

# Exhibit 2

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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.

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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: March 8, 2024

TIME: 9:06 A.M.

VIDEO-RECORDED DEPOSITION of the  
Defendant by a witness, THOMAS JEFFERSON,  
JR., taken by the respective parties,  
pursuant to a Notice and to the Federal

1 T. JEFFERSON

2 the testimony of two witnesses or on the  
3 testimony of three witnesses, the matter  
4 should be established."

5 Jehovah's Witnesses adhere to  
6 this scriptural exhortation and direction  
7 that, before taking any action that is in  
8 the context of whether someone should or  
9 should not be established as guilty of  
10 misconduct, there needs to be two witnesses  
11 or a confession.

12 But this thought of a two  
13 witness rule, no. Jehovah's Witnesses  
14 don't have a two witness rule. We have  
15 what the Bible says to establish a certain  
16 accusation.

17 Q. The Bible principle you just  
18 quoted to me is elaborated upon in numerous  
19 publications that Jehovah's Witnesses have  
20 sent to elders to guide them in their  
21 duties; correct?

22 A. Yes.

23 Q. What do you call that  
24 principle?

25 A. Just that, a Bible principle.

1 T. JEFFERSON

2 Q. Well, the Bible has lots of  
3 principles; right?

4 A. Yes.

5 Q. So which Bible principle is it?

6 A. It's a Bible principle that  
7 outlines how conduct is established in the  
8 absence of a confession.

9 Q. So your no answer to my  
10 previous question was about the use of the  
11 word rule?

12 A. I believe, in the form of your  
13 original question, you asked me about a two  
14 witness rule -- not an exact quote -- that  
15 Jehovah's Witnesses adhere to. We don't  
16 have a two witness rule. We have a Bible  
17 principle that helps elders to see that,  
18 when establishing an accusation, you need  
19 to abide by the fact that there are two  
20 witnesses -- eye witnesses to the conduct.

21 Q. That's a lot of words for me  
22 to use as a shorthand referring to that  
23 principle. Could we call it the two  
24 witness principle?

25 A. We can call it what the Bible

1 T. JEFFERSON

2 calls it that, namely, you need two  
3 witnesses to establish whether an  
4 accusation of conduct can be upheld,  
5 period. Obviously, I can't dictate what  
6 you call it, but that's what I'd like to  
7 call it.

8 Q. To the extent that principle is  
9 addressed in the publications that are  
10 provided to elders that we've discussed  
11 earlier today, that -- those publications  
12 contain Jehovah's Witnesses' interpretation  
13 of the relevant Bible verses regarding that  
14 principle; correct?

15 A. Those publications explain what  
16 Deuteronomy 19:15 and several other Bible  
17 verses say with regard to assisting people  
18 who are alleged to have been involved in  
19 some form of conduct that conflicts with  
20 the Bible. Elders are instructed to be  
21 guided by that principle before determining  
22 whether a person should or should not  
23 remain as one of Jehovah's Witnesses.

24 Q. And that would apply to elders  
25 in the Hardin Congregation during the

1 T. JEFFERSON

2 relevant time period; correct?

3 A. Yes.

4 Q. Were there any changes to that  
5 principle between 1973 and 1992?

6 A. Deuteronomy 19:15 is unchanged.

7 Q. Were there any changes to  
8 Jehovah's Witnesses' interpretation of that  
9 principle between 1973 and 1992?

10 A. And I'd ask you to clarify what  
11 you mean by interpretation since I repeated  
12 two or three times already what we do  
13 understand, and that remains unchanged.  
14 Maybe I'm missing something respectfully.

15 Q. We've talked all day about how  
16 the manuals contain or the publications  
17 contain interpretations of Bible principles  
18 that are helpful to guide elders; right?

19 A. Yes.

20 MR. TAYLOR: Objection to form.

21 Q. That was a yes?

22 A. Yes, we have.

23 Q. So that's the definition of  
24 interpretation I'd like you to use in  
25 answering the question that's pending.

1 T. JEFFERSON

2 A. So what question would you like  
3 to pose again, Counsel?

4 MR. MERRILL: Would you please  
5 read it back?

6 THE REPORTER: Okay.

7 (Whereupon, the referred to  
8 question was read back by the  
9 Reporter.)

10 A. No.

11 Q. The principle that we're  
12 discussing from the Bible regarding the  
13 presence of two witnesses is interpreted in  
14 the 1972 Kingdom Ministry School Course and  
15 in the Pay Attention to Yourselves and All  
16 the Flock publications; correct?

17 A. Perhaps. I don't know if  
18 there's a specific reference you would like  
19 me to draw attention to or is that a  
20 general question as to whether it appears  
21 in the document?

22 Q. It appears in both documents;  
23 correct?

24 A. I don't know unless I look  
25 exactly. I mean, I don't know. Is there a

1 T. JEFFERSON

2 specific reference you want me to comment  
3 on or...

