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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN DIEGO**
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11 John Dorman, Individually, and Joel
Gamboa, Individually,

12 Plaintiffs,

13 vs.
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15 Defendant Doe 1, La Jolla Church;
16 Defendant Doe 2, Linda Vista Church;
17 Defendant Doe 3, Supervisory Organization;
18 Defendant Doe 4, Perpetrator; and Does 5
through 100,

19 Defendants.
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Case No: 37-2010-00092450-CU-PO-CTL

**PLAINTIFF JOEL GAMBOA'S
NOTICE OF LODGMENT IN
SUPPORT OF HIS OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT**

**Date: 12-16-11
Time: 10:30 a.m.
Judge: Steven R. Denton
Dept: C-73
Trial: 1-27-12**

1 Plaintiff Joel Gamboa hereby lodges the following documents with his consolidated
2 opposition to the three motions for summary judgment of Defendants:

3 Exhibit 1: True and correct copies of pages 14, 15, 16, 17, 18, 19, 20, 21, 22, 44 and 45 of
4 the deposition of Dennis Palmer.

5 Exhibit 2: A true and correct copy of the declaration of William H. Bowen.

6 Exhibit 3: True and correct copies of pages 12, 13, 14, 17, 18, 19, 21, 24, 32, 37, 38, 39, 40,
7 41, and 42 of the deposition of Ramon Preciado.

8 Exhibit 4: A true and correct copy of the stipulation executed by the parties on October 19,
9 2011 entitled "Stipulation re foundation of documents; identification of
10 Defendants; and agency of individuals in specified positions."

11 Exhibit 5: True and correct copies of pages 12, 13, 14, 15, 16, 18, 24, 25, 48, 49, 50 51, 52,
12 78, 81, 82, 83, 85, 86, 89, 90, 91, 92, 104, 105, 106, 107, 108, 109, 110, 124, 133,
13 134, 135, 137, 138, 139, 140, and 141 of the deposition of Gonzalo Campos.

14 Exhibit 6: A true and correct copy of the Declaration of Manuela Dorman.

15 Exhibit 7: A true and correct copy of a letter from the Service Committee of the Body of
16 Elders of the Playa Pacifica Spanish Congregation (formerly La Jolla Spanish
17 Congregation) dated March 29, 1995. This letter was produced to Plaintiffs in
18 discovery in the above-captioned action. The letter was originally written in
19 Spanish, and the copy produced was a poor quality copy. Plaintiffs have therefore
20 also included in this Exhibit a certified Spanish to English translation of the
21 document provided by Defense Counsel.

22 Exhibit 8: True, correct and redacted copies of pages 10, 11, 12, 13, 14, 15, and 16 of the
23 deposition of John Doe taken in this action. John Doe is not the true name of the
24 deponent, but is instead a fictitious name adopted by Plaintiffs to protect the
25 identity of John Doe, who was sexually assaulted by Gonzalo Campos.

26 Exhibit 9: True and correct copies of pages 12, 13, 14, 15 and 16 of the deposition of Marina
27 Ayllon taken in this action.

- 1 Exhibit 10: True and correct copies of pages 28, 29, 30, 31, 36, 37, 38, 40, 41 and 42 of the
2 deposition of Jesus Montijo.
- 3 Exhibit 11: True and correct copies of pages 28, 29, 34 and 35 of the deposition of Justino
4 Diaz.
- 5 Exhibit 12: A true and correct copy of a letter addressed to "Watchtower Society" and date
6 stamped November 20, 1986. This document was produced to Plaintiffs during
7 the discovery process. This document was originally written in Spanish, and both
8 the original version, as well as a certified Spanish to English translation are
9 attached as Exhibit 13.
- 10 Exhibit 13: A true and correct copy of page 39 of the deposition of Luis Rivera taken in this
11 action.
- 12 Exhibit 14: A true and correct copy of a letter written by Manuela and John Dorman dated
13 April 11, 1994. This letter was produced to Plaintiffs during the discovery
14 process.
- 15 Exhibit 15: A true and correct copy of a letter on letterhead of the Monmouth English
16 Congregation which is addressed to "Watchtower" and dated April 13, 1994. This
17 document was produced to Plaintiffs during the discovery process.
- 18 Exhibit 16: A true and correct copy of a letter dated June 9, 1994 that was produced to
19 Plaintiffs during the discovery process.
- 20 Exhibit 17: A true and correct copy of a letter written in Spanish on letterhead of the Playa
21 Pacifica Spanish Congregation and dated April 4, 1995. This document was
22 produced to Plaintiffs in the discovery process.
- 23 Exhibit 18: A true and correct copy of a June 9, 1995 letter titled "Notificacion de Expulsion
24 o Desasociacion." This document was produced to Plaintiffs during the discovery
25 process. Originally, the document was heavily redacted, however more complete
26 versions have since been produced. Included within Exhibit 7 are an original
27 version of the document drafted in Spanish. Also included are two certified
28

Spanish to English translations. The first translation was commissioned by Plaintiffs, and only contains the translated form letter. The second translation was provided to Plaintiffs by Defense Counsel and included a translation of only the content added to the form letter. Between the two translations, the entirety of this Exhibit is presented in English.

Exhibit 19: A true and correct copies of pages 40 and 41 of the deposition of Kevin Phillips taken in this action.

Exhibit 20: A true and correct copy of a draft letter written on letterhead of the Playa Pacifica Spanish Congregation and addressed to "Service Department Watchtower Bible and Tract Society of New York, Inc." and dated July 4, 1999. This document was produced to Plaintiffs during the discovery process and was originally written in Spanish. Exhibit 18 includes both the original Spanish version of the document, and a certified Spanish to English translation provided to Plaintiffs by Defense Counsel.

Exhibit 21: A true and correct copy of a letter written on letterhead of the Playa Pacifica Spanish Congregation and addressed to "Watchtower Bible & Tract Society" and dated November 13, 1996. This letter was produced to Plaintiff during the discovery process and was originally written in Spanish. Attached as Exhibit 11 are the original Spanish version of the letter as well as a certified Spanish to English translation produced to Plaintiffs by Defense Counsel.

Exhibit 22: A true and correct copy of a letter on Playa Pacifica Spanish Congregation letterhead which is addressed to "Service Department Watchtower Bible and Tract Society of New York, Inc." and dated July 24, 1999. This document was produced to Plaintiff during the discovery process and was originally written in Spanish. Attached as Exhibit 12 are the original Spanish version of the letter as well as a certified Spanish to English Translation produced to Plaintiffs by Defense Counsel.

- 1 Exhibit 23: A true and correct copy of a letter addressed to the Body of Elders of the Playa
2 Pacifica Spanish Congregation and dated June 5, 2000. The document was
3 produced to Plaintiffs during the discovery process and was originally written in
4 Spanish. Exhibit 19 includes both the original Spanish version of the document,
5 as well as a certified Spanish to English translation provided to Plaintiffs by
6 Defense Counsel.
- 7 Exhibit 24: A true and correct copy of a June 9, 1995 letter titled "Notificacion de Expulsion
8 o Desasociacion." This document was produced to Plaintiffs during the discovery
9 process. Included within Exhibit 20 is a copy of the document produced by
10 Defendant Watchtower and Bates Numbered WT000006. This document bears a
11 handwritten notation in the top right hand corner appearing in the original
12 Spanish. Also is a certified Spanish to English translation.
- 13 Exhibit 25: A true and correct copy of the Declaration of Joel Gamboa.
- 14 Exhibit 26: A true and correct copy of pages 25, 26, 27, 28, 29, 30, 31, 32, 39, 40, 43, 44, and
15 45 of the deposition of Joel Gamboa taken in this action.
- 16 Exhibit 27: A true and correct copy of the Declaration of Bertha Gomez Sandoval.
- 17 Exhibit 28: A true and correct copy of the Declaration of Dr. Robert Geffner, Ph.D., ABN,
18 ABPP.

19 Respectfully submitted,

20 THE ZALKIN LAW FIRM, P.C.

21
22 Dated: 12-2-11

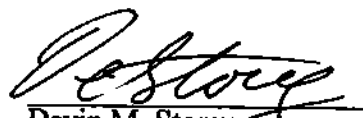
23 
24 Devin M. Storey
25 Attorney for Plaintiff
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27
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EXHIBIT 1



ORIGINAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

JOHN DORMAN,
individually, and JOEL
GAMBOA, individually,

Plaintiffs,

VB.

DEFENDANT DOE 1, LaJOLLA
CHURCH; DEFENDANT DOE 2,
LINDA VISTA CHURCH;
DEFENDANT DOE 3,
SUPERVISORY ORGANIZATION;
DEFENDANT DOE 4,
PERPETRATOR; and DOES 5
through 100,

Defendants.

) Case Number

137-2010-00092450-CU-PO-CTL

DEPOSITION OF DENNIS PALMER, called on behalf of the Plaintiffs, at 12555 High Bluff Drive, Suite 260, San Diego, California, on Monday, February 7, 2011, commencing at 10:12 a.m., before Judy Runes, California CSR No. 5874.

1 they wanted to come do it?

2 A Yeah, they would request, uh-huh.

3 Q If I were to say that a person was a
4 publisher, what would that mean?

5 A That would mean that they are authorized to go
6 out into field service, to -- yeah, to give studies or
7 go out into field service.

8 Q Are there specific requirements that are --
9 that must be met before someone is considered a
10 publisher?

11 A Yes.

12 Q What are those requirements?

13 A It would be someone who would be first and
14 foremost living in accordance with the Bible principles,
15 Christian Bible principles, and also someone that has a
16 good knowledge of Bible teaching.

17 Q Any other requirements?

18 A Well -- well, no. Also -- yeah, also they
19 have to -- they have to maintain -- I said that they
20 have to be living in accordance with the principles,
21 which means they have to -- we do hold publishers up to
22 a high enough standard because they -- you know,
23 they're -- they're in the community, representing
24 Jehovah's God. So we expect, you know, that they --
25 that they live up to that standard.

1 Q Okay. And if it comes to knowledge that
2 someone within the congregation -- that a person is not
3 living up to that standard, would their position or
4 their -- that privilege to be a publisher be withdrawn?

5 A Yes.

6 Q So is there -- is someone formally appointed a
7 publisher?

8 A Yes. Yeah, it's a -- it goes -- we do go
9 through a process, and there's a committee that approves
10 their -- their start as a publisher in the congregation.

11 Q Is this a committee of elders?

12 A Yes.

13 Q And is the committee's say-so the final word,
14 or does it have to be put to a vote of the elders in
15 general?

16 A No. The committee -- if it goes through the
17 process, the committee has the final word.

18 Q Okay. Other than the privilege of doing field
19 service, is there -- are there any responsibilities or
20 requirements for a publisher?

21 A No, that's the basic requirement, is -- is
22 publishing or preaching. That's -- that's the
23 privilege. And that's -- as I said, that's what we
24 expect. It's something that we want, but it's also
25 something that the individual wants. So aside from

1 that, you know, we would hope that the individual would
2 like to participate to a full extent in the activities
3 of the congregation, but it's not a requirement.

4 Q If I were to say the term -- or say that a
5 person is a pioneer, what would that mean?

6 A Okay. A pioneer is a publisher that has
7 agreed to spend a certain amount of time in the field
8 service.

9 Q So a publisher, in general, doesn't have a
10 requirement as to how many hours they're supposed to
11 spend in field service?

12 A That's correct.

13 Q But if a person is a pioneer, that pioneer
14 would have a requirement of how much time they're
15 supposed to spend?

16 A That's correct.

17 Q Okay. Are there specific requirements that
18 need to be satisfied to be a pioneer, above and beyond
19 those necessary to be a publisher?

20 A No. A pioneer has to be a publisher in good
21 standing and has to have shown the ability to be able
22 to, on a constant basis, set enough time aside to be
23 able to fulfill that requirement.

24 But, you know, as in any -- the situation with
25 a publisher, they have to be -- they have to be in good

1 standing in the congregation; otherwise, there's nothing
2 further than that.

3 Q Do you have to be appointed as a pioneer?

4 A Yes, you do.

5 Q Okay. And what's the process for becoming a
6 pioneer?

7 A The process for becoming a pioneer is a -- an
8 application which is submitted to the congregation. And
9 upon review -- again, by -- by the committee, if a -- if
10 the application is good, it has to be a serious
11 consideration as to be abilities and, again, the
12 standing of the person in the congregation. And if
13 everything is in order, then that person is appointed a
14 pioneer.

15 Q Okay. Are there different levels or different
16 kinds of pioneers?

17 A There are.

18 Q What are those levels?

19 A There is an auxiliary pioneer, which is more a
20 minimum of -- it's changed over the years, but at the --
21 at the moment, a minimum pioneer agrees to put 50 hours
22 of field service a month in the preaching work.

23 And then there's a regular pioneer, which
24 is -- which is a permanent -- has a permanent -- I
25 should say, the auxiliary pioneer is a temporary pioneer

1 status which can be applied for a month at a time. And
2 then a regular pioneer is then on a permanent status,
3 and they agree to put 70 hours minimum a month in the
4 field service.

5 Q Okay. All right. If I were to say that a
6 person is a ministerial servant, what would that mean?

7 A Okay. A ministerial servant, which is
8 referred to in some religions as a deacon, it would be a
9 male member of the congregation that -- that takes on
10 some additional responsibilities, aside from simply
11 attending meetings. They might be someone who assists
12 in passing microphones to those who comment in the
13 meetings, or maybe serving as an attendant helping
14 people find their seats. Things -- things of a minor
15 nature. And, of course, they help -- they help the
16 elders in some minor activities.

17 Q Okay. Now, are there specialties among the
18 ministerial servants?

19 A Oh, there are assignments giving -- for
20 example, someone may be assigned to oversee a small
21 department maybe to help in. Although, actually,
22 they're not -- they're not actually assigned to oversee.
23 The elders are overseers.

24 The ministerial servants may be asked to -- to
25 help man the literature department, which would be

1 distributing maybe books to the -- to the publishers who
2 need them.

3 Another ministerial servant may be assigned to
4 man the magazine department, where he would be assigned
5 to give magazines to the ones that go out in the field
6 service.

7 Another ministerial servant may be assigned to
8 coordinate some of the activities with the attendants or
9 the microphone handlers, things of that nature.

10 Q What are the requirements to become a
11 ministerial servant?

12 A The requirements that we use for ministerial
13 servants we take from the scriptures. And in the first
14 letter to Timothy, there's a -- there are requirements
15 that are listed that we have to consider each time we --
16 we look for someone in the congregation that would
17 like -- would like to become a ministerial servant.

18 Q A ministerial servant, does it have to be a
19 person who is a publisher?

20 A Yes.

21 Q Okay. So the same requirements for
22 ministerial servants in terms of -- I mean for
23 publishers, rather, in terms of eligibility -- living in
24 accordance with the scriptures, those kinds of things --
25 would apply to a ministerial servant as well?

1 A Oh, yes, yes.

2 Q What happens if it comes to light that a
3 person's not living -- a ministerial servant is not
4 living in accordance with the principles that would be
5 expected?

6 A He's removed.

7 Q And who removes him?

8 A A committee is formed, and it would be the
9 recommendation of that committee that begins the
10 process.

11 Q That would be a judicial committee?

12 A Yes.

13 Q I've got some questions on that in a little
14 while.

15 A That's called a judicial committee, yeah.

16 Q Who makes the appointment of a person to
17 become a ministerial servant?

18 A That's done by -- well, this -- I should say
19 what -- if there's an application -- I'm sorry. If
20 there's a recommendation by the local congregation, then
21 that's sent to -- to the Watchtower.

22 Q Then the Watchtower has the final say?

23 A They have final say.

24 Q If I were to say that a person was an elder,
25 what would that mean?

1 A Okay. Well, again, there are scripture
2 requirements that are above and beyond what the
3 ministerial servants are required. There are some --
4 not too much, but a few more requirements. But
5 otherwise, it's the same process.

