,                  and neither did they maintain a list of                  approved associates in a given congregation.                  9 <b><i>Affidavit of Allen Shuster, ¶ 15 (Exhibit 1).</i></b></p>	<p>11.</p>
<p>10 12. After the person turns in his or her first                  11 field service report to the Elders, an                  12 announcement is made during one of the                  13 weekday congregation meetings that so-and-                  14 so is a new unbaptized publisher in the                  15 congregation. The procedure to announce a                  16 new unbaptized publisher to the congregation                  did not come into existence until it was                  announced in the November 15, 1988, issue                  of <i>The Watchtower</i>, and prior to that date                  there was no announcement made when an                  individual became an approved associate.                  17 <b><i>Affidavit of Allen Shuster, ¶ 16 (Exhibit 1).</i></b></p>	<p>12.</p>
<p>18 13. Before an individual can serve as an                  19 Elder, Ministerial Servant, and/or Regular or                  20 Auxiliary Pioneer, they must be a baptized                  21 publisher. Most baptized publishers do not                  22 serve in an appointed position as Elders,                  23 Ministerial Servants, and/or Regular                  24 Pioneers.                  25 <b><i>Affidavit of Allen Shuster, ¶ 17 (Exhibit 1).</i></b></p>	<p>13.</p>
<p>22 14. Since the number of Watchtower                  23 corporate members range from 30 to 100 at                  24 any given time, and historically have been                  25 Elders who live and serve at the U.S. branch                  offices of Jehovah’s Witnesses in New York,                  most Jehovah’s Witnesses are not corporate                  members of Watchtower.  <b><i>Affidavit of Danny Bland, ¶ 6 (Exhibit 5).</i></b></p>	<p>14.</p>



1	15. There is no paid clergy class in congregations of Jehovah's Witnesses.	15.
2	<i>Affidavit of Allen Shuster, ¶ 18 (Exhibit 1).</i>	
3	16. Each congregation is supervised by a group of men, normally three or more, who are referred to as "Elders."	16.
4	<i>Affidavit of Allen Shuster, ¶ 19 (Exhibit 1).</i>	
5	17. These Elders take the lead in teaching, providing pastoral care, and organizing the congregations. Most Elders are also husbands and fathers, and most are secularly employed to support their families. These men are unpaid volunteers and they do not wear any priestly garb or special identifying clothing.	17.
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9	<i>Affidavit of Allen Shuster, ¶ 20 (Exhibit 1).</i>	
10	18. Each congregation of Jehovah's Witnesses, including the Linda Vista Spanish Congregation and the La Jolla Spanish Congregation (now called Playa Pacifica Spanish Congregation), has its own individual group of Elders known as a "body of elders" for its separate congregation.	18.
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14	<i>Affidavit of Allen Shuster, ¶ 21 (Exhibit 1).</i>	
15	19. Each congregation has three different Elders who serve in their separate positions known as "Coordinator of the Body of Elders" (previously called "Presiding Overseer"), "Secretary," and "Service Overseer."	19.
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18	<i>Affidavit of Allen Shuster, ¶ 22 (Exhibit 1).</i>	
19	20. The "Coordinator of the Body of Elders" serves as the chairman at meetings of the Elders and generally coordinates congregation activities.	20.
20		
21	<i>Affidavit of Allen Shuster, ¶ 23 (Exhibit 1).</i>	
22	21. The Secretary maintains field service reports (record of individual's field service activity) and other congregation records.	21.
23		
24	<i>Affidavit of Allen Shuster, ¶ 24 (Exhibit 1).</i>	
25	22. The Service Overseer monitors the public ministry of the congregation as a whole, which is sometimes also referred to as "field	22.