4 Q. You testified earlier that you  
5 spent hours reading those documents to  
6 prepare for this deposition. Do you recall  
7 that?

8 MR. TAYLOR: Objection to the  
9 form. It's not a memory test.

10 A. I testified that I spent hours  
11 reviewing documents in preparation for the  
12 deposition. I did not say I read every  
13 single word and sentence in those  
14 documents, Counsel.

15 So if there is something  
16 specific you'd like me to comment on, I'd  
17 be more than happy to address it.

18 Q. I'd like you to please read  
19 topic 26B into the record. Please start  
20 with 26, and then you can skip to B, you  
21 know, skip over A. Thank you.

22 A. "All details of what is  
23 commonly referred to as the two witness  
24 rule or two witness principle as it existed  
25 between 1973 and 1992 including how the



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2 rule and any changes to it were  
3 communicated to elders, including any and  
4 all written guidance provided to local  
5 congregations regarding application of the  
6 rule and whether that guidance was ever  
7 communicated on WTNI -- WTNV letterhead or  
8 contained in WTNV documents."

9 Q. Your testimony, as you sit here  
10 today, is that you don't know whether that  
11 two witness principle is included in the  
12 documents 1972 Kingdom Ministry School  
13 Course or versions of Pay Attention to  
14 Yourself and All the Flock. Is that  
15 correct?

16 A. No. My testimony is I cannot  
17 comment specifically on what was said. I'm  
18 not denying that it may have been  
19 mentioned, not by any stretch. But what  
20 specifically, where, context, at this  
21 moment, I cannot say exactly.

22 Q. I'm not asking you whether it  
23 may have been mentioned. I'm asking you  
24 whether it was mentioned.

25 A. And I'm telling you I don't

1 T. JEFFERSON

2 recall exactly.

3 MR. MERRILL: And I'll object  
4 to that answer as nonresponsive to  
5 topic 26B.

6 Q. Are there other publications  
7 during the relevant time period where the  
8 principle was discussed?

9 A. Yes.

10 Q. Which ones?

11 A. Watchtowers, Awakes.

12 Deuteronomy 19:15 is discussed multiple  
13 times in our publications. It would be a  
14 voluminous review for me to try to sit down  
15 and point to every sentence in every  
16 article where Deuteronomy 19:15 appears.

17 So the answer is yes to your  
18 question. In multiple places, in study  
19 articles, in the Watchtower, it -- it is  
20 mentioned frequently throughout the  
21 publications and certainly over the  
22 relevant period.

23 Q. If this principle of needing  
24 two witnesses or a confession to establish  
25 a matter was discussed in the 1972 Kingdom

1 T. JEFFERSON

2 Ministry School Course or in versions of  
3 Pay Attention to Yourselves and All the  
4 Flock, would that discussion guide elders?

5 A. Yes.

6 Q. If, during the relevant period,  
7 elders received a report that a young girl  
8 in a Jehovah's Witness congregation was  
9 sexually abused by another member of the  
10 congregation and the alleged abuser denies  
11 that allegation, and there are no witnesses  
12 besides the young girl and the elder or --  
13 excuse me -- the alleged abuser -- pardon  
14 me -- do I understand correctly that the  
15 truth of the matter of the allegation would  
16 not be able to be established?

17 A. If a child accused an adult of  
18 child sexual abuse during the relevant  
19 period and the elders investigating the  
20 matter were unable to establish through  
21 confession from the accused or testimony of  
22 two witnesses that this actual allegation  
23 is true, then there would be no judicial  
24 action taken against the accused.

25 Q. That means that the accused

1 T. JEFFERSON

2 would continue to be in the congregation;  
3 correct?

4 A. Correct.

5 Q. The accused could continue to  
6 participate in the field service?

7 A. Correct.

8 Q. Let's talk about topic 27. Was  
9 there any rule or principle or policy about  
10 keeping certain information within  
11 Jehovah's Witness congregations  
12 confidential during the relevant period?

13 A. And so Counsel, in Proverbs  
14 11:13 -- this is what guided the elders  
15 then and still does today -- "A slanderer  
16 goes about revealing confidential talk, but  
17 the trustworthy person keeps confidence."

18 This guidance then, in the  
19 relevant period, served to guide elders  
20 related to information that came to their  
21 attention about the conduct of congregants.

22 Q. And you said that was -- was it  
23 Proverbs did you say?

24 A. Yes, sir. Proverbs 11 and --  
25 and verse 13.

1 T. JEFFERSON

2 Q. Is that verse discussed in  
3 Jehovah's Witness publications?

4 A. Yes, it is.

5 Q. And would those publications  
6 include the Jehovah's Witnesses'  
7 interpretation of that verse and guidance  
8 on how to apply it?