6 Q And what are the responsibilities of an elder?

7 A Okay. An elder -- elders are overseers of the
8 congregation. So the requirements of an elder would
9 involve the coordination of all of the activities of the
10 congregation. And, of course, that would -- that means
11 the overseeing of the meetings, field service, attending
12 to problems that's in the congregation.

13 Q What kind of problems?

14 A If -- if an individual may have a personal
15 problem, difficulties of any sort, they'll call an
16 elder.

17 Q Okay. Are there specific requirements to
18 becoming an elder?

19 A Well, yeah. An elder has to be not only a
20 publisher in good standing, but he has to be exemplary
21 as a Christian. That's -- that's what -- that's what's
22 expected.

23 You know, as I say, when -- when a committee
24 is formed to -- or I should say, the elder body, usually
25 the -- it's the elder body that would -- that would

1 consider a ministerial servant who may be eligible to
2 become an elder. And, you know, they -- they have to
3 follow scriptural procedure and carefully go down the
4 list of all of the requirements that are scriptural.
5 And -- and all of the elders present, all of the elders
6 of the congregation would then comment and -- and bring
7 up points about the individual things that they might
8 have known. Or -- or if there were any concerns, that
9 would be the time to bring them up.

10 Q Are elders always chosen from among the
11 ministerial servants?

12 A Yes.

13 Q During the time when you were at the Linda
14 Vista Spanish congregation, approximately how many
15 elders were there?

16 A It fluctuated during the years that I was
17 there. At any given time, we usually didn't have more
18 than three or four elders. I think when we finally --
19 when we finally reached six elders was when we
20 separated.

21 Q Did you ever hold any other position -- well,
22 scratch that.

23 Did you ever hold any positions within the
24 Linda Vista Spanish congregation?

25 A I did.

1 Q Had he been reinstated at that time?

2 A Yes.

3 Q I'd requested you to bring documents with you
4 today, if you had any.

5 A I don't have any documents.

6 Q Okay. Then I don't have much more.

7 A Okay.

8 Q All right.

9 You said that the La Jolla congregation was
10 formed, you thought, in 1987?

11 A I believe so.

12 Q Was that just the Spanish congregation was
13 formed in 1987?

14 A Yes.

15 Q So there had been an English congregation
16 prior to that?

17 A Yes.

18 (Exhibit 1 identified.)

19 BY MR. STOREY:

20 Q All right. I'm going to show you a document.
21 It's written in Spanish. Can you read Spanish?

22 A I can, yes.

23 Okay.

24 Q Just a couple of quick questions. In the
25 first paragraph, it says that the Linda Vista

1 congregation -- or at least reading between the lines --
2 the Linda Vista congregation was a parent congregation
3 of the La Jolla congregation; is that correct?

4 A Yes.

5 Q What does that mean?

6 A It means the new -- the members of the new
7 congregation would have been taken from the parent
8 congregation. So we -- basically, we split one
9 congregation and formed two.

10 Q Okay. So Linda Vista congregation is just
11 growing, so they decided to create a second
12 congregation?

13 A Exactly. We just outgrew our space.

14 Q Okay. Now, was there another parent
15 congregation, or just Linda Vista?

16 A No. In this case, it was only Linda Vista.

17 Q About halfway down, there's a heading that
18 says "Conductor de la Atalaya."

19 A Uh-huh.

20 Q What does that mean?

21 A Each -- in our case, each Sunday, a portion of
22 our meeting is a consideration of an article in the
23 Watchtower magazine. And "Atalaya" in Spanish is "The
24 Watchtower" in English. So it's -- it's a study
25 conductor.

EXHIBIT 2

1 IRWIN M. ZALKIN, ESQ. (#89957)
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN DIEGO**

10 John Dorman, Individually, and Joel
11 Gamboa, Individually,

12 Plaintiffs,

13 v.

14 Defendant Doe 1, La Jolla Church,
15 Defendant Doe 2, Linda Vista church, and
16 Defendant Doe 3, Supervisory
17 Organization, Defendant Doe 4,
Perpetrator, and Does 5 through 100,
18 inclusive,

19 Defendants.
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21
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) Case No: 37-2010-00092450-CU-PO-
) CTL
)

) **DECLARATION OF WILLIAM H.**
) **BOWEN IN SUPPORT OF**
) **PLAINTIFFS OPPOSITION TO**
) **DEFENDANTS' MOTIONS FOR**
) **SUMMARY JUDGMENT**

) **Date: 12-16-11**
) **Time: 10:30 a.m.**
) **Dept C-73**
) **Judge: Steven R. Denton**
) **Trial: 1-27-12**
)

23 I, William H. Bowen, declare as follows:

- 24 1. I was born into a Jehovah's Witness family, and lived the lifestyle of a child born to
25 Jehovah's Witness parents from age one to 43 (1957-2001). During that time, I
26 served at the home office of the Jehovah's Witness Religion in Brooklyn, New York
27 from 1977-1979 and participated in classes regarding the beliefs and practices of
28

1 Jehovah's Witnesses. I served as a pioneer, which is a full time missionary, from
2 1974-1976 and 1979-1981.

3 2. I was appointed as a ministerial servant from 1979-1985 and served as an elder from
4 1985-1992 and 1994-2001. I have served in most administrative levels of service in
5 the organization including as the Presiding Overseer of two congregations, the
6 Theocratic School Overseer, the Secretary, the Watchtower Overseer, the Book
7 Study Overseer, and many other day-to-day managerial positions within the
8 congregation. I have presided over, or participated in, over one hundred judicial,
9 special and appeal committees. As an Elder, I was also provided with a copy of the
10 book, Pay Attention to Yourselves and to All the Flock. This book was provided to
11 Elders and contained considerations for how Elders were expected to move during
12 Judicial Committee.

13 3. Since 2001, I have served as the National Director of Silentlambs Inc., a child abuse
14 awareness organization that assists Jehovah's Witness victims of abuse. Silentlambs
15 is an internationally known organization that educates the public and media on the
16 practices of the Jehovah's Witness Religion, and how the religion relates to abuse
17 issues. Silentlambs Inc. is the oldest organization of its type in the field of research
18 and support of abuse victims.

19 4. I have taught, and participated in, Elder training schools and Pioneer Schools. I have
20 worked as an overseer or assistant at the convention level in The Administration
21 Office, Food Service, Public Relations, Parking, Rooming, Volunteer Service,
22 Accounting, Security and The Attendant Department.

23 5. I have been assigned teaching parts and public discourses on the Circuit Assembly
24 and District Convention levels.

- 1 6. I am the author of numerous articles on the policies and practices of Jehovah's
2 Witnesses, as well as two published books and manuals. I have also personally
3 assisted in developing 24 documentaries, which have aired in over 50 countries,
4 regarding the doctrine and practice of Jehovah's Witnesses when they deal with
5 abuse issues involving children.
- 6 7. Since 1965 I have accumulated the world's most comprehensive collection of the
7 Jehovah's Witnesses' official publications outside of the Jehovah's Witness world
8 headquarters. My testimony in this declaration is based on my personal experience in
9 the Jehovah's Witness faith, the study of my private collection of Jehovah's Witness
10 publications, including numerous books, magazines and internal documents
11 published and written by Jehovah's Witnesses (the Watchtower Bible and Tract
12 Society of New York, Inc.), and numerous court cases in which Jehovah's Witnesses
13 testified as to their beliefs and practices.
- 14 8. Since leaving the religion in 2002, I have interviewed numerous Jehovah's Witnesses
15 and former Jehovah's Witnesses who have added to my knowledge of beliefs and
16 practices of the Religion. Without exception, Jehovah's Witnesses testifying in court
17 as to their lifestyle have agreed with the beliefs and practices as described by those
18 Witnesses and ex-Witnesses whom I have interviewed.
- 19 9. I have consulted on child custody disputes involving Jehovah's Witness parents, and
20 as an expert on the religion known as Jehovah's Witnesses and attended depositions
21 involving Jehovah's Witness legal issues. I have consulted on cases involving
22 litigation of liability and tax cases involving Jehovah's Witnesses. I have been an
23 expert witness on the beliefs and practices of Jehovah's Witnesses and assisted in
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1 cases in the United States of America: Oregon, New Hampshire, New York, Indiana,
2 and Kentucky.

3 10. In 2008, I testified before the European Commission in Belgium on the beliefs and
4 practices of Jehovah's Witnesses. I also provided expert testimony before the
5 French National Assembly in September 2008 regarding the beliefs and practices of
6 Jehovah's Witnesses as their policies apply to the abuse of women and children.
7

8 ELDERS

9 11. The Body of Elders is responsible for overseeing operation of the congregation. This
10 responsibility includes seeing that the Kingdom Hall is maintained, ordering
11 literature to be used in Field Service, organizing and directing the weekly
12 congregation meetings, keeping records regarding individual member's time spent in
13 service activities, keeping records of Bible Study sessions, summarizing information
14 to be transmitted to Watchtower New York's representatives, communicating with
15 Watchtower New York regarding issues affecting the congregation, collecting
16 donations for the benefit of the congregation, collecting donations to be transmitted
17 to Watchtower New York, monitoring members of the congregation to determine
18 which members may meet the requirements to become Ministerial Servants or
19 Elders, helping members of the congregation when they experience problems either
20 personally or with another Jehovah's Witness, determine whether wrongdoing has
21 occurred and if substantiated impose punishment on the wrongdoer, provide
22 instruction to members of the congregation regarding how to improve their
23 presentation during Field Service, and offering spiritual direction on Christian living
24 ,among other duties. From at least 1979 until 1988, a congregation's Elders also
25 exercised complete control over who could become a Publisher in the Congregation.
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1 12. Throughout the 1980s and 1990s, Elders were referred to in the publication known
2 as The Watchtower as "stars in the right hand of Christ", and "Glorious Ones."
3 Elders were looked upon reverently by the members of the congregation. In fact,
4 members were required to first approach Elders within the congregation with any
5 allegation of wrongdoing, including allegations of childhood sexual abuse. As a
6 result, of that meeting with the Elders, many members were discouraged from
7 reporting abuse to authorities.
8

9 13. Elders are selected from among the congregation's Ministerial Servants. Throughout
10 the 1980s and 1990s the existing Body of Elders had responsibility for observing the
11 individuals serving the congregation as Ministerial Servants and selecting those
12 members that satisfied the criteria for becoming an Elder. Generally, twice per year
13 each congregation was visited by an agent appointed by Watchtower New York
14 known as a Circuit Overseer. When the Circuit Overseer visited a congregation, the
15 Elders discussed the prospective Elders and following the Circuit Overseer's visit a
16 recommendation could be made to Watchtower New York that one or more
17 Ministerial Servants from the congregation be appointed as Elders. Watchtower
18 New York then made the final determination as to whether the recommended
19 individuals would be appointed as Elders.
20
21

22 14. Upon becoming an Elder, a Jehovah's Witness is provided a book titled "Pay
23 Attention to Yourselves and to All the Flock" (Pay Attention). This book is
24 published by Watchtower New York, and distributed to all Jehovah's Witness Elders
25 in the World. Several different editions of Pay Attention have been published. The
26 1979 version of Pay Attention was current when Gonzalo Campos was Baptized in
27 1980. In 1981, a new edition was published and this version of Pay Attention
28

1 remained current until well after Campos was appointed as a Ministerial Servant in
2 December of 1988.

3 15. Pay Attention provides detailed instruction to Elders from Watchtower New York
4 regarding many aspects of local congregation governance, including how long
5 specific meetings should last during the week and how they should be structured,
6 how to nurture congregation members with the potential and drive to become
7 Ministerial Servants and Elders and how to handle accusations of wrongdoing by a
8 member of the congregation, among others. Through Pay Attention, Watchtower
9 New York exerts significant control over the functioning of local congregations and
10 their members.
11

12 16. Watchtower periodically directs letters addressed to "All Bodies of Elders", or "All
13 Bodies of Elders in the United States", or some similar honorific to each
14 congregation in the United States. These letters provide instruction to local
15 congregation Elders regarding the handling of issues that may arise in the
16 congregation. These letters instruct Elders on an extremely broad range of topics
17 ranging from the handling of childhood sexual abuse allegations, to how to maintain
18 documents in the congregation file, to what local elders should tell individuals who
19 want to leave property to the congregation in their wills. Through these letters
20 addressed to the Bodies of Elders, Watchtower utilizes the Body of Elders to control
21 minute details occurring in most conceivable aspects of the congregation.
22
23

24 MINISTERIAL SERVANTS

25 17. Ministerial Servants are selected from among the Baptized males in the
26 congregation. The Body of Elders identifies Baptized males from the congregation
27 who they believe meet the requirements to serve as Ministerial Servants.
28

1 Throughout the 1980s and 1990s and prior to 2001, the Body of Elders, with the
2 assistance of an appointee of the Watchtower Bible and Tract Society of New York,
3 Inc., called a Circuit Overseer, discussed whether prospective Ministerial Servants
4 meet the criteria for appointment, and if so, a recommendation was made to the
5 Watchtower. The Watchtower then approved or rejected that recommendation.
6

7 18. Ministerial Servants are appointed to aid the Elders in the administration of the daily
8 affairs of the congregation. Duties of a Ministerial Servant may include, but are not
9 limited to, helping keep records relating to the coverage of the Congregation's
10 territories, keeping tack of the amount of literature on hand at the Kingdom Hall,
11 helping with the sound system, cleaning the Kingdom Hall, greeting members of the
12 congregation when they arrived at meetings, leading Field Service in the absence of
13 an Elder, giving talks or taking on parts in the weekly meetings, or helping an Elder
14 keep the accounts.
15

16 19. Since Ministerial Servants have been singled out to hold a responsible position in the
17 congregation, they are viewed with admiration and are treated with respect and
18 deference by members of the congregation. Elders utilize Ministerial Servants to
19 accomplish Elder duties when Elders are not present. As a result, Ministerial
20 Servants are viewed as leaders in the congregation in the absence of an Elder. For
21 example, if the Elders are absent at Elder School, Ministerial Servants will perform
22 the Elders' tasks while they are away. If an Elder is sick, a Ministerial Servant may
23 be called on to conduct meetings or take on other Elder assignments.
24
25
26
27
28

PIONEERS

20. Pioneers are members of the congregation who have made a commitment to spend a certain number of hours per month in service activities. Throughout the 1980s and 1990s, there were several different classifications of Pioneers.

21. Regular Pioneers make a commitment to spend a substantial number of hours in service each month. During the 1980s, Regular Pioneers committed to spend 90 hours each month engaging in service activities, and committed to maintain that level of activity for one year. To become a Regular Pioneer, a member of the congregation made application to the Body of Elders. Regular Pioneer applications would be discussed by the Body of Elders with the Circuit Overseer during his visit. If the application was approved by the Body of Elders, the recommendation was sent to Watchtower New York for final approval or rejection.

22. Auxiliary Pioneers make a commitment to spend a specified number of hours in service during a given month. During the 1980s, Auxiliary Pioneers committed to spend 60 hours in a given month engaging in service activities. At that time, to become an Auxiliary Pioneer, a congregation member would make application to the Body of Elders to be an Auxiliary Pioneer the following month. For example, if a member of the congregation had time off from work at the Christmas Holiday, he or she may make application to the Body of Elders to serve as an Auxiliary Pioneer for the month of December since he or she would be able to spend more time in service as a result of the time off of work. This application would be completed the month prior to the month that the member desired to serve as an Auxiliary Pioneer.

23. Throughout the 1980s, Regular Auxiliary Pioneers made a commitment to spend the same specified number of hours in service in a given month as Auxiliary Pioneers,

1 but did so on a continual, month-to-month basis. Such a person may not be able to
2 satisfy the higher hour requirements associated with being a Special or Regular
3 Pioneer, but could continually satisfy the requirements of an Auxiliary Pioneer.

4
5 24. Pioneers are viewed as examples in the congregation. When Elders are considering
6 offering privileges, such as a position as a Ministerial Servant, service as a Pioneer
7 would make a prospective privilege holder stand out. Being a Pioneer gives a
8 member position that stands out in the congregation, which enhances his or her
9 status in the congregations. Pioneering is encouraged to young children in lieu of
10 higher education.

