

Pursuant to Mont. R. Civ. P. 15(a)(2), Plaintiff Alexis Nunez moves the Court for an Order granting her leave to file her Second Amended Complaint and to add Watchtower Bible and Tract Society of Pennsylvania as a party to this action. A copy of the Second Amended Complaint is attached to this Motion.

Watchtower Bible and Tract Society of Pennsylvania (“Watchtower PA”) was originally a Defendant in this case. They were dismissed without prejudice pursuant to an agreement between the parties. *See* Exhibit A. The agreement allows Plaintiff to re-assert all claims against Watchtower PA. *Id.* at ¶ 2. Watchtower PA agreed to toll the statute of limitations. *Id.* at ¶ 3. Additionally, Montana has extended to statute of limitations for this case until age 27. Plaintiff Nunez is 23 years old.

Watchtower PA provided Plaintiff with an affidavit stating that Watchtower PA holds copyrights, provides humanitarian aid, and assists branch offices with construction and operational support. Exhibit D. The affidavit is incomplete and inaccurate. Attached are SEC filings showing Watchtower PA as the owner of an offshore hedge fund with working capital of \$499,990,000. *See* Exhibit B. Their 2016 tax return shows their primary unrelated business activity as “investment activities” with a book value of \$1,004,209,000. Watchtower PA also operates a Trust. *See* Exhibit C.

Watchtower PA also stated that they do not form, organize, or oversee congregations at any location. *See* Ex. D at ¶ 12. Again, this is inaccurate. Watchtower PA has issued letters to congregations with instructions for handling complaints of child abuse. *See* Exhibit E.

Plaintiff Alexis Nunez submits her Second Amended Complaint asserting causes of action against Watchtower Bible and Tract Society of New York, Inc., Watchtower PA,

Christian Congregation of Jehovah's Witnesses, and Thompson Falls Congregation of Jehovah's Witnesses based on negligence and joint venture/enterprise liability.

This Motion is further supported by Plaintiff's Motion for Leave to Proceed with Common Law Negligence and Brief in Support, dated January 23, 2020, incorporated by reference.

RESPECTFULLY SUBMITTED this 6th day of February, 2020.

Attorneys for Plaintiffs:

NIX PATTERSON, LLP

GALLIK, BREMER & MOLLOY, P.C.

By: 
James P. Molloy

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served upon all attorneys of record via Email on this the 6th day of February, 2020.

Hard copies have been mailed, by U.S. mail, to the following:

PERSONAL AND CONFIDENTIAL

Ivy McGowan Castleberry
5404 Gunpowder Street
Gillette, WY 82718

PERSONAL AND CONFIDENTIAL

Maximo Reyes
P.O. Box 566
Plains, MT 59858



Chambers Copy: Hon. James A. Manley

EXHIBIT “A”

WATCHTOWER BIBLE AND)	
TRACT SOCIETY OF)	
NEW YORK, INC.;)	
CHRISTIAN CONGREGATION OF)	
JEHOVAH'S WITNESSES and)	
THOMPSON FALLS)	
CONGREGATION OF)	
JEHOVAH'S WITNESSES)	
)	
Third-Party Plaintiffs,)	
)	
vs.)	
)	
MAXIMO NAVA REYES,)	
)	
Third-Party Defendants.)	
)	

Pursuant to Mont. R. Civ. P. 41(a)(1), the parties, by and through their undersigned counsel, hereby stipulate and agree:

1. Defendant Watchtower Bible and Tract Society of Pennsylvania, Inc. ("WBTS Pennsylvania") is hereby dismissed without prejudice, subject to the conditions set forth below.

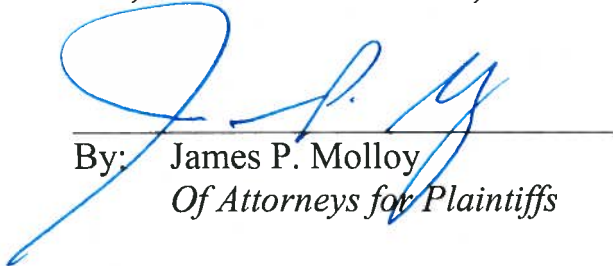
2. Plaintiffs reserve the right to re-assert all claims against WBTS Pennsylvania by joining it as a party to this case if facts or circumstances warrant.

3. If Plaintiffs join WBTS Pennsylvania as a party, WBTS Pennsylvania shall not assert any statute of limitations defenses based on time accruing since the date of the First Amended Complaint in this matter, November 14, 2016.

4. Subject to paragraph 3 of this Stipulation, WBTS Pennsylvania reserves the right to assert the same defenses, including the statute of limitations defenses, as those asserted by Defendants Watchtower Bible and Tract Society of New York, Inc., Christian Congregation of Jehovah's Witnesses and Thompson Falls Congregation of Jehovah's Witnesses.

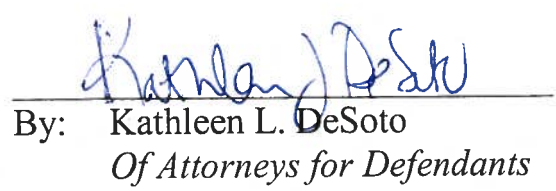
IT IS SO STIPULATED AND AGREED:

GALLIK, BREMER & MOLLOY, P.C.
NIX, PATTERSON & ROACH, LLP


By: James P. Molloy
Of Attorneys for Plaintiffs

Dated: 4-19-17

GARLINGTON, LOHN & ROBINSON, PLLP
Joel M. Taylor


By: Kathleen L. DeSoto
Of Attorneys for Defendants

Dated: 4/17/17

EXHIBIT “B”

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

OMB APPROVAL
OMB Number:..... 3235-0076
Expires: April 30, 2008
Estimated average burden
hours per form 16.00



**FORM D
NOTICE OF SALE OF SECURITIES
PURSUANT TO REGULATION D,
SECTION 4(6), AND/OR
UNIFORM LIMITED OFFERING EXEMPTION**

SEC USE ONLY	
Prefix	Serial
DATE RECEIVED	

Name of Offering (check if this is an amendment and name has changed, and indicate change.)
Offering of Shares of K2 STB Fund, Ltd.

Filing Under (Check box(es) that apply): Rule 504 Rule 505 Rule 506 Section 4(6) ULOE
Type of Filing: New Filing Amendment

A. BASIC IDENTIFICATION DATA

1. Enter the information requested about the issuer

Name of Issuer (check if this is an amendment and name has changed, and indicate change.)
K2 STB Fund, Ltd.

Address of Executive Offices: (Number and Street, City, State, Zip Code)
c/o K2/D&S Management Co., L.L.C., 200 Atlantic Street, 12th Floor, Stamford, CT 06901 Telephone Number (Including Area Code)
(203)348.5252

Address of Principal Offices (if different from Executive Offices) (Number and Street, City, State, Zip Code)
Telephone Number (Including Area Code)

Brief Description of Business: **Private Investment Company**

PROCESSED
NOV 20 2007

Type of Business Organization
 corporation limited partnership, already formed other (please specify)
 business trust limited partnership, to be formed **Cayman Islands exempted company**

Actual or Estimated Date of Incorporation or Organization: Month **09** Year **2007** Actual Estimated
Jurisdiction of Incorporation or Organization: (Enter two-letter U.S. Postal Service Abbreviation for State; CN for Canada; FN for other foreign jurisdiction) **F N**

GENERAL INSTRUCTIONS

Federal:

Who Must File: All issuers making an offering of securities in reliance on an exemption under Regulation D or Section 4(6), 17 CFR 230.501 et seq. or 15 U.S.C. 77d(6).

When To File: A notice must be filed no later than 15 days after the first sale of securities in the offering. A notice is deemed filed with the U.S. Securities and Exchange Commission (SEC) on the earlier of the date it is received by the SEC at the address given below or, if received at that address after the date on which it is due, on the date it was mailed by United States registered or certified mail to that address.

Where to File: U.S. Securities and Exchange Commission, 450 Fifth Street, N.W., Washington, D.C. 20549.

Copies Required: Five (5) copies of this notice must be filed with the SEC, one of which must be manually signed. Any copies not manually signed must be photocopies of the manually signed copy or bear typed or printed signatures.

Information Required: A new filing must contain all information requested. Amendments need only report the name of the issuer and offering, any changes thereto, the information requested in Part C, and any material changes from the information previously supplied in Parts A and B. Part E and the appendix need not be filed with the SEC.