9 A. Yes.

10 Q. Can you give me a general  
11 statement of what that verse means and how  
12 it's interpreted?

13 A. Congregants who encounter  
14 difficulties in their life seek pastoral  
15 help from shepherds, what we read about  
16 earlier in First Peter 5. A wide range of  
17 problems from marital difficulties to  
18 serious health concerns are discussed with  
19 elders who -- by congregants who are  
20 seeking comfort and guidance.

21 Other times, though,  
22 congregants approach elders because they've  
23 made a serious error in judgment, and they  
24 want help to see how to work out their  
25 problem. When that happens, they approach

1 T. JEFFERSON

2 the elders, and they share that  
3 confidential information with them.

4 It's understood that elders, in  
5 discussing this problem, will not share  
6 that information with their wives or their  
7 children or anyone else not entitled to  
8 know about it. That's the application of  
9 that principle.

10 Q. Who else is entitled to know  
11 about it?

12 A. If the information that the  
13 congregant has shared requires that  
14 attention needs to be given as to whether  
15 they remain Jehovah's Witnesses or not, the  
16 body of elders as a whole will be informed.

17 Q. Other than the body of elders  
18 of that congregation, would any other  
19 Jehovah's Witnesses in the congregation be  
20 informed?

21 A. Generally not, no.

22 Q. What's the exception to your...

23 A. Well, let's say that the  
24 congregant who is approaching the elders is  
25 16 years old. He's just confessed that, in

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his relationship with a friend, they actually committed a crime. His parents, who are Jehovah's Witnesses, are unaware of it.

However, the elders realize that in order for him to receive the help he needs, even though he doesn't want his parents to know, they're going to have to know. They'll see to it that the parents are informed. They'll the give the minor the chance to inform his parents, and they'll even give him time.

A man who is married to his wife goes on a business trip. And on his business trip, they close a contract and they go to dinner with the business partners. For reasons he can't explain, when he wakes up the next morning, his secretary is beside him in the bed, and he doesn't know how she got there because they both had quite a bit to drink that night.

He loves his wife very much, but he tells the elders, I've done something seriously wrong, and I need help,

1 T. JEFFERSON

2 and I don't know how to tell my wife. Can  
3 you help me?

4 That's an example of where the  
5 elders will see to it that his wife knows  
6 through him. They'll help him, but she has  
7 to know. And also, they'll keep the matter  
8 confidential because others outside of his  
9 wife -- his brother in the same  
10 congregation, his cousin in the same  
11 congregation -- they don't need to know.

12 That's an example of applying  
13 the principle I just discussed with you and  
14 why elders are urged not to discuss it with  
15 others, even though the man's wife is the  
16 elder's wife's best friend. Those are two  
17 examples to illustrate my point, Counsel.

18 Q. Do elders ever share  
19 information they received in confidence  
20 with non-Jehovah's Witnesses?

21 A. Yes.

22 Q. When?

23 A. When a crime is committed, such  
24 as child sexual abuse, the elders will  
25 oftentimes report it, and that reporting



1 T. JEFFERSON

2 will go to the secular authorities who are  
3 not Jehovah's Witnesses.

4 Q. Are you referring to the  
5 current practice of calling -- elders  
6 calling the legal department for advice on  
7 reporting requirements when they hear of an  
8 allegation?

9 A. That's part of it, yes.

10 Q. Prior to 1992, did the  
11 Jehovah's Witnesses provide any guidance or  
12 direction to elders to call local  
13 authorities in the event of an allegation  
14 of child sex abuse?

15 A. It was first in July of 1989  
16 that elders were advised to call the legal  
17 department to seek such advice.

18 Q. What other circumstances would  
19 elders share information they received in  
20 confidence with non-Jehovah's Witnesses?

21 A. Sometimes what happens,  
22 Counsel, is that elders may become aware  
23 that someone plans to commit a serious  
24 crime. For example, they want to blow up a  
25 place. They plan to -- to shoot up a

1 T. JEFFERSON

2 place, for example.

3 Elders become aware of that  
4 even if they become aware of it in  
5 confidence. Then if the prospect of such a  
6 crime looms before them, they will call the  
7 authorities and apprise them of it. That's  
8 an example.

9 Q. Have there been changes in the  
10 obligation with respect to the obligation  
11 of elders to keep information confidential  
12 when they received in it confidence during  
13 the relevant period --

14 A. Well, that's --

15 Q. -- besides the 1989 letter that  
16 you referenced about calling the legal  
17 department?

18 A. First, excuse my interruption.  
19 And when you say changes, what do you mean,  
20 Counsel?

21 Q. What does the word change mean  
22 to you?

23 A. Well, change can mean a variety  
24 of things from changing my clothes to  
25 changing my posture, any number of things.