11 PUBLISHERS

12
13 25. Publishers are members of a local congregation. Publishers can be either baptized or
14 unbaptized.

15 26. During the late 1970s, and until 1988, to become an Un-Baptized Publisher, a
16 prospective Publisher studied the Bible with a baptized member of the congregation
17 and attended meetings at the Kingdom Hall. After several months of study, the
18 prospective Publisher would be interviewed by a group of Elders from the
19 congregation where the prospective Publisher attended meetings. This group would
20 often consist of two Elders. The Elders would meet with the prospective Publisher
21 and ask a series of questions that related both to the prospective Publisher's level of
22 knowledge of the Bible and of the beliefs of the Jehovah's Witness faith, and to the
23 character of the prospective Publisher. These Elders made the decision as to whether
24 the prospective publisher would be accepted as a Publisher of the Jehovah's Witness
25 faith.
26
27
28

1 27. Once a person became an Un-Baptized Publisher he or she received the right to
2 participate in Field Service, which involves door to door preaching. An Un-Baptized
3 publisher can join the Theocratic Ministry School, can conduct Bible Study and can
4 volunteer for work assignments at the Kingdom Hall. Also, upon approval as an Un-
5 Baptized Publisher, he may then obtain a copy of Organized to Accomplish Our
6 Ministry
7

8 28. As the term suggests, a person becomes a Baptized Publisher after becoming
9 baptized as one of Jehovah's Witnesses. Baptism is an ordination as a minister of the
10 Jehovah's Witness faith. To be approved, an Un-Baptized Publisher would approach
11 one of the Elders and inform him that he or she wanted to become baptized. One
12 Elder would then be assigned by the Presiding Overseer to consider, with the
13 prospective Baptized Publisher, the first section of baptismal questions for
14 prospective baptism candidates in the Organized to Accomplish Our Ministry Book.
15 A second Elder would be assigned to consider the second section in the baptismal
16 questions for prospective baptism candidates in the Organized to Accomplish Our
17 Ministry Book. A third Elder would then be assigned to consider the third and
18 fourth sections of the baptismal questions for prospective baptism candidates in the
19 Organized to Accomplish Our Ministry Book. These meetings would take place on
20 different days, and would last approximately one hour each. If, after completing
21 each meeting, the Elders believe that the baptismal candidate had sufficient
22 knowledge of the Bible and has conformed his life to the guidelines for being a
23 Jehovah's Witness, then the baptismal would be baptized.
24
25

26 29. A person must be an Un-Baptized Publisher, before he or she can be a Baptized
27 Publisher. Throughout the 1980s, Baptized Publishers were afforded more rights
28

1 and responsibilities in the congregation that Un-Baptized Publishers, for example
2 Baptized Publishers receive a copy of Kingdom Ministry on a monthly basis,
3 Baptized Publishers can be assigned parts on the Service Meeting or Theocratic
4 Ministry School, Baptized Publishers can qualify for responsible positions and
5 Baptized Publishers can be subject to discipline by a Judicial Committee.
6

7 JUDICIAL COMMITTEES

8 30. If an allegation of wrongdoing came to the attention of one of the Elders of a
9 congregation during the mid 1980s, protocol dictated that the Elder bring the
10 accusation to the Presiding Overseer. The Presiding Overseer would then call a
11 member of the Body of Elders and make them aware of the allegation of
12 wrongdoing. Customarily, two Elders would then be assigned to investigate the
13 matter. This investigation would include an interview of the accuser, the accused,
14 and any other witnesses with knowledge of the alleged wrongdoing. It may also
15 involve the review of documentary evidence, if such evidence existed.
16

17 31. After completing the investigation, the two Elders assigned to investigate would
18 make a recommendation to the Body of Elders as to what steps should be taken. If
19 the wrongdoing was corroborated by two or more credible witnesses, by
20 undisputable evidence, or if the accused confessed, a Judicial Committee would be
21 formed. If only one credible witness came forward, and the accused wrongdoer did
22 not confess, no action would be taken by the Body of Elders. Once a determination
23 was made that sufficient evidence of the wrongdoing existed to proceed with a
24 Judicial Committee, a Committee of Elders was formed. Such Committees would
25 most often be comprised of three Elders, but in some instances could include a larger
26 number of Elders.
27
28

1 32. Once a Judicial Committee was formed, the accused would be informed of its
2 existence and asked to meet with the Committee. The Committee would present the
3 charges against the accused. The accused would have been given an opportunity to
4 address the Judicial Committee. The Elders would then demonstrate the evidence,
5 and make a determination.
6

7 33. A Judicial Committee can result in any of several possible outcomes including
8 private reproof, public reproof, and disfellowship. If the members of the Judicial
9 Committee determine that the wrongdoing did occur, but that the accused is truly
10 repentant for actions, the Committee may choose to either publicly or privately
11 reprove the wrongdoer. Private reproof means that the Judicial Committee imposed
12 some form of restriction on the wrongdoer, but that no announcement was made to
13 the congregation. Public reproof, on the other hand, means that the Judicial
14 Committee made an announcement to the congregation that the wrongdoer's
15 privileges had been restricted, but the announcement would not inform the
16 congregation what wrong had been committed.
17

18 34. If the members of a Judicial Committee determine that the wrongdoing occurred, and
19 that the accused was not truly repentant of his actions, the wrongdoer could be
20 disfellowshipped. To be disfellowshipped means that the wrongdoer is no longer
21 considered one of Jehovah's Witnesses. He or she is permitted to attend public
22 meetings at the Kingdom Hall, but may not comment during the discussion. Nor is
23 the disfellowshipped one permitted to attend private gatherings at congregation
24 member's homes, or to participate in Field Service. When the disfellowshipped one
25 attends public meetings, the members of the congregation do not speak to him or her.
26
27
28

1 After time has passed, a disfellowshipped one may ask the Body of Elders to be
2 reinstated.

3 35. During the mid 1980s, if a Judicial Committee decided that a wrongdoer should be
4 disfellowshipped, the Watchtower would be informed of that decision and provided
5 with documentation as to the name of the disfellowshipped one, any responsible
6 positions held by the disfellowshipped one, the reason for the disfellowshipping, and
7 the evidence supporting the decision as determined by the Judicial Committee.
8

9 FIELD SERVICE

10 36. Field Service is an important part of the Jehovah's Witness faith. Field Service
11 involves members of a local congregation preaching door-to-door in the community.
12 Formal Field Service begins with a "meeting for Field Service." This meeting is
13 often led by a congregation Elder, or Ministerial Servant. If no Elders or Ministerial
14 Servants are present, the meeting may be led by a Baptized male Pioneer, a Baptized
15 male Publisher, or if no Baptized males are present, a Baptized female, wearing a
16 head covering.
17

18 37. The meeting for Field Service generally begins with a discussion of a daily scripture,
19 and the accompanying Watchtower comment. Then, a demonstration is given
20 explaining how to present the material that day, and discussing the literature that will
21 be offered. Finally, the members are divided into car groups by the person
22 conducting the meeting for Field Service and instructed which territory to visit.
23

24 38. Each car group is directed by a car captain. The car captain will generally be a
25 Baptized male holding the highest position of those within the car group. Upon
26 arriving in the neighborhood where the group will be preaching, the car captain
27 directs the others in their coverage of the territory.
28

- 1 39. During field service, the congregation members call on homes in their assigned
2 territory. They knock on the door and initiate contact with the residents. They
3 distribute literature, attempt to engage the residents in discussion about the
4 Jehovah's Witness faith and invite interested residents to attend meetings at the
5 Kingdom Hall. The congregation members will endeavor to start a home Bible Study
6 with the residents they contact. The Literature distributed by congregation members
7 during Field Service is published by Watchtower New York.
8
- 9 40. The congregants' efforts to invite residents to attend meetings at the Kingdom Hall,
10 or to begin Home Bible Studies are the primary means by which the Jehovah's
11 Witnesses, including local congregations and Watchtower New York, attract new
12 members to their faith.
13
- 14 41. Congregants fill out a house to house record. This card requires the congregant to
15 make a notation regarding every door they knocked on. The congregant may
16 indicate on the card that no one was home, that contact was made, that there was
17 interest within the household, or that literature was left behind, or that there was no
18 interest in the household. The house to house form would be turned into the territory
19 card holder. Territory cards and territory records are reviewed by the Service
20 Overseer to make sure they are being worked in accordance with the guidelines of
21 the organization.
22
- 23 42. Uniformity and consistency in the distribution of the literature is ensured by holding
24 weekly training sessions that instruct congregants on methods of literature
25 distribution. The Theocratic Ministry School and the Service Meeting provide
26 weekly instruction to congregants regarding methods for approaching individuals
27 and of literature distribution and training to improve the congregants' presentation.
28

1 43. The congregants' progress is evaluated and recorded. There is a speech counsel slip
2 related to performance in the Theocratic Ministry School that is kept by the
3 Theocratic Ministry School Overseer. Bible Study forms and Publisher cards are
4 also maintained to track and evaluate a congregants' service activities.
5

6 44. Congregation Elders are required to attend and / or oversee Field Service Meetings
7 where the congregants coordinate the distribution of materials. The congregant must
8 be trained and must work as an understudy in formal Field Service. Elders often
9 accompany congregants in Field Service to evaluate their performance.

10 45. Beyond controlling the distribution of literature, Watchtower also controls the
11 congregant's appearance. The congregant must observe Watchtower's dress code
12 and personal grooming guidelines when engaged in formal Field Service. The
13 congregant is required to conform to those standards at all times, including when
14 attending meetings at the Kingdom Hall, when giving Bible Study, when shopping
15 at the grocery store, or making any other appearance in public. If a congregant does
16 not comply with these requirements, they are not allowed to participate in Formal
17 Field Service.
18

19 46. During Field Service the congregant must request donations for the organization.
20

21 I declare under penalty of perjury to the best of my knowledge that the foregoing is
22 true and correct. Executed this 30, day of November, 2011, at
23 Nashville, Tennessee.

24 
25 William H. Bowen
26
27
28

EXHIBIT 3



ORIGINAL

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO**

**John Dorman, Individually,
and Joel Gamboa,
Individually,**

Plaintiffs,

vs.

**CASE NO. 37-2010-00092450-
CU-PO-CTL**

**Defendant Doe 1, La Jolla
Church; Defendant Doe 2,
Linda Vista Church;
Defendant Doe 3, Supervisory
Organization; Defendant
Doe 4, Perpetrator; and
Does 5 through 100,**

