

***Exhibit C***

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**FILED**

**FEB 28 2007**

THOMAS R. FALLOUJST  
SPOKANE COUNTY CLERK

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF SPOKANE**

AIMEY MERIE VIGUE, a single person; )  
ROBERT SCOTT VIGUE and KAY )  
VIGUE, husband and wife, )  
 )  
Plaintiffs, )  
 )  
vs. )  
 )  
EDWARD NORMAN DAVIS and )  
CHERYLE RUSTAD, husband and wife and )  
marital community thereof; )  
WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC.; WATCH )  
TOWER BIBLE AND TRACT SOCIETY )  
OF PENNSYLVANIA; CHRISTIAN )  
CONGREGATION OF JEHOVAH'S )  
WITNESSES; OPPORTUNITY )  
CONGREGATION OF JEHOVAH'S )  
WITNESSES, )  
 )  
Defendants. )

No. 04-2-02451-4

**DECLARATION OF GARY N.  
BREAU**

I, Gary N. Breau, am over 18 years of age, make this Declaration based on personal knowledge, and am competent to testify herein.

1. I have served as an elder since 1972.

DECLARATION OF GARY N.  
BREAU - 1

*PAINÉ, HAMBLÉN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WA 99201 PHONE: (509) 455-6000*

1           2.     I have been a voting member of Watch Tower Bible and Tract Society of  
2 Pennsylvania since January 21, 2002. As a voting member, I attend all annual meetings of the  
3 corporation and am involved in all corporate decisions made by the voting members.

4           3.     Watch Tower Bible and Tract Society of Pennsylvania was incorporated in the  
5 State of Pennsylvania in 1884. It has its principal place of business at 25 Columbia Heights,  
6 Brooklyn, New York.

7           4.     Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower” is two  
8 words) is a separate corporate entity from Watchtower Bible and Tract Society of New York,  
9 Inc. (“Watchtower” is one word).

10          5.     Watch Tower Bible and Tract Society of Pennsylvania (“WT-PA”) has always  
11 maintained its own separate corporate records and observed all corporate formalities, and it  
12 has never had a parent or any subsidiary corporations, wholly-owned or otherwise.  
13

14          6.     WT-PA holds the copyright to publications of Jehovah’s Witnesses, makes  
15 funds donated worldwide available to local congregations of Jehovah’s Witnesses to assist in  
16 the construction of Kingdom Halls (places of worship), and provides assistance to local  
17 congregations in obtaining insurance coverage.  
18

19          7.     WT-PA has never exercised control over the personnel, accounting,  
20 management functions, or operational activities of any other corporation or entity.  
21

22          8.     Since 1994, I have also served in the capacity of an elder in the Service  
23 Department at the U.S. Branch Offices of Jehovah’s Witnesses in Patterson, New York. I  
24 provide spiritual assistance to elders in the United States who call or write to the Service  
25 Department for spiritual help. Prior to March 2001, the spiritual assistance provided by the  
26

27     DECLARATION OF GARY N.  
28     BREAUX - 2

*PAINÉ, HAMBLEN, COFFIN, BROOKE & MILLER LLP*  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

1 Service Department, along with the appointment of elders, was communicated to all  
2 congregations of Jehovah's Witnesses through Watchtower Bible and Tract Society of New  
3 York, Inc. ("WT-NY"). Since March 16, 2001, this communication, oversight, and control is  
4 communicated through Christian Congregation of Jehovah's Witnesses ("CCJW").  
5

6 9. CCJW was incorporated on August 21, 2000. I am also a voting member of  
7 CCJW and have served in that capacity since October 5, 2000. I can attest to the fact that  
8 since March 16, 2001, all spiritual assistance, oversight, appointment, and control of the  
9 congregations, including all elders of Jehovah's Witnesses in the United States, has been  
10 communicated by the Service Department through CCJW.

11 10. Since at least the 1960's, WT-PA has not been used to communicate spiritual  
12 assistance, supervision, or advice to any congregation of Jehovah's Witnesses in the United  
13 States.  
14

15 11. WT-PA has never appointed or supervised any elders in the Opportunity  
16 Congregation in Spokane, Washington. It has never appointed or supervised defendant  
17 Edward Davis as an elder in the Opportunity Congregation in Spokane, Washington.

18 12. WT-PA has never been used to communicate spiritual supervision or direction  
19 to any of the plaintiffs in the Opportunity Congregation, Spokane, Washington.  
20

21 13. Prior to October of 2002, WT-PA had no knowledge of any propensities of  
22 defendant Edward Davis or that he might pose a danger to minors.  
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27 DECLARATION OF GARY N.  
BREAUX - 3

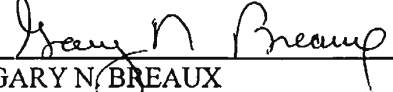
*PAINE, HAMBLEN, COFFIN, BROOKE & MILLER LLP*  
717 WEST SPRAGUE AVENUE, SUITE 1200  
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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct upon my knowledge, information, and belief.

DATED this 3 day of October, 2006.

  
GARY N. BREAUX

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DECLARATION OF GARY N.  
BREAUX - 4

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717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000