

# EXHIBIT 6

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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

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Veritext Legal Solutions, 50 Main Street,  
3rd Floor, White Plains, New York 10606,  
before Alison DiTuro, a Notary Public of  
the State of New York.

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ALSO PRESENT:  
Corey Wainaina

\* \* \*

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

knowledge, do you have an understanding of the functions that Watchtower Bible and Tract Society of New York carries out?

A. No, I -- I do not.

Q. Did you at any point in time have knowledge of that?

A. I possibly did in the past.

Q. When?

A. When I was more educated about Watchtower New York.

Q. Okay. And what was that period of time?

A. I don't remember.

Q. Can you give me an approximate?

A. I probably -- I don't remember that. Probably the -- I would say the 90s.

Q. Okay. And the same question, based upon your personal knowledge, do you currently have an understanding of what Watch Tower Bible and Tract Society of Pennsylvania does?

A. Well, I thought that was a statement. Was that a statement or -- or was that 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. BREAU

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 condition of the congregation, yes.

3 Q. And would you report on the  
4 recommendations as it pertained to  
5 appointment of elders?

6 A. If there was a recommendation,  
7 yes.

8 Q. And that would go in a written  
9 report or a verbal report to the service  
10 department?

11 A. Written.

12 Q. And was there a form that you  
13 used or would it be sort of a letter?

14 A. I do not recall. It's been  
15 years ago.

16 Q. And those reports, was there --  
17 did you ever receive feedback, do you  
18 recall, regarding the reports that you sent  
19 as a circuit overseer to the service  
20 department?

21 A. I don't recall.

22 Q. And during that period of time,  
23 would you make recommendations as well,  
24 personally, based on your observations?  
25 And by that, I mean to the service

1 G. BREAU

2 how to deal with calls involving reports of  
3 child sex abuse in your role as a desk man  
4 at the service department? At the service  
5 desk, excuse me.

6 A. Handling it as a shepherd, just  
7 to shepherd the brothers.

8 Q. And I guess my question is a  
9 little bit more general. I'm asking if you  
10 were ever instructed or taught how to --  
11 how to handle those calls.

12 A. I do not -- I do not remember.

13 MR. TAYLOR: Excuse me.

14 Q. You don't remember?

15 A. I do not remember. It's been  
16 years ago.

17 Q. You don't know whether you were  
18 given specific directions or general  
19 guidance about how to handle calls that  
20 came in to report instances of child sex  
21 abuse.

22 MS. KORGUL: Objection to the  
23 form.

24 A. I don't remember directions  
25 back -- back in the 90s when I was a desk

1 G. BREAUX

2 man and received a report of child sex  
3 abuse because -- if I understand  
4 correctly -- the elders in the congregation  
5 that you were communicating with would call  
6 the legal department to determine their  
7 obligations insofar as reporting these  
8 allegations externally.

9 Is that accurate?

10 A. Yes.

11 Q. And at -- so when you were a  
12 desk man, then, would you direct the elders  
13 to call the legal department if they asked  
14 you a question about reporting to secular  
15 authorities?

16 A. I don't remember. It's been so  
17 many years ago.

18 Q. Would you -- do you remember  
19 whether you just answered those questions  
20 for them?

21 A. No. I -- you mean the  
22 reporting?

23 Q. Yes.

24 A. Legal reporting, no. I  
25 wouldn't answer it.

1 G. BREAU

2 you -- your responsibility was to direct  
3 those elders who were asking that question  
4 to legal?

5 MS. KORUL: Objection to the  
6 form.

7 Q. Or did you make that decision  
8 on your own?

9 A. I don't know.

10 Q. Where did you -- did you have  
11 anything that you referred to, any  
12 documents or handbooks, anything you  
13 referred to to help you do your job when  
14 you were a desk man in the service  
15 department?

16 A. It's a long time ago. I'm sure  
17 there was some information, but I don't  
18 recall what we used.

19 Q. Do you recall at all what you  
20 used then?

21 A. The only thing I recall is a  
22 textbook that the elders have. That's --  
23 that's the extent that I remember.

24 Q. And do you remember what it's  
25 called?