Defendants.

~~~~~

**DEPOSITION OF  
RAMON PRECIADO**

**February 9, 2011**

**11:33 a.m.**

**12555 High Bluff Drive  
Suite 260  
San Diego, California**

**www.DEPO911.com**

**toll free (877) DEPO 9-1-1**

1 Q. Were you ever introduced to someone by the  
2 elders or by the Kingdom Hall?

3 A. I don't understand the question.

4 Q. Okay. Yeah, it was a bad one.

5 Were you ever assigned to give Bible study to a  
6 particular person by the congregation?

7 A. Not that I remember.

8 Q. Were you required as a member of the  
9 congregation to give Bible study if someone asked?

10 A. Could you state that again?

11 Q. If someone asked you for Bible study --

12 A. Uh-huh.

13 Q. -- were you required to give it, or could you  
14 say "no"?

15 A. I can say "no."

16 Q. Okay. If I were to say that a person was a  
17 publisher, what would that mean?

18 A. It's a person that goes and preaches door to  
19 door.

20 Q. Is every member of the congregation a  
21 publisher?

22 A. No.

23 Q. So what specific requirements must be met for a  
24 person to be a publisher?

25 A. Well, they've got to be in good standing and

1 they are willing to go, you know. They request  
2 themselves to go door to door, knock at the door and  
3 talk about the Bible.

4 Q. Are they appointed as a publisher?

5 A. Yes.

6 Q. Who makes the appointment?

7 A. Two elders.

8 Q. So will the person request to be a publisher?

9 A. Yes, they do.

10 Q. And the two elders will consider the request?

11 A. Yes, and their qualifications. You know,  
12 they've got to be in good standing position. They've  
13 got to be a clean person -- morally clean and -- you  
14 know, they ask a few questions. How's your wife? Blah,  
15 blah. All that.

16 Q. If a person has already become a publisher and  
17 then later it comes to light that they are not living  
18 morally clean, can they be stripped of that position?

19 A. Oh, yes. Yes.

20 Q. So if a -- if it came to light that a person  
21 had acted inappropriately with a child, would you expect  
22 that person to lose their position as a publisher?

23 A. Oh, yes.

24 MR. MC CABE: I'm going to throw in a late  
25 objection. "Inappropriate" could mean a lot of

1 different things. And -- there it is.

2 BY MR. STOREY:

3 Q. If a person had been accused of sexually  
4 abusing a minor, would you expect that person to lose  
5 their position as a publisher?

6 A. Yes.

7 Q. Other than going door to door, are there any  
8 specific requirements or responsibilities of a  
9 publisher?

10 A. Keep a good standing, a moral standing.

11 Q. Okay. If a person who is a publisher falls out  
12 of good moral standing, who is it that would make the  
13 decision to strip them of their position?

14 A. The elders.

15 Q. Would it be the body of elders as a whole?

16 A. Yes. We are all informed -- the body of elders  
17 are informed of such a matter and then they take a  
18 decision and -- a couple of them talk to the person.

19 Q. Okay. If I were to say a person was a pioneer,  
20 what would that mean?

21 A. It's a person that promise to increase their  
22 preaching door to door a certain number of hours.

23 Q. And are their different types of pioneers?

24 A. Yeah, two types. Regular and auxiliary.

25 Q. What's the difference?

1       Q. To the best of your knowledge, was Gonzalo  
2 Campos a publisher?

3       A. Yes.

4       Q. Do you know if Gonzalo Campos was ever --

5       A. Let me go back. What dates are you talking  
6 about? When he became a publisher when?

7       Q. Do you know if he was a publisher when you met  
8 him in 1979 or 1980?

9       A. I don't think so, no.

10      Q. Do you know if he became a publisher before you  
11 left the Linda Vista Spanish congregation?

12      A. Yes. Yeah, before he came, yes.

13      Q. Do you know if he was a publisher in 1981?

14      A. No.

15      Q. Do you know specifically when he became a  
16 publisher?

17      A. More or less, like, in '83 -- '82 or '83,  
18 somewhere in there -- or maybe '84.

19      Q. Do you know if Gonzalo Campos was ever an  
20 auxiliary pioneer?

21      A. When, again? Because it takes time.

22      Q. During your period of time at the Linda Vista  
23 Spanish congregation --

24      A. No.

25      Q. Do you know if he ever was?



1 A. No, not at Linda Vista.

2 Q. If I were to say that a person is a ministerial  
3 servant, what would that mean?

4 A. It's someone that has -- aids the elder. He  
5 has more privileges and they help the elders.

6 Q. What privileges do they have?

7 A. They help the elders in accounting and the  
8 territories and -- taking the groups out to service.  
9 And sometimes he talks -- public talks from the podium.

10 Q. Are those things that regular publishers can't  
11 do?

12 A. Right.

13 Q. In addition to those privileges, are there any  
14 responsibilities that are accepted by ministerial  
15 servants?

16 A. In which way?

17 Q. Is there anything that they're required to do  
18 by virtue of holding that position?

19 A. Well, yeah, they have to be -- again, moral  
20 standard to be good and be an example in the  
21 congregation. I look at them, like someone that is  
22 spiritually in a good standing position and moral clean.

23 Q. How is a person chosen to be a ministerial  
24 servant?

25 A. The elders are watching every young man that

1 Q. Just long enough for the elders to get a sense  
2 of the person's qualifications and moral character?

3 A. Right.

4 Q. And do the elders have the final say on who  
5 becomes a ministerial servant?

6 A. Well, I'll say God has the final say, but yeah,  
7 the elders communicate to the person.

8 Q. Okay. Do the elders have to get the approval  
9 of the Watchtower before a person can become a  
10 ministerial servant?

11 A. Yes.

12 Q. Okay. So if the elders believe someone is  
13 qualified and a good candidate to be a ministerial  
14 servant, will they make a recommendation to the  
15 Watchtower?

16 A. Yes.

17 Q. And then the Watchtower has the final say?

18 A. Yeah, they're approved, but it's still -- the  
19 elders can decide. They can decide to go ahead and --

20 (Cell phone interruption)

21 THE REPORTER: "They can go ahead and..." what?  
22 I'm sorry.

23 THE WITNESS: And give the notice to the person  
24 or ask the person if they want to accept it or not. Or  
25 if we see something bad -- the elders -- they will not

1 elders ask him if he wants to serve as an elder -- have  
2 the privilege of service. And then he accepts it or  
3 not.

4 Q. Okay. Does the body of elders have to get the  
5 permission of the Watchtower to appoint a ministerial  
6 servant as an elder?

7 A. Have permission -- in which way?

8 Q. Does the body of elders make a recommendation  
9 to the Watchtower that they think someone is ready to  
10 become an elder?

11 A. Yes.

12 Q. And does the Watchtower have to approve that  
13 recommendation before the person can be assigned as an  
14 elder?

15 A. Yeah, if the Watchtower approves the  
16 recommendation or rejects the recommendation.

17 (Mr. Moreno exits the deposition room)

18 BY MR. STOREY:

19 Q. Is there any kind of public ceremony or  
20 announcement when someone becomes an elder?

21 A. Yes, in a meeting, after he accepts -- the  
22 person accepts the privilege -- then they make an  
23 announcement: "Such-and-such person is an elder now."

24 (Mr. Moreno enters the deposition room)

25 BY MR. STOREY:

1 A. Yes, they have to. If it's not clear, the --  
2 if it's not -- there is no confession or something, they  
3 have to speak -- like a regular court trial. You know,  
4 they have to find out for sure what's happening.

5 Q. If there is a confession, will a judicial  
6 committee be formed?

7 A. Yes.

8 Q. Okay. And who would constitute that judicial  
9 committee?

10 A. Any -- three elders of the congregation.

11 Q. Would the original two elders who looked into  
12 the matter be on the judicial committee?

13 A. Yes.

14 Q. And a third elder would be appointed?

15 A. Right.

16 Q. If there is no confession, would a judicial  
17 committee still be formed?

18 A. If there's enough evidence and there is  
19 people -- the two other do the investigation and they  
20 find that that's true, everything, then they'll do the  
21 judicial committee.

22 Q. If there is only one accuser and no confession,  
23 would those two investigators have the authority to  
24 create a judicial committee if they believed the  
25 accuser?

1 Q. Depends on why they were disfellowshipped?  
2 A. Right.

3 Q. So if a judicial committee is formed and the  
4 committee believes that the person has committed the  
5 sin, what are the possible outcomes?

6 A. Repeat the question.

7 Q. Okay. If a judicial committee determines that  
8 someone committed the sin, they have the authority to  
9 disfellowship that person, correct?

10 A. Right.

11 Q. What other things can happen if a judicial  
12 committee is formed and believes that the person  
13 committed the sin?

14 A. They inform the person that it's going to be --  
15 disfellowshipped and an announcement is going to be made  
16 seven days, and then the announcement is made.

17 Q. And is there an opportunity to appeal the  
18 decision?

19 A. Yes, within those seven days.

20 Q. Okay. And what does the person have to do if  
21 they want to appeal?

22 A. Write a letter to the Watchtower and give a  
23 copy to the judicial committee.

24 Q. Okay. Who hears the appeal?

25 A. Another -- not the same judicial committee.

1 Q. Okay. A different group of elders?

2 A. Yes.

3 Q. From the same congregation?

4 A. Sometimes. And sometimes from another  
5 congregation.

6 Q. Okay. When the judicial committee completes  
7 its work -- completes its investigation -- does it make  
8 written findings?

9 A. You mean they record everything while it's  
10 going to -- the meeting? The judicial committee?

11 Q. Let me rephrase the question.

12 A. Yes.

13 Q. While the judicial committee is meeting, are  
14 there minutes taken?

15 A. Yes.

16 Q. Are those minutes kept?

17 A. Yes.

18 Q. And where are those minutes kept?

19 A. Together with the envelope when the person is  
20 disfellowshipped. Everything gets inside the envelope  
21 or the file altogether.

22 Q. So what would be expected to be in that  
23 envelope?

24 A. The dates, what happened, how that happened,  
25 and if -- you know, scriptures or whatever was said

1 inside the room is kept inside.

2 Q. So this envelope would have the notes taken by  
3 the members of the judicial committee?

4 A. Yes.

5 Q. Would it have any written evidence that was  
6 found by the judicial committee?

7 A. Yes.

8 Q. So a written complaint would show up in that  
9 envelope?

10 A. Oh, yes, everything.

11 Q. If there was a written confession, would it be  
12 in that envelope?

13 A. Yes.

14 Q. Now, does the judicial committee make a written  
15 report of its findings?

16 A. Only a short one to send it to the Watchtower.

17 Q. So would you expect that report to be in that  
18 envelope?

19 A. Yes.

20 Q. Okay. Now, what happens to that envelope?  
21 Where is it kept?

22 A. Inside the file.

23 Q. And how long -- sorry. Go ahead.

24 A. Inside the -- in a special place of the file.

25 Q. And how long is it kept?

1 A. For as long as the congregation is there.

2 Q. Okay. So there's no set period of time that  
3 you keep it. You just always hold it?

4 A. Right.

5 Q. What happens if the judicial committee  
6 determines that the sinner is repentant?

7 A. Well, he's not get disfellowshipped, but still  
8 he gets observed and all the privileges get taken off.

9 Q. Okay. And how long does that person lose those  
10 privileges for?

11 A. Again, depends on the sin, on the matter that  
12 they did.

13 Q. Is there a minimum amount of time?

14 A. Depends also on the sins.

15 Q. All right. If a person -- what is it called  
16 when the judicial committee determines that a person is  
17 repentant and is no longer committing the sin?

18 A. It's called reestablishment or -- that's a  
19 question?

20 Q. Does the word "reprove" mean anything to you?

21 A. Yes.

22 Q. What does it mean?

23 A. Well, that means it wasn't disfellowshipped,  
24 but it was reprovved, you know, by the judicial  
25 committee.



1 Q. And if a person is reprov'd, does that mean  
2 that the judicial committee has found that person to be  
3 repentant?

4 A. Yes.

5 Q. If a person is reprov'd, is there still a  
6 written report of the findings of the judicial  
7 committee?

8 A. Oh, yes.

9 Q. So the envelope we talked about earlier, the  
10 judicial committee envelope --

11 A. Uh-huh.

12 Q. -- you would expect it to look the same if the  
13 person was disfellowshipped or if the person was  
14 reprov'd?

15 A. It's not the same, but the file is kept there.

16 Q. So what would be -- if a person was reprov'd,  
17 what would be in that envelope?

18 A. The sin they committed and why the judicial  
19 committee would find out that this person was repentant.

20 Q. You would still expect the notes of the members  
21 of the judicial committee to be in that envelope?

22 A. Yes.

23 Q. Would you still expect any written evidence  
24 that was uncovered by the judicial committee to be in  
25 that envelope?

1 A. Yes.

2 Q. And you would expect their written statement at  
3 the end of the judicial committee to be in that  
4 envelope?

5 A. Yes.

6 Q. Okay. And how long would that envelope be kept  
7 if the person was reprovved rather than disfellowshipped?

8 A. For a good time, a really good time.

9 Q. Not as long as if the person was  
10 disfellowshipped?

11 A. Well, I think they're still there. Yeah, it  
12 stays there together with the timecards -- I mean the  
13 publisher cards.

14 Q. So when you were the secretary of the Linda  
15 Vista Spanish congregation --

16 A. Uh-huh.

17 Q. -- was there ever a time you discarded one of  
18 those envelopes?

19 A. No.

20 Q. When you were at the Linda Vista Spanish  
21 congregation, did you ever hear a complaint that a  
22 member of the congregation had sexually abused a child?

23 A. No.

24 Q. Did you ever hear -- when you were at the Linda  
25 vista congregation, did you ever hear a complaint that a

## **EXHIBIT 4**

1 IRWIN M. ZALKIN, ESQ. (#89957)  
2 DEVIN M. STOREY, ESQ. (#234271)  
3 MICHAEL J. KINSLOW, ESQ. (#238310)  
4 The Zalkin Law Firm, P.C.  
5 12555 High Bluff Drive, Suite 260  
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9 Email: Irwin@zalkin.com  
10 dms@zalkin.com  
11 mjpk@zalkin.com,  
12 Attorney for Plaintiffs

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

John Dorman, Individually, and Joel  
Gamboa, Individually,

Plaintiff,

v.

Defendant Doe 1, La Jolla Church,  
Defendant Doe 2, Linda Vista Church, and  
Defendant Doe 3, Supervisory  
Organization, Defendant Doe 4,  
Perpetrator, and Does 5 through 100,  
inclusive,

Defendants.

Case No: 37-2010-00092450-CU-PO-  
CTL

STIPULATION RE FOUNDATION  
OF DOCUMENTS;  
IDENTIFICATION OF  
DEFENDANTS; AND AGENCY OF  
INDIVIDUALS IN SPECIFIED  
POSITIONS

Dept: C-73  
Judge: Steven R. Denton  
Trial: 1-27-12

All named Plaintiffs (hereinafter Plaintiffs) and Defendant Playa Pacifica Spanish  
Congregation of Jehovah's Witnesses (formerly named La Jolla Spanish Congregation of  
Jehovah's Witnesses), San Diego, California, Defendant Linda Vista Spanish Congregation of  
Jehovah's Witnesses, San Diego, California, and Defendant Watchtower Bible and Tract  
Society of New York, Inc. (hereinafter "the Church Defendants"), by and through their  
respective counsel of record, hereby stipulate to the foundation and business record status of

1  
STIPULATION RE FOUNDATION OF DOCUMENTS; IDENTIFICATION OF  
DEFENDANTS; AND AGENCY OF INDIVIDUALS IN SPECIFIED POSITIONS

1 documents produced by the parties in discovery; the proper identification of Defendant Playa  
2 Pacifica Congregation of Jehovah's Witnesses in this action; and the agency status of  
3 individuals holding the positions of Elder or Ministerial Servant.

4 The Plaintiffs and the Church Defendants further agree and stipulate that the stipulations  
5 agreed to herein shall be maintained in confidence and shall be used for the sole and exclusive  
6 purposes of preparing this action, and the action entitled John Rivera, et al. v. Defendant Doe 1,  
7 Pacific Beach Church, et al. (San Diego Superior Court Case Number 37-2011-00096950-CU-  
8 PO-CTL) for motions, hearings, trial or appeal in those enumerated actions, and shall not be  
9 disclosed to any person or entity for any purpose unrelated to the prosecution of the present  
10 litigation. THE AGREEMENTS REACHED HEREIN ARE NOT INTENDED TO BE USED,  
11 AND ARE SPECIFICALLY INTENDED TO BE OF NO EFFECT, IN ANY ACTION  
12 OTHER THAN THOSE SPECIFICALLY ENUMERATED HEREIN.  
13  
14

#### 15 STIPULATED AGREEMENT

16 WHEREAS, Plaintiffs John Dorman and Joel Gamboa have commenced an action  
17 alleging sexual abuse at the hands of Gonzalo Campos while Campos was one of Jehovah's  
18 Witnesses, wherein Plaintiff John Dorman has pursued his claim against Defendant Linda Vista  
19 Spanish Congregation of Jehovah's Witnesses of Jehovah's Witnesses, Defendant Watchtower  
20 Bible and Tract Society of New York, Inc., and Defendant Gonzalo Campos, and Plaintiff Joel  
21 Gamboa has pursued his claim against Defendant Linda Vista Spanish Congregation of  
22 Jehovah's Witnesses, Defendant Playa Pacifica Spanish Congregation of Jehovah's Witnesses,  
23 Defendant Watchtower Bible and Tract Society of New York, Inc., and Defendant Gonzalo  
24 Campos. Defendant Gonzalo Campos is not a signatory to this Stipulation;  
25

26 WHEREAS, all parties to this stipulation have engaged in the discovery process, and  
27 have produced documents in response to requests for production of documents, and the parties  
28

1 to this stipulation seek to streamline the process of establishing the foundation of such  
2 documents, including their authenticity and business record status;

3 WHEREAS, Gonzalo Campos was associated with Defendant Linda Vista Spanish  
4 Congregation of Jehovah's Witnesses until that congregation grew larger, and a new  
5 congregation called La Jolla Spanish Congregation of Jehovah's Witnesses, San Diego,  
6 California, was formed as an off shoot of the Linda Vista Spanish Congregation of Jehovah's  