Filing Fee: There is no federal filing fee.

State:

This notice shall be used to indicate reliance on the Uniform Limited Offering Exemption (ULOE) for sales of securities in those states that have adopted ULOE and that have adopted this form. Issuers relying on ULOE must file a separate notice with the Securities Administrator in each state where sales are to be, or have been made. If a state requires the payment of a fee as a precondition to the claim for the exemption, a fee in the proper amount shall accompany this form. This notice shall be filed in the appropriate states in accordance with state law. The Appendix to the notice constitutes a part of this notice and must be completed.

ATTENTION

Failure to file notice in the appropriate states will not result in a loss of the federal exemption. Conversely, failure to file the appropriate federal notice will not result in a loss of an available state exemption unless such exemption is predicated on the filing of a federal notice.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

A. BASIC IDENTIFICATION DATA

2. Enter the information requested for the following:
- Each promoter of the issuer, if the issuer has been organized within the past five years;
 - Each beneficial owner having the power to vote or dispose, or direct the vote or disposition of, 10% or more of a class of equity securities of the issuer;
 - Each executive officer and director of corporate issuers and of corporate general and managing partners of partnership issuers; and
 - Each general and managing partner of partnership issuers.

Check Box(es) that Apply: Administrator Beneficial Owner Executive Officer Director Investment Manager

Full Name (Last name first, if individual): **K2/D&S Management Co. L.L.C.**

Business or Residence Address (Number and Street, City, State, Zip Code):

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Administrator Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **Citco Fund Services (Curacao) N.V.**

Business or Residence Address (Number and Street, City, State, Zip Code): **Kaya Flamboyan 9**

P.O. Box 4774, Willemstad, Curacao, Netherlands Antilles

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **William A. Douglass, III**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **John T. Ferguson, Jr.**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **David C. Saunders**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **Watch Tower Bible and Tract Society of Pennsylvania**

Business or Residence Address (Number and Street, City, State, Zip Code): **25 Columbia Heights, Brooklyn, NY 11201-2483**

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual):

Business or Residence Address (Number and Street, City, State, Zip Code):

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual):

Business or Residence Address (Number and Street, City, State, Zip Code):

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

(Use blank sheet, or copy and use additional copies of this sheet, as necessary)

B. INFORMATION ABOUT OFFERING

1. Has the issuer sold, or does the issuer intend to sell, to non-accredited investors in this offering? Yes No
Answer also in Appendix, Column 2, if filing under ULOE.
2. What is the minimum investment that will be accepted from any individual?
subject to reduction at the sole discretion of the Board of Directors \$100,000
3. Does the offering permit joint ownership of a single unit? Yes No
4. Enter the information requested for each person who has been or will be paid or given, directly or indirectly, any commission or similar remuneration for solicitation of purchasers in connection with sales of securities in the offering. If a person to be listed is an associated person or agent of a broker or dealer registered with the SEC and/or with a state or states, list the name of the broker or dealer. If more than five (5) persons to be listed are associated persons of such a broker or dealer, you may set forth the information for that broker or dealer only.

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers

(Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
 [RI] [SC] [SD] [TN] [TX] [UT] [VT] [VA] [WA] [WV] [WI] [WY] [PR]

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers

(Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
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Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers

(Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
 [RI] [SC] [SD] [TN] [TX] [UT] [VT] [VA] [WA] [WV] [WI] [WY] [PR]

(Use blank sheet, or copy and use additional copies of this sheet, as necessary)

C. OFFERING PRICE, NUMBER OF INVESTORS, EXPENSES AND USE OF PROCEEDS

1. Enter the aggregate offering price of securities included in this offering and the total amount already sold. Enter "0" if answer is "none" or "zero." If the transaction is an exchange offering, check this box and indicate in the columns below the amounts of the securities offered for exchange and already exchanged.

Type of Security	Aggregate Offering Price	Amount Already Sold
Debt.....	\$ 0	\$ 0
Equity.....	\$ 0	\$ 0
<input type="checkbox"/> Common <input type="checkbox"/> Preferred		
Convertible Securities (including warrants).....	\$ 0	\$ 0
Partnership Interests.....	\$	\$ 0
Other (Specify) Shares	\$ 500,000,000	\$ 40,000,000
Total.....	\$ 500,000,000	\$ 40,000,000

Answer also in Appendix, Column 3, if filing under ULOE

2. Enter the number of accredited and non-accredited investors who have purchased securities in this offering and the aggregate dollar amounts of their purchases. For offerings under Rule 504, indicate the number of persons who have purchased securities and the aggregate dollar amount of their purchases on the total lines. Enter "0" if answer is "none" or "zero."

	Number Investors	Aggregate Dollar Amount of Purchases
Accredited Investors.....	1	\$ 40,000,000
Non-accredited Investors.....	n/a	\$ n/a
Total (for filings under Rule 504 only).....	0	\$ 0

Answer also in Appendix, Column 4, if filing under ULOE

3. If this filing is for an offering under Rule 504 or 505, enter the information requested for all securities sold by the issuer, to date, in offerings of the types indicated, in the twelve (12) months prior to the first sale of securities in this offering. Classify securities by type listed in Part C—Question 1.

Type of Offering	Types of Security	Dollar Amount Sold
Rule 505.....	n/a	\$ n/a
Regulation A.....	n/a	\$ n/a
Rule 504.....	n/a	\$ n/a
Total.....	n/a	\$ n/a

4. a. Furnish a statement of all expenses in connection with the issuance and distribution of the securities in this offering. Exclude amounts relating solely to organization expenses of the issuer. The information may be given as subject to future contingencies. If the amount of expenditure is not known, furnish an estimate and check the box to the left of the estimate.

Transfer Agent's Fees.....	<input type="checkbox"/>	\$ 0
Printing and Engraving Costs.....	<input type="checkbox"/>	\$ 0
Legal Fees.....	<input checked="" type="checkbox"/>	\$ 10,000
Accounting Fees.....	<input type="checkbox"/>	\$ 0
Engineering Fees.....	<input type="checkbox"/>	\$ 0
Sales Commissions (specify finders' fees separately).....	<input type="checkbox"/>	\$ 0
Other Expenses (identify).....	<input type="checkbox"/>	\$ 0
Total.....	<input checked="" type="checkbox"/>	\$ 10,000

4 b. Enter the difference between the aggregate offering price given in response to Part C-Question 1 and total expenses furnished in response to Part C-Question 4.a. This difference is the "adjusted gross proceeds to the issuer."

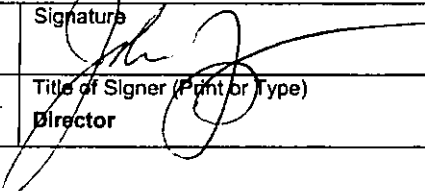
\$ 499,990,000

5 Indicate below the amount of the adjusted gross proceeds to the issuer used or proposed to be used for each of the purposes shown. If the amount for any purpose is not known, furnish an estimate and check the box to the left of the estimate. The total of the payments listed must equal the adjusted gross proceeds to the issuer set forth in response to Part C - Question 4.b. above.

		Payments to Officers, Directors & Affiliates		Payments to Others
Salaries and fees	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Purchase of real estate	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Purchase, rental or leasing and installation of machinery and equipment.....	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Construction or leasing of plant buildings and facilities.....	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Acquisition of other businesses (including the value of securities involved in this offering that may be used in exchange for the assets or securities of another issuer pursuant to a merger.....)	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Repayment of indebtedness.....	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Working capital.....	<input type="checkbox"/>	\$ 0	<input checked="" type="checkbox"/>	\$ 499,990,000
Other (specify):	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
.....	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Column Totals.....	<input type="checkbox"/>	\$ 0	<input checked="" type="checkbox"/>	\$ 499,990,000
Total payments Listed (column totals added)	<input type="checkbox"/>		<input checked="" type="checkbox"/>	\$ 499,990,000

D. FEDERAL SIGNATURE

This issuer has duly caused this notice to be signed by the undersigned duly authorized person. If this notice is filed under Rule 505, the following signature constitutes an undertaking by the issuer to furnish to the U.S. Securities and Exchange Commission, upon written request of its staff, the information furnished by the issuer to any non-accredited investor pursuant to paragraph (b)(2) of Rule 502.

Issuer (Print or Type) K2 STB Fund, Ltd.	Signature 	Date November 13, 2007
Name of Signer (Print or Type) John T. Ferguson	Title of Signer (Print or Type) Director	

ATTENTION

Intentional misstatements or omissions of fact constitute federal criminal violations. (See 18 U.S.C. 1001.)