<p>1 ministry” or “field service.”  <i>Deposition of Dennis Palmer</i>, p. 46, lns. 4-12  (Exhibit 2); <i>Affidavit of Allen Shuster</i>, ¶ 25  (Exhibit 1).</p>	
<p>3 23. These three Elders (Coordinator of the  4 Body of Elders, Secretary, and Service  5 Overseer) constitute a “Congregation Service  6 Committee” to care for some matters on  7 behalf of the body of elders, such as the  8 composition and location of Congregation  9 Book Studies, and communications with  10 Watchtower, the U.S. branch offices of  11 Jehovah’s Witnesses, and other  12 congregations.  13 <i>Affidavit of Allen Shuster</i>, ¶ 26 (Exhibit 1).</p>	23.
<p>14 24. Other Elders in the congregation serve as  15 a Theocratic Ministry School Overseer and a  16 <i>Watchtower</i> Study Conductor. During the  17 1970’s through the 1990’s other Elders also  18 served as Congregation Book Study  19 Overseers.  20 <i>Affidavit of Allen Shuster</i>, ¶ 27 (Exhibit 1).</p>	24.
<p>21 25. The Theocratic Ministry School Overseer  22 is responsible for organizing and instructing  23 a weekly midweek meeting entitled the  24 Theocratic Ministry School.  25 <i>Affidavit of Allen Shuster</i>, ¶ 28 (Exhibit 1).</p>	25.
<p>26 26. The <i>Watchtower</i> Study Conductor  27 organizes and oversees a weekly one-hour  28 meeting that takes place on the weekends  29 (usually Sunday) during which an article  30 from the <i>Watchtower</i> magazine is  31 considered.  32 <i>Affidavit of Allen Shuster</i>, ¶ 29 (Exhibit 1).</p>	26.
<p>33 27. Both the Theocratic Ministry School and  34 the <i>Watchtower</i> Study meetings are held at  35 the Kingdom Hall and are open to all  36 congregation members and to the public.  37 <i>Affidavit of Allen Shuster</i>, ¶ 30 (Exhibit 1).</p>	27.
<p>38 28. During the 1970’s through the 1990’s,  39 Congregation Book Study Overseers  40 organized and oversaw a second weekly one-  41 hour meeting of separate small groups that  42 generally met in the private homes of some</p>	28.

1	of the congregation members to study a Bible-based publication published by Jehovah's Witnesses.	
2	<i>Affidavit of Allen Shuster, ¶ 31 (Exhibit 1).</i>	
3	29. Each congregation also has "Ministerial Servants" who are appointed to assist the Elders to care for the practical needs of the congregations.	29.
4		
5	<i>Affidavit of Allen Shuster, ¶ 32 (Exhibit 1).</i>	
6	30. The responsibilities of Ministerial Servants include handling the congregation literature, congregation accounts, and congregation territory for the public ministry, caring for microphone and sound equipment during meetings, serving as attendants during congregation meetings, and maintaining the physical appearance and cleanliness of the Kingdom Hall.	30.
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11	<i>Affidavit of Allen Shuster, ¶ 33 (Exhibit 1).</i>	
12	31. Congregations also have "Regular Pioneers," who can be men, women, or children who are active in the public ministry.	31.
13		
14	<i>Affidavit of Allen Shuster, ¶ 34 (Exhibit 1).</i>	
15	32. During the 1970's through the 1990's, Regular Pioneers had to average 100 hours per month in the public ministry and later 90 hours a month. Beginning in 1976, Auxiliary Pioneers had a 60 hour per month average. Currently, Regular Pioneers have to average 70 hours per month in the public ministry and Auxiliary Pioneers have to average 50 hours per month.	32.
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19		
20	<i>Deposition of Juan Guardado, p. 19, lns. 10-20 (Exhibit 6); Affidavit of Allen Shuster, ¶ 35 (Exhibit 1).</i>	
21		
22	33. Elders, Ministerial Servants, and Regular and Auxiliary Pioneers are all volunteers and none of them are paid for their service nor do they receive any reimbursement for their transportation, living, or meal expenses.	33.
23		
24	<i>Affidavit of Allen Shuster, ¶ 36 (Exhibit 1).</i>	
25	34. Neither Watchtower, the U.S. branch offices of Jehovah's Witnesses, nor any	34.