7 Witnesses, at which time Campos became associated with the newly formed congregation;  
8

9 WHEREAS, in about February 1994, the La Jolla Spanish Congregation of Jehovah's  
10 Witnesses changed its name to Playa Pacifica Spanish Congregation of Jehovah's Witnesses;

11 WHEREAS, events relevant to Plaintiffs' claims occurred both prior to, and after, the La  
12 Jolla Spanish Congregation of Jehovah's Witnesses changed its name to Playa Pacifica Spanish  
13 Congregation of Jehovah's Witnesses, and the parties desire to remove any ambiguity or  
14 confusion as to what entity is involved as a Defendant with respect to Plaintiff Joel Gamboa's  
15 claim;  
16

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

18 All Documents hereto produced in the above-captioned action by any party to this  
19 stipulation, as well as any document subsequently produced by any party to this stipulation, are  
20 genuine and authentic, and satisfy the requirements for authentication as that term is used in  
21 Evidence Code § 1400.  
22

23 All Documents hereto produced in the above-captioned action by any party to this  
24 stipulation, as well as any document subsequently produced by any party to this stipulation,  
25 meets the requirements of a business record as that term is defined in Evidence Code § 1271.

26 No party will challenge the foundation, genuineness, or business record status of any  
27 document produced at any time in this litigation by any party to this stipulation. Nothing in this  
28

1 stipulated agreement shall be construed to limit, in any way, any party's right to object to the  
2 admissibility of any document produced in this action, or any content included in any such  
3 document, on any other ground (relevance, hearsay on hearsay, etc.).

4 Each individual holding the position of Ministerial Servant or Elder in any local  
5 congregation of Jehovah's Witnesses, including Linda Vista Spanish Congregation of Jehovah's  
6 Witnesses, and Playa Pacifica Spanish Congregation of Jehovah's Witnesses, is an agent, as that  
7 term is defined in Civil Code § 2295 of the local congregation in which they hold that title, as  
8 well as an agent of The Watchtower Bible and Tract Society of New York, Inc., for the time  
9 period prior to April 2001.  
10

11 No Defendant will dispute that an individual holding the position of Elder or Ministerial  
12 Servant is an agent of the local congregation to which he is appointed during the period of time  
13 that he holds such positions, or that an individual holding such a position is an agent of The  
14 Watchtower Bible and Tract Society of New York, Inc. during the period of time prior to April  
15 2001 that he holds such position, and Plaintiffs will not conduct discovery for the purpose of  
16 establishing that each local congregation of Jehovah's Witnesses is an agent or alter ego of The  
17 Watchtower Bible and Tract Society of New York, Inc. Nothing in this agreement shall be  
18 construed to preclude any party from conducting discovery regarding other issues.  
19

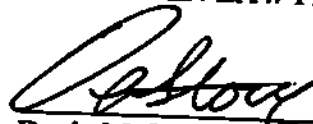
20 Playa Pacifica Spanish Congregation of Jehovah's Witnesses, San Diego, California, is a  
21 continuation of the entity formerly known as La Jolla Spanish Congregation of Jehovah's  
22 Witnesses, San Diego, California. La Jolla Spanish Congregation of Jehovah's Witnesses  
23 merely changed its name to Playa Pacifica Spanish Congregation of Jehovah's Witnesses and /  
24 or Playa Pacifica Spanish Congregation of Jehovah's Witnesses is the successor to La Jolla  
25 Spanish Congregation of Jehovah's Witnesses and is therefore legally responsible for any and  
26 all findings of liability to Plaintiff Joel Gamboa and against La Jolla Spanish Congregation of  
27  
28

1 Jehovah's Witnesses arising from actions of the entity occurring before or after the name  
2 change.

3 Plaintiff Joel Gamboa, in his forthcoming motion to amend his complaint to allege  
4 claims for punitive damages against Defendants, will seek leave to identify Defendant La Jolla  
5 Church as Defendant Playa Pacifica Spanish Congregation of Jehovah's Witnesses, San Diego,  
6 California.

8 THE ZALKIN LAW FIRM, P.C.

9 Dated: 10/19/11

  
Devin M. Storey, Esq.  
Attorney for Plaintiffs

12 Dated: 10/19/11

11 THE MCCABE LAW FIRM, APC

  
James M. McCabe, Esq.

Attorney for Playa Pacifica Spanish Congregation  
of Jehovah's Witnesses

18 Dated: 10/19/2011

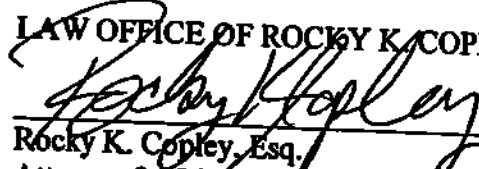
17 WATCHTOWER BIBLE & TRACT  
16 SOCIETY OF NEW YORK, INC., LEGAL  
15 DEPARTMENT

  
Mario F. Moreno, Esq.

Attorney for the Watchtower Bible and Tract  
Society of New York, Inc.

22 Dated: 10/19/11

21 LAW OFFICE OF ROCKY K. COPLEY

  
Rocky K. Copley, Esq.

Attorney for Linda Vista Spanish Congregation  
of Jehovah's Witnesses



## **EXHIBIT 5**

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
2 FOR THE COUNTY OF SAN DIEGO  
3  
4  
5

**CERTIFIED COPY**

6 John Dorman, Individually, and )  
7 Joel Gamboa, Individually, )  
8 Plaintiffs, )

CASE NUMBER: 37-2010-000  
92450-CU-PO-CTL

9 v. )

10 Defendant Doe 1, La Jolla )  
11 Church; Defendant Doe 2, Linda )  
12 Vista Church; Defendant Doe 3, )  
13 Supervisory Organization; )  
14 Defendant Doe 4, Perpetrator, )  
15 and Does 5 through 100, )  
16 Inclusive, )

17 Defendants: )  
18 )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )

DEPOSITION OF

GONZALO CAMPOS

ZONA RIO, TIJUANA B.C., MEXICO

SEPTEMBER 2, 2011

ATKINSON-BAKER, INC.  
COURT REPORTERS  
(800) 288-3376  
www.depo.com

REPORTED BY: GLORIA D. MAZON, CSR NO. 9356

FILE NO.: A507DA0

|    |   |                                             |          |
|----|---|---------------------------------------------|----------|
| 1  | Q | Is that here in Tijuana?                    | 11:32:06 |
| 2  | A | No. It's in San Diego.                      | 11:32:09 |
| 3  | Q | Do you live there now?                      | 11:32:10 |
| 4  | A | No, not anymore.                            | 11:32:13 |
| 5  | Q | Where do you live now?                      | 11:32:15 |
| 6  | A | I am temporarily in Tijuana.                | 11:32:21 |
| 7  | Q | Where are you going to live permanently?    | 11:32:25 |
| 8  | A | In Mexico.                                  | 11:32:28 |
| 9  | Q | Where in Mexico?                            | 11:32:30 |
| 10 | A | In Hidalgo.                                 | 11:32:33 |
| 11 | Q | Is that a state in Mexico?                  | 11:32:35 |
| 12 | A | Yes.                                        | 11:32:38 |
| 13 | Q | What City?                                  | 11:32:39 |
| 14 | A | Pachuca, Hidalgo.                           | 11:32:44 |
| 15 | Q | Do you have an address in Pachuca, Hidalgo? | 11:32:46 |
| 16 | A | No.                                         | 11:32:51 |
| 17 | Q | When are you planning on moving there?      | 11:32:52 |
| 18 | A | In the next weeks.                          | 11:32:58 |
| 19 | Q | Mr. Campos, what's your place of birth?     | 11:33:02 |
| 20 | A | In Mexico city.                             | 11:33:13 |
| 21 | Q | What year?                                  | 11:33:15 |
| 22 | A | In 1963.                                    | 11:33:15 |
| 23 | Q | What was the date of your birth?            | 11:33:19 |
| 24 | A | January 10, 1963.                           | 11:33:26 |
| 25 | Q | How much education have you completed?      | 11:33:29 |

|    |   |                                                 |          |
|----|---|-------------------------------------------------|----------|
| 1  | A | I didn't quite finish the junior high.          | 11:33:43 |
| 2  | Q | So how many years all together formal           | 11:33:48 |
| 3  |   | education, have you had?                        | 11:33:52 |
| 4  | A | You might say eight or nine years; nine         | 11:34:01 |
| 5  |   | years.                                          | 11:34:05 |
| 6  | Q | And was that all here in the Country of         | 11:34:05 |
| 7  |   | Mexico?                                         | 11:34:08 |
| 8  | A | Yes.                                            | 11:34:10 |
| 9  | Q | Now, what year did you enter the United States  | 11:34:11 |
| 10 |   | for the first time to reside?                   | 11:34:13 |
| 11 | A | I don't remember exactly; 1979 or '80.          | 11:34:28 |
| 12 | Q | And you would have been about 16, 17 years old  | 11:34:31 |
| 13 |   | at the time?                                    | 11:34:34 |
| 14 | A | Yes.                                            | 11:34:39 |
| 15 | Q | When did you first start associating with any   | 11:34:47 |
| 16 |   | congregation of Jehovah's Witnesses?            | 11:34:50 |
| 17 | A | When I moved here to the United States.         | 11:35:06 |
| 18 | Q | So when you were about 16, 17 years of age?     | 11:35:10 |
| 19 | A | Yes.                                            | 11:35:13 |
| 20 | Q | How did you first come in contact with          | 11:35:15 |
| 21 |   | Jehovah's Witnesses?                            | 11:35:17 |
| 22 | A | My mother started studying and then, she called | 11:35:33 |
| 23 |   | me and I started studying.                      | 11:35:36 |
| 24 | Q | And again, that was about the time you were 16  | 11:35:39 |
| 25 |   | or 17?                                          | 11:35:42 |

|    |                |                                                |          |
|----|----------------|------------------------------------------------|----------|
| 1  | A              | Yes.                                           | 11:35:47 |
| 2  | Q              | And were you living with your mother in a home | 11:35:47 |
| 3  |                | at that time?                                  | 11:35:50 |
| 4  | A              | No.                                            | 11:35:53 |
| 5  | Q              | Where were you living?                         | 11:35:54 |
| 6  | A              | With a sister from the congregation.           | 11:36:00 |
| 7  | Q              | And when did you first start living with this  | 11:36:04 |
| 8  |                | person?                                        | 11:36:07 |
| 9  | A              | When I came to the United States.              | 11:36:21 |
| 10 | Q              | Who was this person that you were living       | 11:36:21 |
| 11 |                | with?                                          | 11:36:23 |
| 12 | A              | It was Sister Celia.                           | 11:36:26 |
| 13 |                | MR. MORENO: I'm sorry, I didn't hear the       | 11:36:30 |
| 14 |                | name.                                          | 11:36:31 |
| 15 |                | THE WITNESS: Sister Celia.                     | 11:36:33 |
| 16 |                | MR. MORENO: Celia?                             | 11:36:35 |
| 17 |                | THE INTERPRETER: Uh-huh.                       | 11:36:37 |
| 18 | BY MR. MCCABE: |                                                | 11:36:39 |
| 19 | Q              | Where did Celia live?                          | 11:36:39 |
| 20 | A              | In Pacific Beach.                              | 11:36:41 |
| 21 | Q              | Where did you and your mother live?            | 11:36:43 |
| 22 | A              | In La Jolla.                                   | 11:36:46 |
| 23 | Q              | How long did you live with Celia?              | 11:36:50 |
| 24 | A              | I don't remember; might have been four or five | 11:37:04 |
| 25 |                | years.                                         | 11:37:08 |

|    |   |                                                 |          |
|----|---|-------------------------------------------------|----------|
| 1  | Q | Okay. What congregation of Jehovah's Witnesses  | 11:37:09 |
| 2  |   | did you start associating with?                 | 11:37:13 |
| 3  | A | In Linda Vista.                                 | 11:37:22 |
| 4  | Q | And did you have a bible study conducted with   | 11:37:24 |
| 5  |   | you, by someone in the congregation?            | 11:37:29 |
| 6  | A | Yes.                                            | 11:37:35 |
| 7  | Q | Who was the person who studied with you?        | 11:37:36 |
| 8  | A | Sister Celia started.                           | 11:37:45 |
| 9  |   | And after that, another brother.                | 11:37:55 |
| 10 | Q | And what was his name?                          | 11:37:56 |
| 11 | A | Ramon.                                          | 11:37:59 |
| 12 | Q | Ramon?                                          | 11:38:02 |
| 13 |   | Do you know his last name?                      | 11:38:03 |
| 14 | A | Yes; Preciado.                                  | 11:38:09 |
| 15 | Q | Did you study with anyone else, other than with | 11:38:10 |
| 16 |   | Ramon Preciado?                                 | 11:38:12 |
| 17 | A | No.                                             | 11:38:18 |
| 18 | Q | When did you start attending meetings of the    | 11:38:20 |
| 19 |   | Linda Vista Congregation?                       | 11:38:22 |
| 20 | A | After I moved to the United States.             | 11:38:31 |
| 21 | Q | Had you been associated with Jehovah's          | 11:38:36 |
| 22 |   | Witnesses of Mexico, before you moved to the    | 11:38:38 |
| 23 |   | United States?                                  | 11:38:48 |
| 24 | A | No.                                             | 11:38:48 |
| 25 | Q | Did you become baptized as a Jehovah's Witness? | 11:39:00 |

|    |   |                                                         |          |
|----|---|---------------------------------------------------------|----------|
| 1  | A | Yes.                                                    | 11:39:07 |
| 2  | Q | In what year?                                           | 11:39:08 |
| 3  | A | In 1980.                                                | 11:39:11 |
| 4  | Q | And you were about 17 years old then?                   | 11:39:15 |
| 5  | A | Yes.                                                    | 11:39:18 |
| 6  | Q | And you were still associated with the Linda            | 11:39:19 |
| 7  |   | Vista Congregation at that time?                        | 11:39:22 |
| 8  | A | Yes.                                                    | 11:39:32 |
| 9  | Q | And prior to becoming a baptized member of the          | 11:39:33 |
| 10 |   | congregation, did you attend the preaching work that's  | 11:39:38 |
| 11 |   | done by Jehovah's Witnesses?                            | 11:39:40 |
| 12 | A | Yes.                                                    | 11:39:59 |
| 13 | Q | And what age were you, when you started                 | 11:40:00 |
| 14 |   | participating in preaching?                             | 11:40:03 |
| 15 | A | After having been baptized too.                         | 11:40:16 |
| 16 | Q | So you weren't a publisher in the congregation,         | 11:40:19 |
| 17 |   | before you were baptized?                               | 11:40:21 |
| 18 | A | Yes.                                                    | 11:40:26 |
| 19 | Q | For how long before your baptism, were you a            | 11:40:27 |
| 20 |   | publisher in the congregation?                          | 11:40:31 |
| 21 | A | I don't remember if it was about six months or          | 11:40:40 |
| 22 |   | a year.                                                 | 11:40:44 |
| 23 | Q | After your baptism as one of the Jehovah's              | 11:40:47 |
| 24 |   | Witnesses in the Linda Vista Congregation, did you ever | 11:40:50 |
| 25 |   | serve as a ministerial servant?                         | 11:40:53 |

|    |   |                                                           |          |
|----|---|-----------------------------------------------------------|----------|
| 1  | A | A pushlisher is a person who preaches                     | 11:43:06 |
| 2  |   | home-to-home the good news, and he is authorized to       | 11:43:10 |
| 3  |   | preach this good news from door-to-door.                  | 11:43:17 |
| 4  | Q | Can I have a second.                                      | 11:43:24 |
| 5  |   | And who authorizes you to preach from                     | 11:43:40 |
| 6  |   | door-to-door, when you're a publisher of the good news in | 11:43:42 |
| 7  |   | the Kingdom of --                                         | 11:43:45 |
| 8  | A | The elders of the congregation and the                    | 11:44:03 |
| 9  |   | president of services -- I'm not sure. Service overseer.  | 11:44:07 |
| 10 | Q | Okay. And are all members of the congregation,            | 11:44:24 |
| 11 |   | authorized to preach the good news of the Kingdom?        | 11:44:27 |
| 12 |   | MR. STOREY: Objection. Vague and ambiguous.               | 11:44:38 |
| 13 |   | BY MR. MCCABE:                                            | 11:44:41 |
| 14 | Q | If you understand the question, you may answer            | 11:44:41 |
| 15 |   | it.                                                       | 11:44:42 |
| 16 | A | Yes.                                                      | 11:44:45 |
| 17 | Q | Did there come a time, when you left the Linda            | 11:44:49 |
| 18 |   | Vista Congregation and began associating with another     | 11:44:53 |
| 19 |   | congregation?                                             | 11:44:57 |
| 20 | A | No.                                                       | 11:45:10 |
| 21 | Q | So your entire life in the -- as one of                   | 11:45:10 |
| 22 |   | Jehovah's Witnesses, you spent in the Linda Vista         | 11:45:13 |
| 23 |   | Congregation?                                             | 11:45:16 |
| 24 | A | No.                                                       | 11:45:23 |
| 25 | Q | What other congregations did you associate                | 11:45:24 |



|    |   |                                                               |          |
|----|---|---------------------------------------------------------------|----------|
| 1  | A | Yes.                                                          | 11:56:02 |
| 2  | Q | And did you confess to her, that you                          | 11:56:03 |
| 3  |   | <u>sexually -- or tried to inappropriately touch her son?</u> | 11:56:06 |
| 4  | A | Yes.                                                          | 11:56:17 |