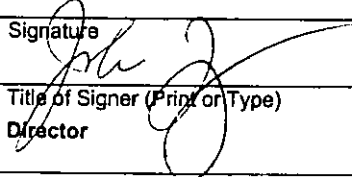
E. STATE SIGNATURE

1. Is any party described in 17 CFR 230.252(c), (d), (e) or (f) presently subject to any of the disqualification provisions of such rule?

See Appendix, Column 5, for state response.

- 2. The undersigned issuer hereby undertakes to furnish to any state administrator of any state in which this notice is filed, a notice on Form D (17 CFR 239.500) at such times as required by state law.
- 3. The undersigned issuer hereby undertakes to furnish to the state administrators, upon written request, information furnished by the issuer to offerees.
- 4. The undersigned issuer represents that the issuer is familiar with the conditions that must be satisfied to be entitled to the Uniform limited Offering Exemption (ULOE) of the state in which this notice is filed and understands that the issuer claiming the availability of this exemption has the burden of establishing that these conditions have been satisfied.

The issuer has read this notification and knows the contents to be true and has duly caused this notice to be signed on its behalf by the undersigned duly authorized person.

Issuer (Print or Type) K2 STB Fund, inc.	Signature 	Date November 13, 2007
Name of Signer (Print or Type) John T. Ferguson	Title of Signer (Print or Type) Director	

Instruction:

Print the names and title of the signing representative under his signature for the state portion of this form. One copy of every notice on Form D must be manually signed or bear typed or printed signatures.

APPENDIX

1	2		3	4				5	
	Intend to sell to non-accredited investors in State (Part B - Item 1)			Type of security and aggregate offering price offered in state (Part C - Item 1)	Type of investor and amount purchased in State (Part C - Item 2)				Disqualification under State ULOE (if yes, attach explanation of waiver granted) (Part E - Item 1)
State	Yes	No	Shares	Number of Accredited Investors	Amount	Number of Non-Accredited Investors	Amount	Yes	No
AL									
AK									
AZ									
AR									
CA									
CO									
CT									
DE									
DC									
FL									
GA									
HI									
ID									
IL									
IN									
IA									
KS									
KY									
LA									
ME									
MD									
MA									
MI									
MN									
MS									
MO									
MT									
NE									
NV									
NH									
NJ									
NM									

APPENDIX

1	2		3	4				5	
	Intend to sell to non-accredited investors in State (Part B - Item 1)			Type of security and aggregate offering price offered in state (Part C - Item 1)	Type of investor and Amount purchased in State (Part C - Item 2)		Disqualification under State ULOE (if yes, attach explanation of waiver granted) (Part E - Item 1)		
State	Yes	No	Shares	Number of Accredited Investors	Amount	Number of Non-Accredited Investors	Amount	Yes	No
NY		X	\$500,000,000	1	\$40,000,000	0	\$0		X
NC									
ND									
OH									
OK									
OR									
PA									
RI									
SC									
SD									
TN									
TX									
UT									
VT									
VA									
WA									
WV									
WI									
WY									
Non US									

END

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

**FORM D
NOTICE OF SALE OF SECURITIES
PURSUANT TO REGULATION D,
SECTION 4(6), AND/OR
UNIFORM LIMITED OFFERING EXEMPTION**

0001418838

OMB APPROVAL	
OMB Number:	3235-0076
Expires:	March 15, 2009
Estimated average burden hours per form	16.00
SEC USE ONLY	
Prefix	Serial
DATE RECEIVED	

Name of Offering (check if this is an amendment and name has changed, and indicate change.)

Offering of Shares of K2 STB Fund, Ltd.

Filing Under (Check box(es) that apply): Rule 504 Rule 505 Rule 506 Section 4(6) ULOE
Type of Filing: New Filing Amendment

SEC Mail Processing
Section

A. BASIC IDENTIFICATION DATA

1. Enter the information requested about the issuer

Name of Issuer (check if this is an amendment and name has changed, and indicate change.)

K2 STB Fund, Ltd.

MAR 19 2009

Address of Executive Offices: (Number and Street, City, State, Zip Code)
c/o K2/D&S Management Co., L.L.C., 200 Atlantic Street, 12th Floor, Stamford, CT 06901

Telephone Number (Including Area Code)
**Washington, DC
(203) 348-5252**

Address of Principal Offices (if different from Executive Offices) (Number and Street, City, State, Zip Code)

Telephone Number (Including Area Code)

Brief Description of Business: **Private Investment Company**

Type of Business Organization

corporation limited partnership, already formed other (please specify)
 business trust limited partnership, to be formed **Cayman Islands exempted company**

Actual or Estimated Date of Incorporation or Organization: Month Year Actual Estimated

Jurisdiction of Incorporation or Organization: (Enter two-letter U.S. Postal Service Abbreviation for State; CN for Canada; FN for other foreign jurisdiction)

GENERAL INSTRUCTIONS

Federal:
Who Must File: All issuers making an offering of securities in reliance on an exemption under Regulation D or Section 4(6), 17 CFR 230.501 et seq. or 15 U.S.C. 77d(6).
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Where to File: U.S. Securities and Exchange Commission, 450 Fifth Street, N.W., Washington, D.C. 20549.
Copies Required: Five (5) copies of this notice must be filed with the SEC, one of which must be manually signed. Any copies not manually signed must be photocopies of the manually signed copy or bear typed or printed signatures.
Information Required: A new filing must contain all information requested. Amendments need only report the name of the issuer and offering, any changes thereto, the information requested in Part C, and any material changes from the information previously supplied in Parts A and B. Part E and the appendix need not be filed with the SEC.
Filing Fee: There is no federal filing fee.

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Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.



09036528

A. BASIC IDENTIFICATION DATA

2. Enter the information requested for the following:
- Each promoter of the issuer, if the issuer has been organized within the past five years;
 - Each beneficial owner having the power to vote or dispose, or direct the vote or disposition of, 10% or more of a class of equity securities of the issuer;
 - Each executive officer and director of corporate issuers and of corporate general and managing partners of partnership issuers; and
 - Each general and managing partner of partnership issuers.

Check Box(es) that Apply: Administrator Beneficial Owner Executive Officer Director Investment Manager

Full Name (Last name first, if individual): **K2/D&S Management Co. L.L.C.**

Business or Residence Address (Number and Street, City, State, Zip Code):

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Administrator Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **Citco Fund Services (Curacao) N.V.**

Business or Residence Address (Number and Street, City, State, Zip Code): **Kaya Flamboyan 9**

P.O. Box 4774, Willemstad, Curacao, Netherlands Antilles

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **William A. Douglass, III**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **John T. Ferguson, Jr.**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **David C. Saunders**

Business or Residence Address (Number and Street, City, State, Zip Code): **c/o K2/D&S Management Company, L.L.C.**

300 Atlantic Street, 12th Floor, Stamford, Connecticut 06910

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual): **Watch Tower Bible and Tract Society of Pennsylvania**

Business or Residence Address (Number and Street, City, State, Zip Code): **25 Columbia Heights, Brooklyn, NY 11201-2483**

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual):

Business or Residence Address (Number and Street, City, State, Zip Code):

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

Full Name (Last name first, if individual):

Business or Residence Address (Number and Street, City, State, Zip Code):

Check Box(es) that Apply: Promoter Beneficial Owner Executive Officer Director General and/or Managing Partner

(Use blank sheet, or copy and use additional copies of this sheet, as necessary)

B. INFORMATION ABOUT OFFERING

1. Has the issuer sold, or does the issuer intend to sell, to non-accredited investors in this offering?..... Yes No
 Answer also in Appendix, Column 2, if filing under ULOE.

2. What is the minimum investment that will be accepted from any individual?
***subject to reduction at the sole discretion of the Board of Directors**..... \$100,000*

3. Does the offering permit joint ownership of a single unit?..... Yes No

4. Enter the information requested for each person who has been or will be paid or given, directly or indirectly, any commission or similar remuneration for solicitation of purchasers in connection with sales of securities in the offering. If a person to be listed is an associated person or agent of a broker or dealer registered with the SEC and/or with a state or states, list the name of the broker or dealer. If more than five (5) persons to be listed are associated persons of such a broker or dealer, you may set forth the information for that broker or dealer only.