<p>1 congregations of Jehovah’s Witnesses have any paid employees, and as previously noted, 2 there is no paid clergy class. <i>Affidavit of Allen Shuster, ¶ 37 (Exhibit 1).</i></p>	
<p>3 35. At least twice a year, the body of elders 4 of a congregation meets together to review 5 the qualifications of the men in the 6 congregation who might qualify to serve as an Elder or Ministerial Servant. <i>Affidavit of Allen Shuster, ¶ 38 (Exhibit 1).</i></p>	35.
<p>7 36. Elders are recommended from among the 8 Ministerial Servants in the congregation and 9 must meet the spiritual qualifications found 10 at 1 Timothy 3:1-7 and Titus 1:5-9. <i>Deposition of Ramon Preciado, p. 22, ln. 20 to p. 23, ln. 11 (Exhibit 7); Deposition of Jesus Montijo, p. 20, lns. 21-22 (Exhibit 3); Affidavit of Allen Shuster, ¶ 39 (Exhibit 1).</i></p>	36.
<p>11 37. Ministerial Servants are recommended 12 from other male members of the 13 congregation who are not serving as an Elder 14 or Ministerial Servant and who meet the 15 spiritual qualifications found at 1 Timothy 3:8-10, 12, 13. <i>Deposition of Jesus Montijo, p. 20, lns. 11-17 (Exhibit 3); Affidavit of Allen Shuster, ¶ 40 (Exhibit 1).</i></p>	37.
<p>16 38. A “Regular Pioneer,” or “Auxiliary 17 Pioneer” on the other hand, is a position that 18 any congregation member can apply for by 19 filling out an application and turning it into the Congregation Service Committee. <i>Affidavit of Allen Shuster, ¶ 41 (Exhibit 1).</i></p>	38.
<p>20 39. The Congregation Service Committee 21 reviews the application to determine, among 22 other factors, whether the individual meet the 23 spiritual and moral requirements and is likely to meet the monthly time requirement to serve as a Regular or Auxiliary Pioneer. <i>Affidavit of Allen Shuster, ¶ 42 (Exhibit 1).</i></p>	39.
<p>24 40. During the 1970’s through the 1990’s, 25 the local congregation Elders’ recommendations of Elders, Ministerial Servants, and Regular Pioneers had to be</p>	40.

<p>1 approved by the Service Department at the                  2 U.S. branch offices of Jehovah's Witnesses                  3 in New York before they could be appointed.                  4 However, Auxiliary Pioneers were approved                  5 by the local Congregation Service                  6 Committee without any review or approval                  7 by the Service Department at the U.S. branch                  8 offices.                  9 <i>Depositions of Ramon Preciado</i>, p. 21, ln. 8                  10 to p. 22, ln. 2; p. 24 lns. 4-16 (Exhibit 1);                  11 <i>Jesus Montijo</i>, p. 20, lns. 2-10 (Exhibit 3);                  12 <b><i>Affidavit of Allen Shuster</i>, ¶ 43 (Exhibit 1).</b></p>	
<p>13 41. During the 1970's through the 1990's, all                  14 appointments of Elders, Ministerial Servants,                  15 and Regular Pioneers in the United States                  16 were communicated by the Service                  17 Department to congregations through                  18 Watchtower.                  19 <b><i>Affidavit of Allen Shuster</i>, ¶ 44 (Exhibit 1).</b></p>	<p>41.</p>
<p>20 42. After the local congregation body of                  21 elders received the approval from                  22 Watchtower for an appointment, an                  23 announcement was made to the congregation                  24 during one of the regularly scheduled                  25 weekday meetings that the individual was                  appointed to serve as an Elder, Ministerial                  Servant, or Regular Pioneer. A similar                  announcement was made after a publisher                  was approved as an Auxiliary Pioneer by the                  local Congregation Service Committee.  <i>Deposition of Ramon Preciado</i>, p. 24, ln. 4 to                  p. 25 ln. 6 (Exhibit 7); <b><i>Affidavit of Allen</i></b>  <b><i>Shuster</i>, ¶ 45 (Exhibit 1).</b></p>	<p>42.</p>
<p>43. John Dorman, born on September 7,                  1977, was abused by Gonzalo Campos on                  two different dates within a twelve-month                  period when he was in first or second grade,                  or roughly from 1983 to 1984 when he was                  approximately 7 to 8 years old, and while                  both were associated with the Linda Vista                  Spanish Congregation.  <i>Deposition of John Dorman</i>, p. 8, lns. 2-3; p.                  34, ln. 25 to p. 35, lns. 23; p. 38, lns. 11-14                  (Exhibit 8); <i>Deposition of Gonzalo Campos</i>,                  p. 44, ln. 16 to p. 45, ln. 6; p. 53 lns. 7-19</p>	<p>43.</p>