| 5  | Q | Okay. Did the elders talk to you after that                   | 11:56:19 |
| 6  |   | <u>incident had taken place?</u>                              | 11:56:23 |
| 7  | A | I remember that they did.                                     | 11:56:33 |
| 8  | Q | Do you remember what you told the elders, when                | 11:56:34 |
| 9  |   | <u>they talked to you about this incident?</u>                | 11:56:37 |
| 10 | A | Yes.                                                          | 11:56:49 |
| 11 | Q | What did you tell them?                                       | 11:56:49 |
| 12 | A | That we were doing something that wasn't                      | 11:57:04 |
| 13 |   | <u>appropriate and that's what I said.</u>                    | 11:57:07 |
| 14 | Q | Okay. Did you have a judicial committee for                   | 11:57:09 |
| 15 |   | <u>that incident?</u>                                         | 11:57:12 |
| 16 | A | No.                                                           | 11:57:17 |
| 17 | Q | Were you baptized, at the time of this incident               | 11:57:18 |
| 18 |   | <u>taking place?</u>                                          | 11:57:21 |
| 19 | A | Yes.                                                          | 11:57:27 |
| 20 | Q | Can you think of any reason, why there wasn't a               | 11:57:28 |
| 21 |   | <u>judicial committee for this incident?</u>                  | 11:57:31 |
| 22 | A | No.                                                           | 11:57:40 |
| 23 | Q | Do you know what elders you talked to?                        | 11:57:41 |
| 24 | A | I remember, yes.                                              | 11:57:53 |
| 25 | Q | Who?                                                          | 11:57:56 |

|    |   |                                                        |          |
|----|---|--------------------------------------------------------|----------|
| 1  | A | Brother Justino.                                       | 11:58:03 |
| 2  | Q | Is that Justino Diaz?                                  | 11:58:06 |
| 3  | A | Uh-huh.                                                | 11:58:08 |
| 4  |   | And Brother Ramirez. I don't remember his name         | 11:58:11 |
| 5  |   | exactly.                                               | 11:58:16 |
| 6  | Q | And would you say, what you told them was a            | 11:58:18 |
| 7  |   | <u>confession?</u>                                     | 11:58:21 |
| 8  | A | <u>Yes.</u>                                            | 11:58:28 |
| 9  | Q | And they didn't have a judicial committee to           | 11:58:29 |
| 10 |   | deal with that error that you had confessed.           | 11:58:34 |
| 11 |   | Is that correct?                                       | 11:58:38 |
| 12 |   | THE INTERPRETER: I'm sorry, can you repeat             | 11:58:39 |
| 13 |   | that?                                                  | 11:58:40 |
| 14 |   | BY MR. MCCABE:                                         | 11:58:41 |
| 15 | Q | They didn't have a judicial committee to deal          | 11:58:41 |
| 16 |   | with you, for the error that you confessed?            | 11:58:45 |
| 17 | A | No.                                                    | 11:58:50 |
| 18 | Q | Okay. What exactly did you confess to?                 | 11:58:51 |
| 19 | A | <u>That I had been playing and that's what I said,</u> | 11:59:13 |
| 20 |   | <u>that I had touched him inappropriately.</u>         | 11:59:17 |
| 21 | Q | Did you tell the elders, that you were trying          | 11:59:22 |
| 22 |   | to sexually molest Arturo?                             | 11:59:24 |
| 23 | A | No.                                                    | 11:59:39 |
| 24 | Q | Did you tell the elders, that you were sexually        | 11:59:40 |
| 25 |   | attracted to young boys?                               | 11:59:47 |

1 BY MR. MCCABE:

2 Q And you were aware that were you concealing  
3 this information, that the elders had a right to know.  
4

Is that true?

5 A Yes.

6 Q Now, I want to talk about Joel Gamboa.  
7

8 Did you have bible study with him?  
9

A Yes.

10 Q How did you happen to come to study the bible  
11 with Joel Gamboa? Were you appointed to do that by the  
12 elders?

A No.

13 Q How did it come about?

14 A His mother asked me, if I could provide him  
15 with studies.

16 Q Okay. Did he -- was his mother married at the  
17 time?

A No.

18 Q How many people were you studying the bible  
19 with at that time?  
20

A I don't remember.

21 Q Was it more than Joel Gamboa?  
22

A Yes, I think so.

23 Q Were they children?  
24

A No.  
25

12:55:34

12:55:34

12:55:39

12:55:44

12:55:51

12:55:54

12:56:01

12:56:08

12:56:09

12:56:12

12:56:16

12:56:26

12:56:27

12:56:31

12:56:34

12:56:35

12:56:40

12:56:42

12:56:44

12:56:47

12:56:56

12:56:58

12:57:05

12:57:06

12:57:09

|    |   |                                                          |          |
|----|---|----------------------------------------------------------|----------|
| 1  | Q | Were they people inside the congregation or              | 12:57:11 |
| 2  |   | outside the congregation?                                |          |
| 3  | A | Outside the congregation.                                | 12:57:13 |
| 4  | Q | Would they be people that you met going                  | 12:57:18 |
| 5  |   | door-to-door?                                            | 12:57:20 |
| 6  | A | Yes.                                                     | 12:57:23 |
| 7  | Q | And were they adults?                                    | 12:57:27 |
| 8  | A | Yes.                                                     | 12:57:27 |
| 9  | Q | What's Joel Gamboa's mother's name?                      | 12:57:30 |
| 10 | A | Humelina.                                                | 12:57:31 |
| 11 | Q | Do you know her last name?                               | 12:57:39 |
| 12 | A | I'm not sure if it's Hernandez.                          | 12:57:40 |
| 13 | Q | Were you friends with Humelina?                          | 12:57:46 |
| 14 | A | Yes.                                                     | 12:57:51 |
| 15 | Q | Did you see her at congregation meetings?                | 12:57:59 |
| 16 | A | Yes.                                                     | 12:58:00 |
| 17 | Q | What congregation did she attend?                        | 12:58:07 |
| 18 | A | Linda Vista.                                             | 12:58:09 |
| 19 | Q | Okay. Did she also attend the La Jolla                   | 12:58:14 |
| 20 |   | Congregation, when that was formed?                      | 12:58:16 |
| 21 | A | No.                                                      | 12:58:19 |
| 22 | Q | So did you continue to have bible studies when           | 12:58:26 |
| 23 |   | you were with Joel Gamboa, when you were in the La Jolla | 12:58:27 |
| 24 |   | Congregation?                                            | 12:58:30 |
| 25 | A | Yes.                                                     | 12:58:38 |
|    |   |                                                          | 12:58:38 |

|    |   |                                                          |          |
|----|---|----------------------------------------------------------|----------|
| 1  | Q | Is that a normal process that a person in one            | 12:58:39 |
| 2  |   | congregation, would study with a child in another        | 12:58:44 |
| 3  |   | congregation?                                            | 12:58:47 |
| 4  | A | No.                                                      | 12:58:54 |
| 5  | Q | Did the elders in the La Jolla Congregation,             | 12:58:55 |
| 6  |   | know that you were having bible study with Joel Gamboa?  | 12:58:58 |
| 7  | A | No.                                                      | 12:59:09 |
| 8  | Q | Did the elders in Linda Vista Congregation,              | 12:59:11 |
| 9  |   | know that you were having a bible study with Joel        | 12:59:14 |
| 10 |   | Gamboa?                                                  | 12:59:17 |
| 11 | A | I don't know.                                            | 12:59:24 |
| 12 | Q | Was it something that you tried to keep secret,          | 12:59:25 |
| 13 |   | you having a bible study with Joel Gamboa, from the      | 12:59:28 |
| 14 |   | elders?                                                  | 12:59:33 |
| 15 | A | No.                                                      | 12:59:42 |
| 16 | Q | I want to talk about now, when you were in the           | 12:59:51 |
| 17 |   | La Jolla Congregation and you were disfellowshipped.     | 12:59:55 |
| 18 |   | And that actually, the congregation was called           | 13:00:11 |
| 19 |   | "Playa Pacifica at that time, wasn't it?                 | 13:00:13 |
| 20 | A | Yes.                                                     | 13:00:20 |
| 21 | Q | And did the investigation into your serious sin          | 13:00:21 |
| 22 |   | of having sexual contact with minors, come to the elders | 13:00:25 |
| 23 |   | attention through John Dorman?                           | 13:00:29 |
| 24 | A | Yes.                                                     | 13:00:47 |
| 25 | Q | And you were a member of the body of elders, at          | 13:00:48 |

1 the time the report was made by the Dorman family about  
2 you.

13:00:53

3 Is that correct?

13:00:57

4 A Yes.

13:00:58

5 Q Do you know how the report from John Dorman  
6 reached the body of elders?

13:01:10

13:01:11

7 A No.

13:01:15

8 Q Do you know John Dorman's mother's name?

13:01:27

13:01:28

9 A Yes.

13:01:33

10 Q What is it?

13:01:34

11 A Manuela Dorman.

13:01:37

12 Q Was she a member of the Playa Pacifica  
13 Congregation?

13:01:40

13:01:44

14 A No.

13:01:49

15 Q Do you know where she lived at the time that  
16 you were serving at the Playa Pacifica Congregation?

13:01:50

13:01:54

17 A No.

13:02:02

18 Q Did she live in San Diego?

13:02:05

19 A She did before.

13:02:11

20 Q But when the report came about, that John  
21 Dorman had been abused by you, do you know where she was  
22 living?

13:02:12

13:02:15

23 A No.

13:02:20

13:02:29

24 Q Okay. Were you informed by anyone among the  
25 elders, that a report had been made, an accusation had

13:02:30

13:02:36

|    |                                                           |          |
|----|-----------------------------------------------------------|----------|
| 1  | been made against you by John Dorman?                     | 13:02:39 |
| 2  | A Yes.                                                    | 13:02:52 |
| 3  | Q Okay. Who informed you?                                 | 13:02:53 |
| 4  | A I don't remember who the brother was that told          | 13:03:01 |
| 5  | me.                                                       | 13:03:04 |
| 6  | Q Do you remember what they told you?                     | 13:03:04 |
| 7  | A That they had said that I had done that sin and         | 13:03:30 |
| 8  | they were talking about what I had done.                  | 13:03:35 |
| 9  | Q Okay. The first time that they talked to you            | 13:03:42 |
| 10 | about this accusation from John Dorman, did you tell them | 13:03:45 |
| 11 | that it took place?                                       | 13:03:49 |
| 12 | A Yes.                                                    | 13:04:00 |
| 13 | Q And when did you tell them it took place? What          | 13:04:00 |
| 14 | time period?                                              | 13:04:03 |
| 15 | A During the time that they were in the                   | 13:04:20 |
| 16 | congregation.                                             | 13:04:23 |
| 17 | Q And were the Dorman's ever in the congregation          | 13:04:23 |
| 18 | with you?                                                 | 13:04:26 |
| 19 | A Yes.                                                    | 13:04:31 |
| 20 | Q What congregation was that?                             | 13:04:32 |
| 21 | A In La Jolla.                                            | 13:04:39 |
| 22 | Q Were they ever in the Linda Vista Congregation          | 13:04:41 |
| 23 | with you?                                                 | 13:04:45 |
| 24 | A I don't remember if they had been in Linda              | 13:04:58 |
| 25 | vista. All I remember, is that they were there when the   | 13:05:00 |

|    |                                                                |          |
|----|----------------------------------------------------------------|----------|
| 1  | The time is 2:06 p.m.                                          | 14:06:16 |
| 2  | (Break.)                                                       | 14:09:14 |
| 3  | THE VIDEOGRAPHER: We're back on the record.                    | 14:09:15 |
| 4  | The time is 2:09 p.m.                                          | 14:09:16 |
| 5  | BY MR. MCCABE:                                                 | 14:09:21 |
| 6  | Q Mr. Campos, some time ago, I took the                        | 14:09:21 |
| 7  | <u>deposition of Joel Gamboa.</u>                              | 14:09:24 |
| 8  | And during the course of his deposition, I'll                  | 14:09:28 |
| 9  | <u>represent to you, that he told me that you sexually</u>     | 14:09:30 |
| 10 | <u>abused him for a period of six years, from the time he</u>  | 14:09:35 |
| 11 | <u>was eight years old until he moved to Phoenix, Arizona,</u> | 14:09:40 |
| 12 | <u>when he was 14 years of age.</u>                            | 14:09:43 |
| 13 | Did you sexually molest Joel Gamboa for a                      | 14:09:46 |
| 14 | <u>period of six years?</u>                                    | 14:09:49 |
| 15 | A Yes.                                                         | 14:10:26 |
| 16 | Q And he also told me, that you sexually abused                | 14:10:29 |
| 17 | <u>him sometimes two, three times a week.</u>                  | 14:10:34 |
| 18 | Is that true?                                                  | 14:10:37 |
| 19 | A Yes.                                                         | 14:10:46 |
| 20 | MR. MCCABE: I think that's all I have --                       | 14:10:55 |
| 21 | actually, I do have one more question.                         | 14:10:55 |
| 22 | Did you tell the judicial committee, that                      | 14:11:13 |
| 23 | that's what you did over that period of time for six           | 14:11:16 |
| 24 | years, you abused Joel Gamboa two, three times a week?         | 14:11:19 |
| 25 | A No.                                                          | 14:11:35 |



1 sure if I'm going to stay in that congregation, because  
2 I'm not sure how many congregations exist there in that  
3 place.

4 Q But that's where you intend to start?

5 A Yes.

6 COURT REPORTER: Can you please spell  
7 "Alfayucan"?

8 THE WITNESS: A-l-f-a-y-u-c-a-n.

9 BY MR. STOREY:

10 Q Is that -- how many words is that?

11 A Nine.

12 THE INTERPRETER: May I explain?

13 MR. STOREY: Yes.

14 THE WITNESS: Two.

15 BY MR. STOREY:

16 Q Okay.

17 What's the process to become baptized, as one  
18 of Jehovah's Witnesses?

19 A So some questions are asked of you to see if  
20 you fill the requirements to be baptized.

21 Q Who asks the questions?

22 A One or two of the elders are named in the  
23 congregation to ask questions.

24 Q How many questions?

25 A I don't remember, maybe 80 questions. I don't

14:20:02

14:20:06

14:20:09

14:20:12

14:20:17

14:20:29

14:20:29

14:20:29

14:21:01

14:21:01

14:21:20

14:21:24

14:21:26

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14:21:47

14:22:05

14:22:13

14:22:18

14:22:31

14:22:36

14:22:39

14:22:53

|    |                                                                  |          |
|----|------------------------------------------------------------------|----------|
| 1  | remember.                                                        | 14:23:00 |
| 2  | Q Is everyone asked the same set of questions?                   | 14:23:00 |
| 3  | A Yes.                                                           | 14:23:11 |
| 4  | Q Do you have to get a certain number of                         | 14:23:14 |
| 5  | questions right, to be baptized?                                 | 14:23:17 |
| 6  | A Yes. <u>It doesn't have to be necessarily</u>                  | 14:23:46 |
| 7  | <u>correct, but you have to transmit some kind of idea about</u> | 14:23:48 |
| 8  | <u>the question.</u>                                             | 14:23:56 |
| 9  | Q <u>Did the questions involve the bible?</u>                    | 14:23:59 |
| 10 | A Yes.                                                           | 14:24:04 |
| 11 | Q <u>Do you have to study the bible, to be able to</u>           | 14:24:08 |
| 12 | <u>answer those questions?</u>                                   | 14:24:11 |
| 13 | A Yes.                                                           | 14:24:15 |
| 14 | Q <u>And did you study the bible, before you</u>                 | 14:24:18 |
| 15 | <u>attempted to become baptized?</u>                             | 14:24:21 |
| 16 | A Yes.                                                           | 14:24:25 |
| 17 | Q <u>For how long?</u>                                           | 14:24:26 |
| 18 | A <u>I'm not sure, if it was about six months or</u>             | 14:24:38 |
| 19 | <u>almost a year.</u>                                            | 14:24:40 |
| 20 | Q Did you study on your own?                                     | 14:24:42 |
| 21 | A Can you repeat the question?                                   | 14:24:52 |
| 22 | Q Did you study by yourself?                                     | 14:24:54 |
| 23 | MR. MORENO: I'm sorry, you said "trabajaba,"                     | 14:25:00 |
| 24 | he meant "study."                                                | 14:25:05 |
| 25 | THE INTERPRETER: Oh, I'm sorry; "study."                         | 14:25:23 |

|    |                                                          |          |
|----|----------------------------------------------------------|----------|
| 1  | THE WITNESS: I would prepare a study myself              | 14:25:24 |
| 2  | and then another brother would come and study with me.   | 14:25:28 |