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers
 (Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
 [RI] [SC] [SD] [TN] [TX] [UT] [VT] [VA] [WA] [WV] [WI] [WY] [PR]

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers
 (Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
 [RI] [SC] [SD] [TN] [TX] [UT] [VT] [VA] [WA] [WV] [WI] [WY] [PR]

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers
 (Check "All States" or check individual States).....

All States

- [AL] [AK] [AZ] [AR] [CA] [CO] [CT] [DE] [DC] [FL] [GA] [HI] [ID]
 [IL] [IN] [IA] [KS] [KY] [LA] [ME] [MD] [MA] [MI] [MN] [MS] [MO]
 [MT] [NE] [NV] [NH] [NJ] [NM] [NY] [NC] [ND] [OH] [OK] [OR] [PA]
 [RI] [SC] [SD] [TN] [TX] [UT] [VT] [VA] [WA] [WV] [WI] [WY] [PR]

(Use blank sheet, or copy and use additional copies of this sheet, as necessary)

C. OFFERING PRICE, NUMBER OF INVESTORS, EXPENSES AND USE OF PROCEEDS

1. Enter the aggregate offering price of securities included in this offering and the total amount already sold. Enter "0" if answer is "none" or "zero." If the transaction is an exchange offering, check this box and indicate in the columns below the amounts of the securities offered for exchange and already exchanged.

Type of Security	Aggregate Offering Price	Amount Already Sold
Debt	\$ 0	\$ 0
Equity	\$ 0	\$ 0
<input type="checkbox"/> Common <input type="checkbox"/> Preferred		
Convertible Securities (including warrants)	\$ 0	\$ 0
Partnership Interests	\$ 0	\$ 0
Other (Specify) Shares	\$ 500,000,000	\$ 40,000,000
Total	\$ 500,000,000	\$ 40,000,000

Answer also in Appendix, Column 3, if filing under ULOE

2. Enter the number of accredited and non-accredited investors who have purchased securities in this offering and the aggregate dollar amounts of their purchases. For offerings under Rule 504, indicate the number of persons who have purchased securities and the aggregate dollar amount of their purchases on the total lines. Enter "0" if answer is "none" or "zero."

	Number Investors	Aggregate Dollar Amount of Purchases
Accredited Investors	1	\$ 40,000,000
Non-accredited Investors	n/a	\$ n/a
Total (for filings under Rule 504 only)	0	\$ 0

Answer also in Appendix, Column 4, if filing under ULOE

3. If this filing is for an offering under Rule 504 or 505, enter the information requested for all securities sold by the issuer, to date, in offerings of the types indicated, in the twelve (12) months prior to the first sale of securities in this offering. Classify securities by type listed in Part C-Question 1.

Type of Offering	Types of Security	Dollar Amount Sold
Rule 505	n/a	\$ n/a
Regulation A	n/a	\$ n/a
Rule 504	n/a	\$ n/a
Total	n/a	\$ n/a

4. a. Furnish a statement of all expenses in connection with the issuance and distribution of the securities in this offering. Exclude amounts relating solely to organization expenses of the issuer. The information may be given as subject to future contingencies. If the amount of expenditure is not known, furnish an estimate and check the box to the left of the estimate.

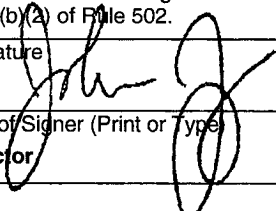
Transfer Agent's Fees	<input type="checkbox"/>	\$ 0
Printing and Engraving Costs	<input type="checkbox"/>	\$ 0
Legal Fees	<input checked="" type="checkbox"/>	\$ 10,000
Accounting Fees	<input type="checkbox"/>	\$ 0
Engineering Fees	<input type="checkbox"/>	\$ 0
Sales Commissions (specify finders' fees separately)	<input type="checkbox"/>	\$ 0
Other Expenses (identify) _____)	<input type="checkbox"/>	\$ 0
Total	<input checked="" type="checkbox"/>	\$ 10,000

- 4 b. Enter the difference between the aggregate offering price given in response to Part C-Question 1 and total expenses furnished in response to Part C-Question 4.a. This difference is the "adjusted gross proceeds to the issuer." \$ 499,990,000
- 5 Indicate below the amount of the adjusted gross proceeds to the issuer used or proposed to be used for each of the purposes shown. If the amount for any purpose is not known, furnish an estimate and check the box to the left of the estimate. The total of the payments listed must equal the adjusted gross proceeds to the issuer set forth in response to Part C - Question 4.b. above.

		Payments to Officers, Directors & Affiliates		Payments to Others
Salaries and fees	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Purchase of real estate	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Purchase, rental or leasing and installation of machinery and equipment	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Construction or leasing of plant buildings and facilities	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Acquisition of other businesses (including the value of securities involved in this offering that may be used in exchange for the assets or securities of another issuer pursuant to a merger)	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Repayment of indebtedness	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Working capital	<input type="checkbox"/>	\$ 0	<input checked="" type="checkbox"/>	\$ 499,990,000
Other (specify): _____	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
_____	<input type="checkbox"/>	\$ 0	<input type="checkbox"/>	\$ 0
Column Totals	<input type="checkbox"/>	\$ 0	<input checked="" type="checkbox"/>	\$ 499,990,000
Total payments Listed (column totals added)	<input type="checkbox"/>		<input checked="" type="checkbox"/>	\$ 499,990,000

D. FEDERAL SIGNATURE

This issuer has duly caused this notice to be signed by the undersigned duly authorized person. If this notice is filed under Rule 505, the following signature constitutes an undertaking by the issuer to furnish to the U.S. Securities and Exchange Commission, upon written request of its staff, the information furnished by the issuer to any non-accredited investor pursuant to paragraph (b)(2) of Rule 502.

Issuer (Print or Type) <u>K2 STB Fund, Ltd.</u>	Signature 	Date March 13, 2009
Name of Signer (Print or Type) John T. Ferguson	Title of Signer (Print or Type) Director	

ATTENTION

Intentional misstatements or omissions of fact constitute federal criminal violations. (See 18 U.S.C. 1001.)

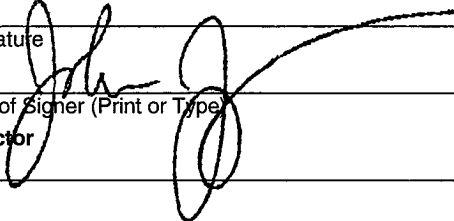
E. STATE SIGNATURE

1. Is any party described in 17 CFR 230.252(c), (d), (e) or (f) presently subject to any of the disqualification provisions of such rule? **No**

See Appendix, Column 5, for state response.

- 2. The undersigned issuer hereby undertakes to furnish to any state administrator of any state in which this notice is filed, a notice on Form D (17 CFR 239.500) at such times as required by state law.
- 3. The undersigned issuer hereby undertakes to furnish to the state administrators, upon written request, information furnished by the issuer to offerees.
- 4. The undersigned issuer represents that the issuer is familiar with the conditions that must be satisfied to be entitled to the Uniform limited Offering Exemption (ULOE) of the state in which this notice is filed and understands that the issuer claiming the availability of this exemption has the burden of establishing that these conditions have been satisfied.

The issuer has read this notification and knows the contents to be true and has duly caused this notice to be signed on its behalf by the undersigned duly authorized person.

Issuer (Print or Type) K2 STB Fund, Ltd.	Signature 	Date March 13, 2009
Name of Signer (Print or Type) John T. Ferguson	Title of Signer (Print or Type) Director	

Instruction:

Print the names and title of the signing representative under his signature for the state portion of this form. One copy of every notice on Form D must be manually signed must be photocopies of the manually signed copy or bear typed or printed signatures.