1 T. JEFFERSON

2 But I just want to make sure I  
3 understand what you're saying by change or  
4 else I'll start an explanation that may not  
5 address your question because I don't fully  
6 understand it, Counsel.

7 MR. MERRILL: Excuse me. I  
8 just have to note for the record an  
9 objection that that was  
10 nonresponsive.

11 Q. Please tell me about all the  
12 written guidance that's been provided to  
13 local congregations during the relevant  
14 period regarding this principle about  
15 keeping information received in confidence  
16 confidential.

17 A. During the relevant period,  
18 there have been a variety of letters,  
19 Watchtower and Awake articles, certainly  
20 the publications that are listed here that  
21 remind elders of the principle we just read  
22 in Deuteronomy 11. Here again, like  
23 Deuteronomy 19:15, there have been multiple  
24 references over that -- that 30-year or so  
25 period. '72 -- 20 years or so.

1 T. JEFFERSON

2 So I couldn't pinpoint exactly  
3 every time that principle appeared,  
4 Counsel. I can say, though, without  
5 equivocation there have been numerous  
6 reminders over that period of time in  
7 various publications.

8 Q. And those publications provide  
9 guidance and direction to elders with  
10 regard to that principle; correct?

11 A. And to -- to the congregants in  
12 general as well because often, Counsel,  
13 guidance to elders is not always just to  
14 elders. It's published in the Watchtower  
15 so that all the congregants can read it.  
16 So same thing with the publications we  
17 discussed earlier like the Lamp book, the  
18 Organized book, as we discussed earlier,  
19 all the congregants receive it.

20 But those reminders on  
21 confidentiality are published so that all  
22 congregants see it so that they can be  
23 assured that when they share confidential  
24 information with elders, it will remain  
25 just that. That's why it's published that

1 T. JEFFERSON

2 way.

3 Q. Now, if a child made an  
4 allegation regarding child sexual abuse in  
5 a congregation during the relevant period,  
6 even if the child and their parents did not  
7 wish to keep the allegation confidential,  
8 the elders would be required to keep it  
9 confidential; correct?

10 A. And so as stated, the elders  
11 would maintain confidentiality. They  
12 wouldn't discuss it with their wives, their  
13 children, their friends or anyone else.  
14 But the elders do not bar others, such as,  
15 for example, in your illustration, the  
16 parents and the child. They wouldn't bar  
17 them.

18 Q. And I think you just mentioned  
19 that the -- the principle applies not just  
20 to elders, but to all Jehovah's  
21 Witnesses -- correct -- in Deuteronomy?

22 A. The idea in Deuteronomy 19:15  
23 of two witnesses to establish, that's  
24 Deuteronomy 19:15. Are you referring --

25 Q. I'm sorry. I should've

1 T. JEFFERSON

2 referred to Proverbs. Forgive me. I think  
3 I was trying to refer to the Proverbs --

4 A. Proverbs 11.

5 Q. -- regarding keeping things  
6 confidential.

7 A. Yes. So what I said is it's  
8 published so that all Jehovah's Witnesses  
9 will be aware that when you confide in your  
10 elders, they will observe the principle of  
11 confidentiality. That's what I believe I  
12 pointed out earlier.

13 Q. So I want to go back to this  
14 example I gave of an allegation that's been  
15 made in the -- about child sex abuse within  
16 a congregation during the relevant period,  
17 and the child and their parents have no  
18 desire to keep the allegation confidential.

19 Is it acceptable for them to  
20 discuss it with other members of the  
21 congregation?

22 A. Yeah. So if a parent wants to  
23 discuss it with the authorities, the school  
24 or anybody else if parents feel -- or a  
25 doctor -- that's up to the parents to --

1 T. JEFFERSON

2 to -- to care for their child, whatever  
3 they need to do.

4 Parents are reminded, of  
5 course, that an accusation is not  
6 established unless there are -- are two  
7 witnesses, but parents are not told you  
8 can't -- you can't report this. You can't  
9 allege to the authorities that he molested  
10 your child, no. They're not told that.  
11 It's their choice.

12 Q. If they choose to share that  
13 information, then they'll be judged by God;  
14 correct?

15 A. If they choose to share that  
16 information as a personal decision, that  
17 would be up to them. I -- I can't say  
18 judged by God. I would say that's their  
19 personal decision.

20 Q. Would you say they'd be  
21 answerable to God with respect to that  
22 decision?

23 A. Any decision we all make makes  
24 us answerable to God, Counsel. Any  
25 decision.

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T. JEFFERSON

D E C L A R A T I O N

I hereby certify that having been first duly sworn to testify to the truth, I gave the above testimony.

I FURTHER CERTIFY that the foregoing transcript is a true and correct transcript of the testimony given by me at the time and place specified hereinbefore.

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THOMAS JEFFERSON, JR.

Subscribed and sworn to before me  
this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

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