| 3  | Q Was it always the same brother?                        | 14:25:34 |
| 4  | A Yes.                                                   | 14:25:37 |
| 5  | Q What brother?                                          | 14:25:40 |
| 6  | A Ramon.                                                 | 14:25:43 |
| 7  | Q How frequently did you study with Ramon?               | 14:25:45 |
| 8  | A Each week.                                             | 14:25:54 |
| 9  | Q Once each week?                                        | 14:25:59 |
| 10 | A Yes.                                                   | 14:26:00 |
| 11 | Q What does it mean to be baptized, as one of            | 14:26:16 |
| 12 | Jehovah's Witnesses?                                     | 14:26:20 |
| 13 | A That one recognizes that one is a servant of           | 14:26:47 |
| 14 | Jehovah. And that one fulfills the requirements morally, | 14:26:51 |
| 15 | so that you can be baptized.                             | 14:27:14 |
| 16 | Q Is baptism as one of Jehovah's Witnesses,              | 14:27:21 |
| 17 | considered to be an ordination as a minister?            | 14:27:25 |
| 18 | A Yes.                                                   | 14:27:40 |
| 19 | Q Prior to being baptized, were you a                    | 14:27:52 |
| 20 | publisher?                                               | 14:27:56 |
| 21 | A Yes.                                                   | 14:27:58 |
| 22 | Q What did you have to do to become a                    | 14:28:00 |
| 23 | publisher?                                               | 14:28:02 |
| 24 | A You need to have studied. We need to have              | 14:28:44 |
| 25 | studied the whole book. A book that they have to become  | 14:28:47 |

|    |                                                         |          |
|----|---------------------------------------------------------|----------|
| 1  | School, after you become a publisher?                   | 14:31:10 |
| 2  | A Yes.                                                  | 14:31:16 |
| 3  | Q Can you attend all of the congregation's              | 14:31:19 |
| 4  | meetings, before you become a publisher?                | 14:31:23 |
| 5  | A Yes.                                                  | 14:31:31 |
| 6  | Q Even the ones in peoples private homes?               | 14:31:32 |
| 7  | A Yes.                                                  | 14:31:43 |
| 8  | Q What's the difference between being a baptized        | 14:31:50 |
| 9  | publisher and an unbaptized publisher?                  | 14:31:53 |
| 10 | A The published -- the baptized publisher can           | 14:32:52 |
| 11 | receive privileges within the congregation.             | 14:33:11 |
| 12 | And a non-baptized one, has to wait until he            | 14:33:21 |
| 13 | qualifies to become a publisher.                        | 14:33:24 |
| 14 | Q What privileges can a baptized publisher              | 14:33:26 |
| 15 | receive?                                                | 14:33:30 |
| 16 | A He can participate in the school and then with        | 14:33:55 |
| 17 | time, he can receive certain privileges if he's a male, | 14:33:57 |
| 18 | such as becoming a ministerial servant or elder.        | 14:34:01 |
| 19 | And also, he can become an auxiliary pioneer            | 14:34:17 |
| 20 | and some other privileges.                              | 14:34:26 |
| 21 | Q Can an unbaptized publisher be                        | 14:34:33 |
| 22 | disfellowshipped?                                       | 14:34:36 |
| 23 | A No.                                                   | 14:34:46 |
| 24 | Q Can a person who is becoming a baptized               | 14:34:49 |
| 25 | publisher, be disfellowshipped for some sin committed   | 14:34:52 |

1 prior to his baptism?

2 A They can talk to him, but no -- but he's not  
3 baptized.

4 Q Are there any other privileges that a baptized  
5 publisher has, that an unbaptized publisher does not  
6 have?

7 A A baptized publisher can work as a missionary.  
8 He can work in also any of the annexes in the world.

9 Q Are male baptized publishers and female  
10 baptized publishers, given all of the same rights and  
11 responsibilities?

12 A No.

13 Q What are the differences?

14 A A male can preside over the congregation, while  
15 a female cannot preside over the congregation when  
16 everybody is there.

17 And the woman cannot represent the congregation  
18 in public; in prayer.

19 Q Can a female lead field service?

20 A If the situation calls for it, yes. But if  
21 there is a male present, then she has to cover her head.

22 And even if a man were not present, she would  
23 still have to cover her head.

24 Q If a man was present, a baptized male was  
25 present for field service, could a baptized female lead

14:34:56

14:35:20

14:35:26

14:35:30

14:35:34

14:35:39

14:36:00

14:36:06

14:36:17

14:36:21

14:36:26

14:36:37

14:36:38

14:36:52

14:36:54

14:36:59

14:37:09

14:37:13

14:37:24

14:37:48

14:37:51

14:38:00

14:38:08

14:38:18

14:38:22

|    |                |                                                 |          |
|----|----------------|-------------------------------------------------|----------|
| 1  | Q              | How does covering her head, show respect to the | 14:42:29 |
| 2  |                | angels?                                         |          |
| 3  |                |                                                 | 14:42:32 |
| 4  | MR. MCCABE:    | Objection. Grounds of relevancy.                | 14:42:32 |
| 5  |                | This is getting into matters of doctrine. This  | 14:42:34 |
| 6  |                | is not an expert witness.                       | 14:42:38 |
| 7  |                | And why don't you get down to cross-examining?  | 14:42:43 |
| 8  | BY MR. STOREY: |                                                 | 14:42:57 |
| 9  | Q              | Go ahead and answer.                            | 14:42:57 |
| 10 |                | (Record read.)                                  | 14:43:08 |
| 11 | THE WITNESS:   | Because, to show respect for the                | 14:43:13 |
| 12 |                | angels.                                         | 14:43:15 |
| 13 | BY MR. STOREY: |                                                 | 14:43:22 |
| 14 | Q              | Do publishers report the number of hours they   | 14:43:22 |
| 15 |                | spend in field service to the congregation?     | 14:43:25 |
| 16 | A              | Yes.                                            | 14:43:35 |
| 17 | Q              | Do they report it in writing?                   | 14:43:37 |
| 18 | A              | Yes.                                            | 14:43:42 |
| 19 | Q              | Is it a form provided by the congregation?      | 14:43:43 |
| 20 | A              | Yes.                                            | 14:43:49 |
| 21 | Q              | Okay. What is the form called?                  | 14:43:50 |
| 22 | A              | "Service Report."                               | 14:43:56 |
| 23 | Q              | Who do publishers give that form to, at the     | 14:43:59 |
| 24 |                | congregation?                                   | 14:44:03 |
| 25 | A              | To the congregation secretary.                  | 14:44:10 |
|    | Q              | Did you fill out that form, when you were a     | 14:44:13 |

|    |                                                  |          |
|----|--------------------------------------------------|----------|
| 1  | <u>publisher?</u>                                | 14:44:15 |
| 2  | A Yes.                                           |          |
| 3  | Q How frequently did you fill it out?            | 14:44:19 |
| 4  | A Each month.                                    | 14:44:19 |
| 5  | Q And did you turn them in, to the               | 14:44:24 |
| 6  | congregation?                                    | 14:44:27 |
| 7  | A Yes.                                           | 14:44:29 |
| 8  | Q Do publishers who give bible study, fill out a | 14:44:31 |
| 9  | <u>form?</u>                                     | 14:44:36 |
| 10 | A Yes.                                           | 14:44:42 |
| 11 | Q And do they turn those forms in, to the        | 14:44:50 |
| 12 | <u>congregation?</u>                             | 14:44:55 |
| 13 | A Yes.                                           | 14:44:57 |
| 14 | Q To who at the congregation?                    | 14:45:00 |
| 15 | A To the secretary.                              | 14:45:02 |
| 16 | Q Do they fill out a separate form, for each     | 14:45:05 |
| 17 | <u>bible study they give?</u>                    | 14:45:06 |
| 18 | A Yes.                                           | 14:45:09 |
| 19 | Q How frequently do you fill out that form?      | 14:45:17 |
| 20 | A Each month.                                    | 14:45:19 |
| 21 | Q Did you ever fill out that form?               | 14:45:25 |
| 22 | A Yes.                                           | 14:45:31 |
| 23 | Q Did you always fill out that form, after you'd | 14:45:37 |
| 24 | <u>given a bible study?</u>                      | 14:45:39 |
| 25 | A Yes.                                           | 14:45:42 |
|    |                                                  | 14:45:46 |

|    |   |                                                                  |          |
|----|---|------------------------------------------------------------------|----------|
| 1  | Q | And did you always turn it in, to the                            | 14:45:47 |
| 2  |   | <u>congregation secretary?</u>                                   | 14:45:49 |
| 3  | A | <u>Yes.</u>                                                      | 14:45:55 |
| 4  | Q | Were you ever a congregation secretary?                          | 14:46:11 |
| 5  | A | Yes.                                                             | 14:46:16 |
| 6  | Q | And did you ever receive any of those bible                      | 14:46:17 |
| 7  |   | study "report forms"?                                            | 14:46:20 |
| 8  | A | Yes.                                                             | 14:46:25 |
| 9  | Q | What did you do with them?                                       | 14:46:26 |
| 10 | A | They're all filed in the congregation file.                      | 14:46:35 |
| 11 | Q | How long are they kept?                                          | 14:46:38 |
| 12 |   | MR. COPLEY: Objection. Vague as to time.                         | 14:46:48 |
| 13 |   | THE WITNESS: I don't remember.                                   | 14:46:54 |
| 14 |   | BY MR. STOREY:                                                   | 14:46:55 |
| 15 | Q | In the bible study form, do you identify --                      | 14:47:13 |
| 16 |   | scratch that. Let me restate this question.                      | 14:47:15 |
| 17 |   | <u>Does the bible study form, require you to</u>                 | 14:47:19 |
| 18 |   | <u>identify the person who received the bible study</u>          | 14:47:20 |
| 19 |   | <u>session?</u>                                                  | 14:47:23 |
| 20 | A | <u>Yes.</u>                                                      | 14:47:32 |
| 21 | Q | Is it fair to say, that a congregation                           | 14:47:34 |
| 22 |   | <u>secretary would know or at least could know, if they read</u> | 14:47:37 |
| 23 |   | <u>the forms, all of the publishers who gave the bible study</u> | 14:47:40 |
| 24 |   | <u>session and all of the people who received that bible</u>     | 14:47:43 |
| 25 |   | <u>study session?</u>                                            | 14:47:48 |



|    |   |                                                         |          |
|----|---|---------------------------------------------------------|----------|
| 1  | A | <u>Yes.</u>                                             | 14:48:00 |
| 2  | Q | What is a pioneer?                                      | 14:48:04 |
| 3  | A | It's a member of a congregation who has                 | 14:48:27 |
| 4  |   | shown -- been shown to have filled a certain amount of  | 14:48:30 |
| 5  |   | hours during certain activities in the congregation.    | 14:48:41 |
| 6  | Q | Are there different kinds of pioneers?                  | 14:48:45 |
| 7  | A | Yes.                                                    | 14:48:50 |
| 8  | Q | What are they?                                          | 14:48:52 |
| 9  | A | There is an auxiliary pioneer and regular               | 14:48:58 |
| 10 |   | pioneer, and a special pioneer.                         | 14:49:03 |
| 11 | Q | Were you ever a regular pioneer?                        | 14:49:08 |
| 12 | A | No.                                                     | 14:49:16 |
| 13 | Q | Were you ever an auxiliary pioneer?                     | 14:49:17 |
| 14 | A | Yes.                                                    | 14:49:26 |
| 15 | Q | When?                                                   | 14:49:27 |
| 16 | A | I don't remember exactly what years. I didn't           | 14:49:31 |
| 17 |   | do it regularly. It was sometimes I'd do it for a month | 14:50:03 |
| 18 |   | or a period of time.                                    | 14:50:07 |
| 19 |   | And I think, it might have been in '98 or '99.          | 14:50:09 |
| 20 |   | I don't remember.                                       | 14:50:21 |
| 21 | Q | Weren't you disfellowshipped in '98 or '99?             | 14:50:23 |
| 22 | A | I'm getting confused by the years. It was in            | 14:50:39 |
| 23 |   | '95.                                                    | 14:50:43 |
| 24 | Q | What about before '95?                                  | 14:50:44 |
| 25 | A | I was an auxiliary pioneer for -- from                  | 14:50:58 |

1 basis of this document. It doesn't indicate what your  
2 suggestion is.

15:20:54

3 BY MR. STOREY:

15:20:56

4 Q Mr. McCabe made an objection and rather than  
5 have you answer this question, I'll ask a different one.

15:21:15

15:21:15

6 What does that notation next to your name  
7 mean?

15:21:18

15:21:25

8 A I don't understand.

15:21:28

9 Q You don't know what it means to have those  
10 initials PREC/AUX space REG, next to your name?

15:21:40

15:21:44

11 A No.

15:21:49

12 Q Were you an elder in the La Jolla Spanish  
13 Congregation?

15:22:04

15:22:04

14 A Yes.

15:22:08

15 Q As an elder, did you take part in filling out  
16 this form at any time?

15:22:17

15:22:18

17 A No.

15:22:20

18 Q Do you know what this form is?

15:22:31

19 A Yes.

15:23:43

20 Q What is it?

15:23:51

15:23:52

21 A It's the form that is given to the presiding --  
22 the presiding circuit overseer, I believe; presiding  
23 overseer.

15:24:02

15:24:11

24 Q Do you know what congregation this forms  
25 relates to?

15:24:20

15:24:21

15:24:23

|    |   |                                                 |          |
|----|---|-------------------------------------------------|----------|
| 1  | A | Yes.                                            | 15:24:29 |
| 2  | Q | What congregation?                              | 15:24:29 |
| 3  | A | Playa Pacifica.                                 | 15:24:33 |
| 4  | Q | What dates did the circuit overseer visit Playa | 15:24:35 |
| 5  |   | <u>Pacifica?</u>                                | 15:24:47 |
| 6  |   | MR. COPLEY: Objection; speculation. Also        | 15:24:48 |
| 7  |   | vague.                                          | 15:24:53 |
| 8  |   | THE WITNESS: From the 15th to the 20th of       | 15:25:12 |
| 9  |   | <u>November of '94.</u>                         | 15:25:14 |
| 10 |   | BY MR. STOREY:                                  | 15:25:15 |
| 11 | Q | Do you see your name on the first page of this  | 15:25:15 |
| 12 |   | <u>form?</u>                                    | 15:25:17 |
| 13 | A | Yes.                                            | 15:25:20 |
| 14 | Q | Do you see that it's next to the word,          | 15:25:22 |
| 15 |   | <u>"secretario"?</u>                            | 15:25:26 |
| 16 | A | Yes.                                            | 15:25:29 |
| 17 | Q | Does that mean, that you were the congregation  | 15:25:32 |
| 18 |   | <u>secretary at that time?</u>                  | 15:25:40 |
| 19 | A | Yes.                                            | 15:25:41 |
| 20 | Q | Please look at Page 2.                          | 15:25:50 |
| 21 |   | (Witness complies.)                             | 15:26:01 |
| 22 |   | Please look at Item 7, at the top.              | 15:26:02 |
| 23 |   | (Witness complies.)                             | 15:26:05 |
| 24 | A | Yes.                                            | 15:26:41 |
| 25 | Q | Please look at the second sentence under, "Item | 15:26:41 |

|    |                                                            |          |
|----|------------------------------------------------------------|----------|
| 1  | 7," one that beings with, "uno de ellos."                  | 15:26:45 |
| 2  | (Witness complies.)                                        | 15:26:54 |
| 3  | A Yes.                                                     | 15:26:55 |
| 4  | Q Does that sentence indicate that you were                | 15:26:57 |
| 5  | <u>serving as an auxiliary pioneer at the time of this</u> | 15:26:59 |
| 6  | <u>visit?</u>                                              | 15:27:02 |
| 7  | A Yes.                                                     | 15:27:10 |
| 8  | Q I'm going to mark this copy No. 4; Exhibit 4.            | 15:27:22 |
| 9  | (Plaintiff's Exhibit 4, marked for                         | 15:28:11 |
| 10 | identification.)                                           | 15:28:11 |
| 11 | BY MR. STOREY:                                             | 15:28:11 |
| 12 | Q Do you know what this document is?                       | 15:28:11 |
| 13 | A Yes.                                                     | 15:28:17 |
| 14 | Q Is it the same form, document that we discussed          | 15:28:18 |
| 15 | a minute ago as a new exhibit?                             | 15:28:22 |
| 16 | MR. MCCABE: You mean, same class?                          | 15:28:30 |
| 17 | MR. STOREY: Same class of documents.                       | 15:28:32 |
| 18 | THE WITNESS: Yes.                                          | 15:28:34 |