1	(Exhibit 9); Second Amended Complaint, ¶ 5.	
2	44. Dorman stated that on the first date he was abused, Campos took him on a landscaping job and touched him inappropriately while in Campos's van on the way to and from the worksite.	44.
3	<i>Deposition of John Dorman</i> , p. 34, ln. 25 to p. 37, ln. 13 (Exhibit 8).	
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6	45. The second date he was abused was within twelve months when Campos abused him on the way to a different landscaping jobsite, and later that same day at a home where Campos's mother worked as a housecleaner.	45.
7	<i>Deposition of John Dorman</i> , p. 38, ln. 5 to p. 40, ln. 24 (Exhibit 8).	
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11	46. At age 16, Dorman first told his parents that he had been abused by Campos in the spring of 1994, and Dorman's parents thereafter contacted Elders in the Linda Vista Spanish Congregation about the alleged abuse.	46.
12	<i>Deposition of John Dorman</i> , p. 50, ln. 4 to p. 52, ln. 11 (Exhibit 8).	
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15	47. Defendant Campos was born on January 10, 1963, and began to associate with the Linda Vista Spanish Congregation in about 1979 or 1980, when he was 16 or 17 years old.	47.
16	<i>Deposition of Gonzalo Campos</i> , p. 12, lns. 23-24; p. 13, lns. 9-19; p. 15, lns. 1-3, 18-20 (Exhibit 9); <i>Affidavit of Ramon Preciado</i> , ¶ 3 (Exhibit 7).	
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21	48. As a teenager, Campos studied the Bible with Jehovah's Witnesses in the Linda Vista Spanish Congregation where he attended meetings along with his mother, and he was eventually invited by the publisher who studied the Bible with him to accompany the congregation in the field ministry as an approved associate of Jehovah's Witnesses.	48.
22	<i>Deposition of Gonzalo Campos</i> , p. 15, lns. 1-20 (Exhibit 9); p. 16, lns. 9-22; <i>Affidavit of</i>	
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1 2 3 4 5 6	<p><i>Ramon Preciado</i>, ¶ 4 (Exhibit 10).</p> <p>49. Campos was later baptized as one of Jehovah's Witnesses in 1980, at age 17, and he continued to attend meetings as a baptized publisher with the Linda Vista Spanish Congregation.</p> <p><i>Deposition of Gonzalo Campos</i>, p. 15, ln. 25 to p. 16, ln. 22 (Exhibit 9); <i>Affidavit of Ramon Preciado</i>, ¶ 5 (Exhibit 10); <i>Affidavit of Allen Shuster</i>, ¶ 7 (Exhibit 1).</p>	49.
7 8 9 10 11 12	<p>50. By 1986 the Linda Vista Spanish Congregation had grown larger in number and a separate congregation known as the La Jolla Spanish Congregation was formed in November 1986 as an offshoot of the Linda Vista Spanish Congregation.</p> <p><i>Deposition of Dennis Palmer</i>, p. 44, ln. 20, to p. 45, ln. 16; p. 47 lns. 2-7 (Exhibit 2); <i>Deposition of Gonzalo Campos</i>, p. 19, ln. 21 to p. 20 ln. 3 (Exhibit 9); <i>Affidavit of Ramon Preciado</i>, ¶ 6 (Exhibit 10).</p>	50.
13 14 15 16 17 18 19	<p>51. When the La Jolla Spanish Congregation was formed, Campos ceased his association with the Linda Vista Spanish Congregation and began to associate with the newly formed La Jolla Spanish Congregation because he lived closer to this new congregation so it was more convenient.</p> <p><i>Deposition of Dennis Palmer</i>, p. 49, lns. 1-8 (Exhibit 2); <i>Deposition of Gonzalo Campos</i>, p. 18, ln. 21 to p. 20 ln. 15 (Exhibit 9); <i>Affidavit of Ramon Preciado</i>, ¶ 7 (Exhibit 10).</p>	51.
20 21 22 23 24 25	<p>52. When Campos first began his association with the La Jolla Spanish Congregation, Campos was still only a baptized publisher (i.e., congregation member) and he was never a Ministerial Servant, Elder, or Regular or Auxiliary Pioneer while he was associated with the Linda Vista Spanish Congregation.</p> <p><i>Deposition of Gonzalo Campos</i>, p. 16, ln. 23 to p. 17, ln. 10; p. 17, lns. 19-23, p. 20, lns. 16-22 (Exhibit 9); <i>Affidavit of Ralph Schaefer</i>, ¶ 4 (Exhibit 11); <i>Affidavit of Ramon Preciado</i>, ¶ 8 (Exhibit 10); <i>Affidavit</i></p>	52.