APPENDIX

1 State	2 Intend to sell to non-accredited investors in State (Part B – Item 1)		3 Type of security and aggregate offering price offered in state (Part C – Item 1)	4 Type of investor and amount purchased in State (Part C – Item 2)				5 Disqualification under State ULOE (if yes, attach explanation of waiver granted) (Part E – Item 1)	
	Yes	No		Shares	Number of Accredited Investors	Amount	Number of Non-Accredited Investors	Amount	Yes
AL									
AK									
AZ									
AR									
CA									
CO									
CT									
DE									
DC									
FL									
GA									
HI									
ID									
IL									
IN									
IA									
KS									
KY									
LA									
ME									
MD									
MA									
MI									
MN									
MS									
MO									
MT									
NE									
NV									
NH									
NJ									
NM									

APPENDIX

1	2		3	4				5	
	Intend to sell to non-accredited investors in State (Part B – Item 1)			Type of security and aggregate offering price offered in state (Part C – Item 1)	Type of investor and Amount purchased in State (Part C – Item 2)		Disqualification under State ULOE (if yes, attach explanation of waiver granted) (Part E – Item 1)		
State	Yes	No	Shares	Number of Accredited Investors	Amount	Number of Non-Accredited Investors	Amount	Yes	No
NY		X	\$500,000,000	1	\$40,000,000	0	\$0		X
NC									
ND									
OH									
OK									
OR									
PA									
RI									
SC									
SD									
TN									
TX									
UT									
VT									
VA									
WA									
WV									
WI									
WY									

EXHIBIT “C”

C&E
936

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Form **990-T**

Exempt Organization Business Income Tax Return
(and proxy tax under section 6033(e))

OMB No 1545-0687
2016

For calendar year 2016 or other tax year beginning 9/01, 2016, and ending 8/31, 2017

Information about Form 990-T and its instructions is available at www.irs.gov/form990t.
Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

Open to Public Inspection for 501(c)(3) Organizations Only

Department of the Treasury
Internal Revenue Service

A <input type="checkbox"/> Check box if address changed	Print or Type WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA 625 RED MILLS ROAD WALLKILL, NY 12589	<input type="checkbox"/> Check box if name changed and see instructions	D Employer identification number (Employees' trust, see instructions) 11-1857820
B Exempt under section <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 408(e) <input type="checkbox"/> 220(e) <input type="checkbox"/> 408A <input type="checkbox"/> 530(a) <input type="checkbox"/> 529(a)		E Unrelated business activity codes (See instructions) 900099	

C Book value of all assets at end of year: **1,004,209,000**

F Group exemption number (See instructions.)

G Check organization type: 501(c) corporation 501(c) trust 401(a) trust Other trust

H Describe the organization's primary unrelated business activity:
INVESTMENT ACTIVITIES

I During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? Yes No
If 'Yes,' enter the name and identifying number of the parent corporation

J The books are in care of: **GERALD F SIMONIS** Telephone number: **(718)-560-7222**

Part II Unrelated Trade or Business Income		(A) Income	(B) Expenses	(C) Net
1 a	Gross receipts or sales			
b	Less returns and allowances			
c	Balance			
1c				
2	Cost of goods sold (Schedule A, line 7)			
3	Gross profit. Subtract line 2 from line 1c			
4a	Capital gain net income (attach Schedule D)			
4b	Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)			
4c	Capital loss deduction for trusts			
5	Income (loss) from partnerships and S corporations (attach statement) ST 1	-7,240.		
6	Rent income (Schedule C)			
7	Unrelated debt-financed income (Schedule E)			
8	Interest, annuities, royalties, and rents from controlled organizations (Schedule F)			
9	Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)			
10	Exploited exempt activity income (Schedule I)			
11	Advertising income (Schedule J)			
12	Other income (See instructions; attach schedule) SEE STATEMENT 2	1,597.		
13	Total. Combine lines 3 through 12	-5,643.	0.	-5,643.

Part III Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Except for contributions, deductions must be directly connected with the unrelated business income.)			
14	Compensation of officers, directors, and trustees (Schedule K)		
15	Salaries and wages		
16	Repairs and maintenance		
17	Bad debts		
18	Interest (attach schedule)		
19	Taxes and licenses		80,000.
20	Charitable contributions (See instructions for limitation rules)		
21	Depreciation (attach Form 4562)		
22	Less depreciation claimed on Schedule A and elsewhere on return		
22b			
23	Depletion		
24	Contributions to deferred compensation plans		
25	Employee benefit programs		
26	Excess exempt expenses (Schedule I)		
27	Excess readership costs (Schedule J)		
28	Other deductions (attach schedule)		
29	Total deductions. Add lines 14 through 28		80,000.
30	Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13		-85,643.
31	Net operating loss deduction (limited to the amount on line 30)		
32	Unrelated business taxable income before specific deduction. Subtract line 31 from line 30		-85,643.
33	Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions)		
34	Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is greater than line 32, enter the smaller of zero or line 32		-85,643.

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JUL 19 2018
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IRS-OG

SCANNED SEP 10 2018

67 3

Part III Tax Computation

35 Organizations Taxable as Corporations. See instructions for tax computation.
 Controlled group members (sections 1561 and 1563) check here See instructions and:
a Enter your share of the \$50,000, \$25,000, and \$9,925,000 taxable income brackets (in that order):
 (1) \$ _____ (2) \$ _____ (3) \$ _____
b Enter organization's share of: (1) Additional 5% tax (not more than \$11,750) \$ _____
 (2) Additional 3% tax (not more than \$100,000) \$ _____
c Income tax on the amount on line 34 **35 c** 0.

36 Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on the amount on line 34 from: Tax rate schedule or Schedule D (Form 1041) **36**

37 Proxy tax. See instructions. **37**

38 Alternative minimum tax. **38**

39 Tax on Non-Compliant Facility Income. See instructions. **39**

40 Total. Add lines 37, 38 and 39 to line 35c or 36, whichever applies **40** 0.

Part IV Tax and Payments

41 a Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) **41 a**

b Other credits (see instructions) **41 b**

c General business credit. Attach Form 3800 (see instructions) **41 c**

d Credit for prior year minimum tax (attach Form 8801 or 8827) **41 d**

e Total credits. Add lines 41a through 41d **41 e** 0.

42 Subtract line 41e from line 40 **42** 0.

43 Other taxes. Check if from: Form 4255 Form 8611 Form 8697 Form 8866
 Other (attach schedule) **43**

44 Total tax. Add lines 42 and 43 **44** 0.

45 a Payments: A 2015 overpayment credited to 2016 **45 a**

b 2016 estimated tax payments **45 b**

c Tax deposited with Form 8868 **45 c**

d Foreign organizations: Tax paid or withheld at source (see instructions) **45 d**

e Backup withholding (see instructions) **45 e**

f Credit for small employer health insurance premiums (Attach Form 8941) **45 f**

g Other credits and payments. Form 2439 Form 4136 Other _____ Total **45 g**

46 Total payments. Add lines 45a through 45g **46** 0.

47 Estimated tax penalty (see instructions). Check if Form 2220 is attached **47**

48 Tax due. If line 46 is less than the total of lines 44 and 47, enter amount owed **48**

49 Overpayment. If line 46 is larger than the total of lines 44 and 47, enter amount overpaid **49**

50 Enter the amount of line 49 you want: **Credited to 2017 estimated tax** **Refunded** **50**

Part V Statements Regarding Certain Activities and Other Information (see instructions)

51 At any time during the 2016 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If YES, the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If YES, enter the name of the foreign country here **SEE STMT 3** **Yes** **No**

52 During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If YES, see instructions for other forms the organization may have to file **Yes** **No**

53 Enter the amount of tax-exempt interest received or accrued during the tax year \$ 0 **Yes** **No**

Sign Here Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Signature of officer: *Daniel Feyka* Date: 7/9/2018 Title: SECRETARY May the IRS discuss this return with the preparer shown below (see instructions)? **Yes** **No**

Paid Preparer Use Only

Print/Type preparer's name: DANIEL FEYKA Preparer's signature: DANIEL FEYKA Date: _____ Check if self-employed PTIN: P00386276

Firm's name: GERALD F. SIMONIS CPA Firm's EIN: _____

Firm's address: 800 RED MILLS ROAD Phone no: 347-613-6725
WALKILL, NY 12589

Schedule A – Cost of Goods Sold. Enter method of inventory valuation ▶

1 Inventory at beginning of year	1		6 Inventory at end of year	6			
2 Purchases	2		7 Cost of goods sold. Subtract line 6 from line 5. Enter here and in Part I, line 2	7			
3 Cost of labor	3					Yes	No
4a Additional section 263A costs (attach schedule)	4a						
b Other costs (attach sch)	4b		8 Do the rules of section 263A (with respect to property produced or acquired for resale) apply to the organization?				
5 Total. Add lines 1 through 4b	5						

Schedule C – Rent Income (From Real Property and Personal Property Leased With Real Property) (see instructions)

