

Exhibit G

MARIO F. MORENO

Page 1

1 SUPERIOR COURT OF CALIFORNIA
2 COUNTY OF SAN DIEGO - CENTRAL COURT

-----X

3 KENNETH DELGADO,

4 Plaintiff,

5 Case No. 37-2013-00048375

6 -against-

7 LAS LOMAS SPANISH CONGREGATION OF
8 JEHOVAH'S WITNESSES, SAN DIEGO, CA, INC.,
9 and DOES 1 TO 20, inclusive,

10 Defendants.

-----X

11
12
13
14
15
16 Deposition of Mario F. Moreno, Esq.

17 Tuesday, February 18, 2014

18 Brooklyn, New York

19
20
21
22
23 **CERTIFIED
TRANSCRIPT**

24 REPORTED BY:

25 Helen Mendlowich



MARIO F. MORENO

Page 215

1 CCJW directs the service department or --

2 A. Who direct the service department?

3 Q. CCJW directs the service department or the
4 service department directs CCJW?

5 A. Neither.

6 Q. How does that relationship work out, that
7 legal relationship?

8 A. The service department communicates
9 through the CCJW. That's the corporation they use.
10 The officers and directors of the CCJW do not
11 oversee or supervise the activities of the service
12 department. That's done by Gary Breaux, the
13 overseer, and his assistants.

14 Q. Who is also an officer, director of
15 Watchtower?

16 A. Or CCJW. I'm not sure which. Gary
17 Breaux, yes.

18 Q. So there is a connection between the
19 service department and a line of control or a line
20 of authority, I should say?

21 A. The answer is no.

22 Q. The service department, how many members
23 is that composed of?

24 A. Mr. Jefferson would know that better. My
25 estimate would be about 140, give or take 20.



MARIO F. MORENO

Page 218

1 Q. The Branch Committee exercises oversight
2 over the legal department?

3 A. That's correct.

4 Q. Over the service department?

5 A. Correct.

6 In the case of the legal department, I
7 would just say, with respect to our United States
8 work, you've got the Branch Committee.

9 Q. Right.

10 A. And I say that because we have work in
11 other countries.

12 Q. And over the writing department; is that
13 correct?

14 A. No. The Branch Committee does not oversee
15 the writing department. The governing body does,
16 the writing committee of the governing body does.

17 Q. Is the writing committee composed of
18 multiple departments in the U. S. Branch?

19 A. No. The writing committee is composed of
20 three or four members of the governing body -- you
21 said the writing committee, right?

22 Q. Mm-hm.

23 A. The writing committee is composed of about
24 three or four member of the governing body and
25 probably about -- roughly, four assistants.