<p>1 <b>of Allen Shuster, ¶¶ 46, 47 (Exhibit 1).</b></p> <p>2 53. It was not until December 22, 1988,</p> <p>3 when Campos was a member of the La Jolla</p> <p>4 Spanish Congregation, that he was first</p> <p>5 appointed to serve as a Ministerial Servant in</p> <p>6 the La Jolla Spanish Congregation, and he</p> <p>7 was never appointed as a Ministerial Servant</p> <p>8 in the Linda Vista Spanish Congregation, or</p> <p>9 in any other congregation of Jehovah's</p> <p>10 Witnesses, prior to that date.</p> <p>11 <i>Deposition of Gonzalo Campos</i>, p. 32, ln. 19</p> <p>12 to p. 33 ln. 9; p. 92, lns. 11-12 (Exhibit 9);</p> <p>13 <i>Affidavit of Allen Shuster, ¶ 46 (Exhibit 1);</i></p> <p>14 <i>Affidavit of Ramon Preciado, ¶ 9</i></p> <p>15 <i>(Exhibit 10).</i></p>	<p>53.</p>
<p>16 54. Subsequently, on June 23, 1993, Campos</p> <p>17 was appointed to serve as an Elder in the La</p> <p>18 Jolla Spanish Congregation, and he was</p> <p>19 never appointed to serve as an Elder in the</p> <p>20 Linda Vista Spanish Congregation, or in any</p> <p>21 other congregation of Jehovah's Witnesses,</p> <p>22 prior to that date.</p> <p>23 <i>Deposition of Gonzalo Campos</i>, p. 33, ln. 21</p> <p>24 to p. 34 ln. 8 (Exhibit 9); <i>Affidavit of Allen</i></p> <p>25 <i>Shuster, ¶ 47 (Exhibit 1).</i></p>	<p>54.</p>
<p>26 55. In January 1994, the La Jolla Spanish</p> <p>27 Congregation changed its name to Playa</p> <p>28 Pacifica Spanish Congregation and Gonzalo</p> <p>29 Campos continued to serve as an Elder there</p> <p>30 until he was disfellowshipped, or expelled</p> <p>31 from the congregation, on June 9, 1995.</p> <p>32 <i>Deposition of Gonzalo Campos</i>, p. 19, lns. 4-</p> <p>33 9; p. 66, ln. 16 to p. 67, ln. 7 (Exhibit 9);</p> <p>34 <i>Affidavit of Kevin Phillips, ¶¶ 2, 4 (Exhibit</i></p> <p>35 <i>12).</i></p>	<p>55.</p>
<p>36 56. At no time did Gonzalo Campos ever</p> <p>37 serve as a Regular Pioneer in the Linda Vista</p> <p>38 Spanish Congregation or in any other</p> <p>39 congregation of Jehovah's Witnesses, nor did</p> <p>40 Campos ever serve as an Auxiliary Pioneer</p> <p>41 while associated with the Linda Vista</p> <p>42 Spanish Congregation.</p> <p>43 <i>Deposition of Ramon Preciado</i>, p. 17, lns.</p> <p>44 19-24 (Exhibit 7); <i>Deposition of Arturo</i></p> <p>45 <i>Jemio</i>, p. 7 ln. 10, to p. 8, ln. 1; p. 20, lns. 19-</p>	<p>56.</p>

1 23 (Exhibit 13); <i>Deposition of Dennis Palmer</i> , p. 51, lns. 9-15 (Exhibit 2); 2 <i>Deposition of Gonzalo Campos</i> , p. 16, ln. 23 3 to p. 17 ln. 10; p. 17, lns. 19-23; p. 92, lns. 4 11-12 (Exhibit 9); <i>Affidavit of Ralph Schaefer</i> , ¶ 4 (Exhibit 11); <i>Affidavit of Ramon Preciado</i> , ¶ 8 (Exhibit 10).	
5 57. At no time was Campos ever a member 6 or employee of Watchtower. <i>Affidavit of Danny Bland</i> , ¶¶ 4, 5 (Exhibit 5).	57.

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