1 Description of property		
(1)		
(2)		
(3)		
(4)		
2 Rent received or accrued		
(a) From personal property (if the percentage of rent for personal property is more than 10% but not more than 50%)	(b) From real and personal property (if the percentage of rent for personal property exceeds 50% or if the rent is based on profit or income)	3(a) Deductions directly connected with the income in columns 2(a) and 2(b) (attach schedule)
(1)		
(2)		
(3)		
(4)		
Total	Total	
(c) Total income. Add totals of columns 2(a) and 2(b). Enter here and on page 1, Part I, line 6, column (A) ▶		(b) Total deductions. Enter here and on page 1, Part I, line 6, column (B) ▶

Schedule E – Unrelated Debt-Financed Income (see instructions)

1 Description of debt-financed property		2 Gross income from or allocable to debt-financed property	3 Deductions directly connected with or allocable to debt-financed property	
			(a) Straight line depreciation (attach sch)	(b) Other deductions (attach schedule)
(1)				
(2)				
(3)				
(4)				
4 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	5 Average adjusted basis of or allocable to debt-financed property (attach schedule)	6 Column 4 divided by column 5	7 Gross income reportable (column 2 x column 6)	8 Allocable deductions (column 6 x total of columns 3(a) and 3(b))
(1)		%		
(2)		%		
(3)		%		
(4)		%		
Totals			Enter here and on page 1, Part I, line 7, column (A).	Enter here and on page 1, Part I, line 7, column (B)
Total dividends-received deductions included in column 8				

BAA

Schedule F – Interest, Annuities, Royalties, and Rents From Controlled Organizations (see instructions)

1 Name of controlled organization	2 Employer identification number	Exempt Controlled Organizations			
		3 Net unrelated income (loss) (see instructions)	4 Total of specified payments made	5 Part of column 4 that is included in the controlling organization's gross income	6 Deductions directly connected with income in column 5
(1)					
(2)					
(3)					
(4)					

Nonexempt Controlled Organizations

7 Taxable income	8 Net unrelated income (loss) (see instructions)	9 Total of specified payments made	10 Part of column 9 that is included in the controlling organization's gross income	11 Deductions directly connected with income in column 10
(1)				
(2)				
(3)				
(4)				

Add columns 5 and 10. Enter here and on page 1, Part I, line 8, column (A).
 Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B).

Totals

Schedule G – Investment Income of a Section 501(c)(7), (9), or (17) Organization (see instructions)

1 Description of income	2 Amount of income	3 Deductions directly connected (attach schedule)	4 Set-asides (attach schedule)	5 Total deductions and set-asides (column 3 plus column 4)
(1)				
(2)				
(3)				
(4)				
		Enter here and on page 1, Part I, line 9, column (A)		Enter here and on page 1, Part I, line 9, column (B).

Totals

Schedule I – Exploited Exempt Activity Income, Other Than Advertising Income (see instructions)

1 Description of exploited activity	2 Gross unrelated business income from trade or business	3 Expenses directly connected with production of unrelated business income	4 Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute columns 5 through 7.	5 Gross income from activity that is not unrelated business income	6 Expenses attributable to column 5	7 Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
		Enter here and on page 1, Part I, line 10, column (A).	Enter here and on page 1, Part I, line 10, column (B).			Enter here and on page 1, Part II, line 26.

Totals

Schedule J – Advertising Income (See instructions)

Part I Income From Periodicals Reported on a Consolidated Basis

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5 Circulation income	6 Readership costs	7 Excess readership costs (col. 6 minus col. 5, but not more than col. 4).
(1)						
(2)						
(3)						
(4)						

Totals (carry to Part II, line (5))

Part II Income From Periodicals Reported on a Separate Basis (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

1 Name of periodical	2 Gross advertising income	3 Direct advertising costs	4 Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5 Circulation income	6 Readership costs	7 Excess readership costs (col. 6 minus col. 5, but not more than col. 4).
(1)						
(2)						
(3)						
(4)						
Totals from Part I ▶						
Totals, Part II (lines 1-5) ▶	Enter here and on page 1, Part I, line 11, column (A)	Enter here and on page 1, Part I, line 11, column (B).				Enter here and on page 1, Part II, line 27.

Schedule K – Compensation of Officers, Directors, and Trustees (see instructions)

1 Name	2 Title	3 Percent of time devoted to business	4 Compensation attributable to unrelated business
		%	
		%	
		%	
		%	
Total. Enter here and on page 1, Part II, line 14 . ▶			

STATEMENT 1
FORM 990-T, PART I, LINE 5
INCOME (LOSS) FROM PARTNERSHIPS AND S CORPORATIONS

NAME	GROSS INCOME	DEDUCTIONS	INCOME (LOSS)
RC GLOBAL ENERGY IV LP	\$ -1,823.	\$ 0.	\$ -1,823.
TENASKA TPF II-A, L.P.	-5,417.	0.	-5,417.
		TOTAL	<u>\$ -7,240.</u>

STATEMENT 2
FORM 990-T, PART I, LINE 12
OTHER INCOME

UNIVERSITY HOTEL DEVELOPMENT K-1	\$ 1,597.
	TOTAL <u>\$ 1,597.</u>

STATEMENT 3
FORM 990-T, PART V, LINE 51
STATEMENTS REGARDING CERTAIN ACTIVITIES AND OTHER INFORMATION

ANTIGUA
 ARUBA
 BOLIVIA
 CANADA
 COSTA RICA
 CURACAO (NETHERLANDS ANTILLES)
 FINLAND
 GEORGIA
 HONDURAS
 INDIA
 ISRAEL
 MADAGASCAR
 NICARAGUA
 SIERRA LEONE
 SWITZERLAND
 THAILAND
 ZAMBIA
 ZIMBABWE

EXHIBIT “D”

AFFIDAVIT OF DANNY BLAND

I, DANNY BLAND., being duly sworn, deposes and says:

1. I am over 21 years of age, of sound mind, and competent to make this affidavit.
2. I have personal knowledge of the matters set forth below.
3. I am the Secretary and Treasurer of Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower-PA”) and have been authorized by its Board of Directors to provide this affidavit.
4. Watch Tower-PA is a 501(c)(3) nonprofit corporation organized under the laws of the State of Pennsylvania with offices in Warwick, New York.
5. Watch Tower-PA has a limited membership of up to 500 persons. Watch Tower-PA has no employees.
6. Watch Tower-PA is not the faith of Jehovah’s Witnesses, nor is it the organizational head of the faith.
7. Watch Tower-PA does not have any parent or any subsidiary corporations, wholly-owned or otherwise.
8. Watch Tower-PA supports the faith of Jehovah’s Witnesses by obtaining and holding copyright to religious materials (print, electronic, and digital media) used by Jehovah’s Witnesses, by providing international humanitarian aid to victims of natural and man-made disasters, and by assisting branch offices of Jehovah’s Witnesses worldwide (akin to national/regional offices) with construction and operational support.
9. Watch Tower-PA does not have, nor has it ever had, any business office in the State of Montana.
10. Watch Tower-PA does not have agents, employees, officers, or directors residing in the State of Montana.

11. Watch Tower-PA does not direct any type of commercial activity towards the State of Montana.

12. Watch Tower-PA does not form, organize, or oversee congregations of Jehovah's Witnesses in the State of Montana or any other location.

13. Watch Tower-PA does not appoint, remove, or otherwise oversee elders in congregations of Jehovah's Witnesses in the State of Montana or any other location.

I declare to the best of my knowledge that the information herein is true and correct.

Dated: 1/26/2017



Danny Bland, Affiant

NOTARY ACKNOWLEDGMENT

STATE OF NEW YORK

COUNTY OF ORANGE

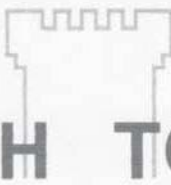
On this 26th day of January in the year 2017 before me, the undersigned, personally appeared **DANNY BLAND**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed above.



DAVID PETRUS
NOTARY PUBLIC-STATE OF NEW YORK
No. 01PE6169633
Qualified in Kings County
My Commission Expires 06/25/19



EXHIBIT “E”



WATCH TOWER

BIBLE AND TRACT SOCIETY OF PENNSYLVANIA

THE RIDGEWAY LONDON NW7 1RN ENGLAND

TELEPHONE 0181-906 2211

November 1, 1995

TO ALL BODIES OF ELDERS IN BRITAIN

Dear Brothers:

We are pleased to outline below some guidelines that we hope will be helpful to you in protecting victims of child abuse and in dealing with a brother or sister in the congregation who has been guilty of sexually abusing a child.

When a member of the congregation is accused of child molestation, the elders should contact the Society's Legal Department immediately. Often-times the parent, the guardian, or the accused person himself will be moved to report an accusation to the proper authorities. In this way confidentiality is not violated. In any event, when it is established that a member of the congregation is guilty of child abuse, appropriate steps should be taken in keeping with initial direction from the Society's Legal Department.

Additionally, steps should be taken to protect the child, or other children, from further sexual abuse. Obviously, parents would be keenly interested in taking adequate precautions in this regard. Helpful information along these lines can be reviewed in the January 22, 1985, and October 8, 1993, issues of *Awake!* Loving elders, too, will want to act in a way that demonstrates their protective care, since the word "overseer" carries the thought of one who watches over, a guardian, a shepherd of the flock. (See "*Pay Attention to Yourselves and to All the Flock*," pages 90 and 93.) Thus, they would want to take steps to protect a child abuse victim when a judicial committee determines that the child molester is repentant and will remain a member of the Christian congregation. The same concern would be shown when a paedophile is disfellowshipped and later cleans up his life and is reinstated.

It would be appropriate to talk very frankly to a former child abuser, strongly cautioning him as to the dangers of hugging or holding children on his lap and that he should never be in the presence of a child without another adult being present. This may prevent putting that one in the way of temptation or unfounded accusation. At the same time, it is good to remember that the Bible, at Matthew 12:31 and 1 Corinthians 6:9-11, shows it is possible for a person to stop his or her wrongful course, repent, and thereafter live in harmony with God's righteous standards. This is true of all wrongdoers—even a former child abuser.

To All Bodies of Elders in Britain

November 1, 1995

Page 2

While it is unscriptural to say that a former child abuser could never enjoy exemplary privileges of service in the congregation, certainly the elders will want to be very cautious, especially when one had repeatedly engaged in this kind of wrongdoing or had been disfellowshipped for such an offence. Before extending privileges, therefore, it is necessary that one would meet the qualification of having a fine testimony from individuals inside and outside the congregation. This means that he must have lived down the reproach which resulted from his wrongdoing. Generally, it will take a considerable number of years to achieve such irreprehensibility depending on the notoriety involved. So it would be up to the elders to determine whether such a one is extended privileges, taking into account all factors in each individual case. (1 Timothy 3:7) At any rate, this should never be done hastily. Considerable time should always pass before a former child abuser is used, if ever.

What if a former child abuser moves to another congregation? The Congregation's Publisher Record card(s) for that person should be sent to the new congregation, along with a letter of introduction. If he is under judicial restrictions, the committee in his former congregation should clearly and discreetly inform the elders in the new congregation about the problem, outlining the counsel given and the restrictions imposed and pointing out what they have been doing to monitor and assist him. Even if years have passed and the individual is no longer restricted but there is still some concern (as outlined in the preceding paragraph), the elders in the new congregation should be informed.

It is hoped that the above direction will help you brothers in handling matters in the congregation so as to protect victims and potential victims from child abuse, and at the same time, balance justice with mercy. With this letter we send our warm Christian love and greetings.

Your brothers,

Watch Tower B. & J. Society

OF PENNSYLVANIA

Plaintiff, Alexis Nunez, for her Complaint against the Defendants, alleges as follows:

PARTIES

1. Plaintiff, Alexis Nunez, is a citizen of and is domiciled in the state of Wyoming.

2. At all material times, Defendant **Watchtower Bible and Tract Society of New York, Inc.** (“Watchtower NY”) is and was a New York corporation authorized to conduct and conducting business in the State of Montana, with its principal place of business at 25 Columbia Heights, Brooklyn, New York 11201. Watchtower NY may be served with process through Philip Brumley at 100 Watchtower Drive (2891 Route 22), Patterson, NY 12563. Watchtower NY has appeared and answered.

3. At all material times, Defendant **Watchtower Bible and Tract Society of Pennsylvania, Inc.** (“Watchtower PA”) is and was a Pennsylvania corporation authorized to conduct and conducting business in the State of Montana, with its principal place of business at 1630 Spring Run Road Extension, Coraopolis, Pennsylvania 15108. Alternatively, Watchtower PA may be served with process through Philip Brumley at 100 Watchtower Drive (2891 Route 22), Patterson, NY 12563.

4. At all material times, Defendant **Christian Congregation of Jehovah’s Witnesses** (“CCJW”) is a corporation organized and existing under the laws of the State of New York, which is authorized to conduct, and is conducting business in the State of Montana, with its principal place of business at 100 Watchtower Drive, Patterson, New York 12563-9204. CCJW may be served through its registered agent Kurt Lee at 21 Thunder Ridge Road, Clancy, Montana, 59634, United States. CCJW has appeared and answered.

5. At all material times, Defendant **Thompson Falls Congregation of Jehovah’s Witnesses** (“Thompson Falls Congregation”) is and was a legal entity located in Thompson Falls, Sanders

County, Montana and a part of the organization of Jehovah's Witnesses. The principal place of business for Defendant Thompson Falls Congregation is 1197 Mount Silcox Drive, Thompson Falls, Montana 59873. Thompson Falls Congregation has appeared and answered.

6. Defendants Watchtower NY, Watchtower PA, CCJW, and Thompson Falls Congregation are collectively referred to herein as the "Watchtower Defendants" because each is the agent and alter ego of each other and operate as a single business enterprise. Each defendant was acting within the scope and course of his or its authority as an agent, servant, and/or alter ego of the other and each of them engaged in, joined in and conspired with the other wrongdoers in carrying out the tortious and unlawful activities alleged in this complaint. Each Watchtower Defendant is engaged in a joint venture / joint enterprise and liability is based on the actions of the agents for the venture / enterprise.

JURISDICTION AND VENUE

7. Pursuant to Mont. Code Ann. § 3-5-302(1)(b), this Court has jurisdiction over this civil matter. Pursuant to Mont. R. Civ. P. 4, this Court has jurisdiction over Defendants because Defendants committed acts resulting in the accrual within Montana of a tort action and because Defendant Thompson Falls Congregation may be found within the state of Montana.

8. Pursuant to Mont. Code Ann. §§ 25-2-118 and 25-2-122, venue is proper in the Twentieth Judicial District – Sanders County because it is the county in which the torts were committed and because it is the county of Defendant Thompson Falls Congregation's residence.

FACTUAL BACKGROUND

9. Watchtower Defendants comprise a hierarchical organization made up of different corporations and other entities. The "Governing Body" establishes policies and dictates practices for Watchtower Defendants, and operates through various corporate entities including Watchtower

NY, Watchtower PA and CCJW. Collectively, these Defendants (along with other entities) make up Jehovah's Witnesses.

10. Besides Watchtower NY, Watchtower PA, and CCJW, Jehovah's Witnesses use dozens of legal entities in various countries.

11. The Governing Body is a small group of men called Elders who sit at the top of the hierarchical structure of the Jehovah's Witnesses and Watchtower Defendants. A Governing Body Elder is the highest rank within the Church that can be held by a Jehovah's Witness. Authority flows downward from the Governing Body to the local levels of the Church.

12. At the local level, members of the Church are divided into Congregations. Congregations are run on a daily basis by a Body of Elders.

13. Male baptized Publishers who meet certain requirements may be appointed as Ministerial Servants. Ministerial Servants serve the Congregation and aid the Elders in their responsibilities. To be appointed as a Ministerial Servant, a person must be a male baptized Publisher in good standing. The Body of Elders of the local church identifies potential candidates and determines whether they are suitable and if they live their life in accordance with appropriate morals. Once the Body of Elders has identified a candidate, it makes a recommendation to the Governing Body and/or Watchtower Defendants, which has the ultimate authority as to whether to approve the candidate to become a Ministerial Servant.

14. A person holding the position of Ministerial Servant is an agent of the Defendants.

15. To be appointed as an Elder, a person must be a Ministerial Servant in good standing or have served as an Elder in another Congregation. The Body of Elders of the local church identifies potential candidates and determines whether they are suitable and if they live their life in accordance with appropriate morals. Once the Body of Elders has identified a candidate, it makes

a recommendation to Governing Body and/or Watchtower Defendants, which has the ultimate authority as to whether to approve the candidate to become an Elder.

16. A person holding the position of Elder is an agent of the Defendants.

17. The Watchtower Defendants exercise control of the Church, the elders, and the running of the local Congregations.

18. The Watchtower Defendants publish a series of handbooks that it distributes to Elders and chooses to keep secret from other Jehovah's Witnesses and the public. These handbooks provide instruction to Elders regarding the day-to-day administration of the Church, such as the scheduling of congregation meetings, as well as more specific instruction regarding how to respond to allegations of wrongdoing, when to convene a judicial committee, and how to handle the procedure.

19. The Watchtower Defendants also provide periodic instruction to local Congregations through letters addressed to "All Bodies of Elders." These letters cover a broad spectrum of topics, ranging from standardizing the recordkeeping practices of all Congregations to responding to complaints of childhood sexual abuse.

20. The Watchtower Defendants establish processes for the discipline of members accused of wrongdoing. Defendants teach congregants to bring problems to the Elders to be resolved rather than to seek intervention from outside the Church.

21. In practice, when a congregant commits a wrongdoing, such as the sexual abuse of a child, that matter may be brought to an Elder to be resolved. Jehovah's Witness policy requires Elders to investigate such a claim. If there are two witnesses to the wrongdoing or if the accused confesses his wrongdoing, the Elders will convene a Judicial Committee. Even in cases of child molestation,

if there are not at least two eyewitnesses to the abuse and the accused denies the wrong, the Elders take no action.

22. If a Judicial Committee is convened, the two Elders who originally investigated the wrongdoing will be joined by a third Elder, who will hear the case and impose punishment on the wrongdoer. Possible outcomes of a Judicial Committee range from a private reproof to disfellowship. Private reproof is a private censorship of the wrongdoer that generally results in a limitation of the wrongdoer's privileges to engage in Field Service for a short period of time. The Elders do not make an announcement to the Congregation when a wrongdoer is privately reproofed. Disfellowship is expulsion from the Congregation. When a wrongdoer is disfellowshipped, the Elders make an announcement to the Congregation that the wrongdoer is no longer one of Jehovah's Witnesses, but they give no details regarding the nature of the wrongdoing. A person who is disfellowshipped can seek reinstatement into the Congregation by written request to the Elders.

23. Even during the time that a member is disfellowshipped, the member is allowed to continue to attend services and meetings at the Kingdom Hall.

24. Through their rules and policies, the Watchtower Defendants assumed a duty to protect children in their organization, including Plaintiff.

25. Plaintiff Alexis Nunez was raised in a Jehovah's Witness Family and attended services at Defendant Thompson Falls Congregation.

26. Max Reyes was a baptized member of the Thompson Falls Congregation. While attending the congregation, he molested his stepchildren and step grandchildren, including Plaintiff Nunez.

27. In 2004, his stepson, Peter McGowan notified elders, agents of Defendants, that Reyes was a pedophile and has sexually abused him.

28. In 2004, his stepdaughter Holly McGowan wrote to elders, agents of Defendants, notifying them that Reyes was a pedophile and has sexually abused her.

29. Elders, agents of Defendants, met with Reyes and his wife. Reyes notified elders, agents of Defendants, that he was a pedophile and sexually abused children.

30. At the same time elders were notified by Reyes, his stepson, and stepdaughter that Reyes was a pedophile, those same elders observed Plaintiff Nunez attending church with Reyes and staying in his home.

31. The elders “disfellowshipped” Reyes for sexually abusing children but allowed him to continue to attend church. They failed to notify church members why he was disfellowshipped. And, they took no action to protect Plaintiff Nunez, but continued to cover up his crimes against children and permitted him to continue molesting Plaintiff Nunez.

32. Reyes continued to molest Plaintiff Nunez after elders were notified and he was disfellowshipped.

33. Reyes asked to be reinstated in the organization. He was reinstated, continued to attend as a member, and continued molesting Plaintiff Nunez.

34. Prior to the molestation of Plaintiff, and continuing thereafter, the Defendants employed an institutional policy for responding to allegations of childhood sexual abuse. One component of that policy mandated that Elders who were informed of allegations of childhood sexual abuse against a member voluntarily undertake a duty to vigilantly monitor the molester for the safety and protection of children in the Congregation. Since the Defendants possessed knowledge of Reyes’ prior molestation, the Defendants assumed an obligation to monitor Reyes and protect young girls

in the Congregation, including Plaintiff Nunez, from his predations. The Defendants failed in this regard.

35. Throughout his disfellowship and after his reinstatement, Reyes continued to sexually abuse and molest Plaintiff Nunez on a weekly basis. The abuse continued until approximately 2007, when Plaintiff Nunez was ten years old.

CAUSES OF ACTION AGAINST DEFENDANTS

Count I - Negligence

36. Plaintiffs adopt and incorporate by reference each and every allegation set forth above.

37. Defendants have a duty to exercise reasonable care in matters relating to the prevention and investigation of sexual abuse by their agents. Defendants have a duty to exercise reasonable care to prevent the sexual abuse of minor children that attend services. Defendants have a duty to protect children that are exposed to known pedophiles within their organization.

38. Defendants negligently failed to exercise reasonable care by:

- a. failing to create and implement policies and procedures to prevent the sexual abuse of children, including Plaintiff;
- b. failing to train its employees and agents to prevent, identify, investigate, respond to, or report the sexual abuse of children;
- c. failing to conduct a proper and thorough investigation of Reyes;
- d. failing to properly and thoroughly investigate and respond to complaints regarding Reyes' criminal behavior involving minor children;
- e. failing to warn and inform children and families of Reyes' sexual abuse involving minor children;
- f. failing to report suspected abuse and neglect by Reyes in breach of common law;
- g. failing to supervise its employees and agents and otherwise monitor the conduct of Reyes; and

- h. retaining Reyes in the organization at a time when they knew or should have known of his propensities to engage in acts of sexual abuse against Plaintiffs and other young children.

39. Defendants knew, or by the exercise of ordinary and prudent care, should have known that the above-referenced acts of negligence posed an unreasonable risk of harm to Plaintiff.

40. Defendants' negligence, singularly and collectively and joint and severally, proximately caused Plaintiff's personal injuries, emotional trauma, and damages.

Count II - Respondeat Superior

41. Plaintiffs adopt and incorporate by reference each and every allegation set forth above.

42. The Defendants are vicariously liable for the torts, negligence, and damages attributed to individuals who were employees, officers, agents and/or were acting in the course and scope of their employment with the Defendants at all relevant times.

43. As a direct and proximate result of the Defendants' wrongful actions, Plaintiff suffered serious personal injury and mental anguish and trauma.

Count III – Malice - Exemplary and Punitive Damages

44. Plaintiff adopts and incorporates by reference each and every allegation set forth above.

45. Defendants had knowledge of facts or intentionally disregarded facts that created a high probability of injury to Plaintiff, yet the Defendants deliberately proceeded to act in conscious or intentional disregard or with indifference to the high probability of injury to Plaintiff.

46. The sexual abuse and molestation by Reyes and Plaintiff's resulting damages were directly and proximately caused by the Defendants' gross negligence and actual malice.

47. Based on their acts and omissions, the Defendants are liable to Plaintiff for exemplary and punitive damages, pursuant to Mont. Code. Ann. § 27-1-221.

Count IV – Joint Venture / Enterprise Liability

48. Defendants are an association of two or more entities carrying on a single business enterprise for profit.

49. Defendant have an express and/or implied agreement or contract creating the joint venture / enterprise; a common purpose; community of interest; and an equal right to control the venture.

PRAYER FOR RELIEF

Wherefore, Plaintiff request the following relief:

- (1) For compensatory damages in amounts to be proven at trial, including:
 - a. reasonable and necessary medical, psychiatric, and psychological expenses incurred in the past;
 - b. reasonable and necessary medical, psychiatric, and psychological expenses reasonably likely to be incurred in the future;
 - c. mental anguish in the past;
 - d. mental anguish in the future;
 - e. physical and mental impairment/disfigurement in the past;
 - f. physical and mental impairment/disfigurement in the future;
 - g. physical and psychological pain/mental anguish suffered in the past;
 - h. physical and psychological pain/mental anguish suffered in the future;
 - i. loss of enjoyment and quality of life in the past;
 - j. loss of enjoyment and quality of life in the future; and
 - k. loss of established course of life.
- (2) For an award of punitive damages
- (3) For pre-judgment and post-judgment interest to the extent allowed by law;

(4) For an award of costs; and

(5) For such other and further relief as this Court deems just and equitable.

DATED this 6th day of February, 2020.

Attorneys for Plaintiffs:

NIX PATTERSON, LLP

GALLIK, BREMER & MOLLOY, P.C.

By: 
James P. Molloy