| 19 | BY MR. STOREY:                                             | 15:28:37 |
| 20 | Q Do you see your name on Page 2 of this                   | 15:28:37 |
| 21 | document, below the name "Richard J. Bacon"?               | 15:28:39 |
| 22 | A Yes.                                                     | 15:28:47 |
| 23 | Q Okay.                                                    | 15:28:48 |
| 24 | On the far right-hand side, do you see the                 | 15:28:49 |
| 25 | entry "CBSC; SEC; AUX/PRE/REG;"?                           | 15:28:52 |

|    |                 |                                                        |          |
|----|-----------------|--------------------------------------------------------|----------|
| 1  | A               | Uh-huh; yes.                                           | 15:29:02 |
| 2  | Q               | Okay. What does the word or the initials,              | 15:29:04 |
| 3  |                 | "SEC" mean?                                            | 15:29:09 |
| 4  | A               | I don't know. I don't remember and I don't             | 15:29:19 |
| 5  |                 | know.                                                  | 15:29:24 |
| 6  | Q               | Do you see the signature block in the                  | 15:29:24 |
| 7  |                 | <u>right-hand corner of this page?</u>                 | 15:29:27 |
| 8  | A               | <u>Yes.</u>                                            | 15:29:28 |
| 9  | Q               | Do you see the second line with the word               | 15:29:31 |
| 10 |                 | <u>"secretario" written on the bottom of the line?</u> | 15:29:35 |
| 11 | A               | (No verbal response.)                                  | 15:29:54 |
| 12 | Q               | <u>In the top right-hand corner.</u>                   | 15:29:55 |
| 13 | A               | <u>Oh, yes.</u>                                        | 15:29:58 |
| 14 | Q               | Is that your signature above the word                  | 15:29:59 |
| 15 |                 | <u>"secretario"?</u>                                   | 15:30:01 |
| 16 | A               | <u>Yes.</u>                                            | 15:30:02 |
| 17 | Q               | Does that mean, that you were the secretary of         | 15:30:05 |
| 18 |                 | <u>the congregation at the time of this report?</u>    | 15:30:08 |
| 19 | A               | <u>Yes.</u>                                            | 15:30:11 |
| 20 | COURT REPORTER: | Is this Exhibit 5?                                     | 15:30:29 |
| 21 | MR. STOREY:     | Yes.                                                   | 15:30:29 |
| 22 |                 | (Plaintiff's Exhibit 5 marked for                      | 15:30:30 |
| 23 |                 | identification.)                                       | 15:30:30 |
| 24 | MR. MORENO:     | What number is this?                                   | 15:30:43 |
| 25 | MR. STOREY:     | This will be 6.                                        | 15:30:44 |

(Plaintiff's Exhibit 6, marked for  
identification.)

BY MR. STOREY:

Q What is this document?

A When there was a change in the presiding  
overseer.

Q And is this letter written to or written from  
the service committee of the Playa Pacifica  
Congregation?

A Yes.

Q And what's the date of this document?

A April 4th of '95.

Q Do you see your signature on this document?

A Yes.

Q Do you see the words underneath your  
signature?

A Yes.

Q "Gonzalo campos SEC period"?

A Yes.

Q Does that mean, that you were the secretary of  
the congregation on April 4, 1995?

A Yes.

Q Would you please take a look at Exhibit 4, that  
is the circuit overseer report.

(Witness complies.)

15:31:29

15:31:29

15:31:29

15:31:29

15:31:39

15:31:45

15:31:47

15:31:50

15:31:56

15:32:04

15:32:05

15:32:12

15:32:16

15:32:21

15:32:22

15:32:25

15:32:29

15:32:31

15:32:34

15:32:35

15:32:37

15:32:44

15:33:31

15:33:34

15:33:42

1 MR. MORENO: What counsel? What's the date on 15:33:45  
2 that? 15:33:46

3 MR. STOREY: I think it's November 15th-to-20th 15:33:47  
4 of 1994. 15:33:49

5 Q We discussed this document just a minute ago, 15:33:54  
6 and we determined that you were the secretary of the 15:33:56  
7 congregation at the time this document is prepared. 15:33:59

8 Is that correct? 15:34:02

9 A Yes. 15:34:03

10 Q At this time, as of December 1994, are you 15:34:19  
11 aware as to whether John Dorman's mother had made a 15:34:24  
12 complaint to the elders about your sexual abuse of 15:34:28  
13 John? 15:34:56

14 A Yes. 15:35:00

15 Q So at the time that this document was prepared, 15:35:01  
16 John Dorman, however, accused you of sexually molesting 15:35:05  
17 him? 15:35:11

18 A I don't know exactly the date. I don't 15:35:24  
19 remember. 15:35:29

20 Q Maybe this will help (indicating.) 15:35:42

21 A Yes. 15:36:15

22 Q Is this document -- what's the date of this 15:36:18  
23 document? 15:36:20

24 A June 13th of '94. 15:36:26

25 Q Actually, that's just the date stamp at the top 15:36:29

|    |                                                                 |          |
|----|-----------------------------------------------------------------|----------|
| 1  | right-hand corner.                                              | 15:36:32 |
| 2  | A The 9th of June.                                              | 15:36:35 |
| 3  | Q And what is this document?                                    | 15:36:36 |
| 4  | A The accusation that John Dorman made; his                     | 15:36:58 |
| 5  | mother made.                                                    | 15:37:01 |
| 6  | Q Okay. Did you ever see this document?                         | 15:37:05 |
| 7  | COURT REPORTER: What exhibit number is that,                    | 15:37:27 |
| 8  | counsel?                                                        | 15:37:29 |
| 9  | MR. STOREY: This will be 7.                                     | 15:37:31 |
| 10 | THE WITNESS: I think.                                           | 15:37:41 |
| 11 | (Plaintiff's Exhibit 7, marked for                              | 15:37:41 |
| 12 | identification.)                                                | 15:37:41 |
| 13 | BY MR. STOREY:                                                  | 15:37:41 |
| 14 | Q <u>Can you explain how the congregation can</u>               | 15:37:41 |
| 15 | <u>receive this letter in June, accusing you of molesting a</u> | 15:37:45 |
| 16 | <u>child and permitted you to serve as the congregation's</u>   | 15:37:49 |
| 17 | <u>secretary in November?</u>                                   | 15:37:54 |
| 18 | MR. COPLEY: Objection. Argumentative; vague.                    | 15:37:56 |
| 19 | THE WITNESS: I don't know.                                      | 15:38:51 |
| 20 | BY MR. STOREY:                                                  | 15:38:54 |
| 21 | Q Do you remember speaking to anybody about this                | 15:38:54 |
| 22 | letter?                                                         | 15:38:58 |
| 23 | MR. MCCABE: Do you mean, at the time of its                     | 15:39:03 |
| 24 | receipt? Or --                                                  | 15:39:04 |
| 25 | MR. STOREY: At the time of its receipt.                         | 15:39:05 |



|    |                                                           |          |
|----|-----------------------------------------------------------|----------|
| 1  | with, "Abuso sexual"?                                     | 16:29:38 |
| 2  | A Yes.                                                    | 16:29:46 |
| 3  | Q Is that a sexual abuse of a minor, starting             | 16:29:49 |
| 4  | <u>December 1991 and ending in December of 1994?</u>      | 16:29:51 |
| 5  | A Yes.                                                    | 16:30:04 |
| 6  | Q The abuse included mutual masturbation, anal            | 16:30:07 |
| 7  | <u>and oral sex?</u>                                      | 16:30:10 |
| 8  | A Yes.                                                    | 16:30:19 |
| 9  | Q Who is this document talking about? What                | 16:30:23 |
| 10 | <u>child?</u>                                             | 16:30:25 |
| 11 | A Joel.                                                   | 16:30:31 |
| 12 | Q Joel Gamboa?                                            | 16:30:36 |
| 13 | A Yes.                                                    | 16:30:39 |
| 14 | Q Do you see the sentence that says, "After his           | 16:30:47 |
| 15 | baptism in 1980, he sexually abused three children in the | 16:30:51 |
| 16 | congregation?"                                            | 16:30:55 |
| 17 | A Yes.                                                    | 16:31:07 |
| 18 | Q What three children are they talking about?             | 16:31:08 |
| 19 | A Rivera.                                                 | 16:31:15 |
| 20 | Q Which Riveras?                                          | 16:31:19 |
| 21 | A Roberto Rivera.                                         | 16:31:24 |
| 22 | Q Roberto Rivera's children?                              | 16:31:26 |
| 23 | A Yes.                                                    | 16:31:32 |
| 24 | Q John Rivera?                                            | 16:31:33 |
| 25 | A Yes.                                                    | 16:31:34 |

1 Q Did Celia have children? 16:54:40  
2 A No. 16:54:43  
3 Q Why did you stop living with Celia? 16:54:45  
4 A We moved and she also moved. 16:54:53  
5 Q Describe what happened with [REDACTED] in 16:55:02  
6 1982? 16:55:09  
7 A No, I don't want to. 16:55:27  
8 Q I'm sure you don't. I'm sure it's 16:55:36  
9 uncomfortable to talk about, but I need you to tell me 16:55:38  
10 what happened with [REDACTED] in 1982. 16:55:41  
11 A I don't feel comfortable saying it. All of 16:55:59  
12 this hurts me. 16:56:15  
13 Q If you don't tell me today, I'm going to have 16:56:20  
14 to go to court and try to get a court order compelling 16:56:23  
15 you to come back and tell me. 16:56:27  
16 A I did abuse him. 16:56:45  
17 MR. MORENO: Can you speak in a louder voice, 16:56:49  
18 please. 16:56:53  
19 THE INTERPRETER: Yes. 16:56:55  
20 THE WITNESS: I tried to touch him 16:56:56  
21 inappropriately. 16:56:57  
22 BY MR. STOREY: 16:57:00  
23 Q Did you share a room with [REDACTED]? 16:57:00  
24 A I think so. I don't remember. 16:57:17  
25 Q Did you have your own bed? 16:57:19

|    |   |                                                   |          |
|----|---|---------------------------------------------------|----------|
| 1  | A | Yes.                                              | 16:57:23 |
| 2  | Q | Did the incident with [REDACTED] happen at night? | 16:57:27 |
| 3  | A | Yes.                                              | 16:57:31 |
| 4  | Q | Was he asleep?                                    | 16:57:32 |
| 5  | A | Yes.                                              | 16:57:34 |
| 6  | Q | Did you approach his bed, while he was            | 16:57:37 |
| 7  |   | asleep?                                           | 16:57:39 |
| 8  | A | Yes.                                              | 16:57:41 |
| 9  | Q | Did you uncover him?                              | 16:57:44 |
| 10 | A | Yes.                                              | 16:57:47 |
| 11 | Q | Did you pull down his pants?                      | 16:57:48 |
| 12 | A | Yes.                                              | 16:57:52 |
| 13 | Q | Did you touch his genitals?                       | 16:57:54 |
| 14 | A | Yes.                                              | 16:58:00 |
| 15 | Q | Did you touch his buttocks?                       | 16:58:01 |
| 16 | A | Yes.                                              | 16:58:04 |
| 17 | Q | Did you expose your penis or genitals?            | 16:58:06 |
| 18 | A | Yes.                                              | 16:58:11 |
| 19 | Q | Did you touch [REDACTED] with your penis?         | 16:58:18 |
| 20 | A | Yes.                                              | 16:58:25 |
| 21 | Q | Did you penetrate [REDACTED]?                     | 16:58:26 |
| 22 | A | No.                                               | 16:58:30 |
| 23 | Q | Did this happen on one occasion?                  | 16:58:33 |
| 24 | A | Yes.                                              | 16:58:36 |
| 25 | Q | How did it stop?                                  | 16:58:40 |

|    |                |                                                        |          |
|----|----------------|--------------------------------------------------------|----------|
| 1  | A              | He became aware. He got up and he called his           | 16:58:57 |
| 2  |                | mother. That's what I remember.                        | 16:59:00 |
| 3  | Q              | <u>Was his mother angry, when you talked to her</u>    | 16:59:17 |
| 4  |                | <u>after this?</u>                                     | 16:59:20 |
| 5  | A              | <u>Yes.</u>                                            | 16:59:26 |
| 6  | Q              | Did she ask you to leave the house?                    | 16:59:28 |
| 7  | A              | Yes.                                                   | 16:59:31 |
| 8  | Q              | Did she tell you if she was going to inform the        | 16:59:34 |
| 9  |                | elders of the congregation?                            | 16:59:36 |
| 10 | A              | I don't remember.                                      | 16:59:41 |
| 11 | Q              | Did you approach the elders of the congregation        | 16:59:57 |
| 12 |                | about the incident?                                    | 17:00:00 |
| 13 | A              | I don't remember.                                      | 17:00:04 |
| 14 | Q              | Did they approach you?                                 | 17:00:05 |
| 15 | MR. COPLEY:    | Objection. Assumes facts not in                        | 17:00:10 |
| 16 |                | evidence he was notified.                              | 17:00:13 |
| 17 | THE WITNESS:   | I don't remember.                                      | 17:00:17 |
| 18 | BY MR. STOREY: |                                                        | 17:00:18 |
| 19 | Q              | <u>Who did you speak to from the congregation?</u>     | 17:00:21 |
| 20 |                | <u>The Linda Vista Congregation about [REDACTED]'s</u> | 17:00:24 |
| 21 |                | <u>complaint?</u>                                      | 17:00:32 |
| 22 | A              | <u>I don't remember.</u>                               | 17:00:33 |
| 23 | Q              | <u>Did you speak to Justino Diaz?</u>                  | 17:00:35 |
| 24 | A              | <u>No. No, I don't remember.</u>                       | 17:00:42 |
| 25 | Q              | <u>You testified earlier today, that you admitted</u>  | 17:00:53 |

|    |                                                               |          |
|----|---------------------------------------------------------------|----------|
| 1  | MR. MCCABE: Objection. Assumes facts not in                   | 17:03:40 |
| 2  | evidence and draws a conclusion.                              | 17:03:42 |
| 3  | MR. COPLEY: Join. I'll join, also vague as to                 | 17:03:47 |
| 4  | time.                                                         | 17:03:49 |
| 5  | THE INTERPRETER: Can you repeat the question,                 | 17:03:50 |
| 6  | please?                                                       | 17:03:52 |
| 7  | MR. STOREY: I might as well address all those                 | 17:03:53 |
| 8  | objections, while I'm at it.                                  | 17:03:55 |
| 9  | Q Did you speak to anyone, other than Justino                 | 17:03:57 |
| 10 | Diaz and Brother Ramirez at the time of this conduct,         | 17:04:01 |
| 11 | with [REDACTED]?                                              | 17:04:04 |
| 12 | A No.                                                         | 17:04:07 |
| 13 | Q <u>Was any announcement made to the congregation</u>        | 17:04:23 |
| 14 | <u>about this complaint?</u>                                  | 17:04:27 |
| 15 | A <u>I don't remember. Not that I remember.</u>               | 17:04:33 |
| 16 | Q <u>Were your service privileges in any way</u>              | 17:04:39 |
| 17 | <u>suspended and eliminated, after you attempted to touch</u> | 17:04:42 |
| 18 | <u>[REDACTED]?</u>                                            | 17:04:46 |
| 19 | A <u>No.</u>                                                  | 17:04:56 |
| 20 | Q <u>Were you allowed to continue to perform field</u>        | 17:05:00 |
| 21 | <u>service, after you attempted to touch [REDACTED]</u>       | 17:05:02 |
| 22 | <u>inappropriately?</u>                                       | 17:05:09 |
| 23 | A <u>Yes. But I don't remember very well</u>                  | 17:05:20 |
| 24 | <u>everything.</u>                                            | 17:05:24 |
| 25 | Q <u>Were you allowed to continue to give bible</u>           | 17:05:26 |

|    |                                                                        |          |
|----|------------------------------------------------------------------------|----------|
| 1  | study lessons to children, after you attempted to touch                | 17:05:28 |
| 2  | <u>                    </u> inappropriately?                           | 17:05:33 |
| 3  | A Yes.                                                                 | 17:05:44 |
| 4  | Q Did you stop being a publisher, after you                            | 17:05:47 |
| 5  | attempted to touch <u>                    </u> inappropriately at that | 17:05:50 |
| 6  | <u>time?</u>                                                           | 17:05:55 |
| 7  | A No.                                                                  | 17:06:01 |
| 8  | Q Have you ever spoken to <u>                    </u> about            | 17:06:10 |
| 9  | the abuse of her children?                                             | 17:06:14 |
| 10 | A Yes.                                                                 | 17:06:21 |
| 11 | Q Tell me about that.                                                  | 17:06:22 |
| 12 | A I told her about what happened, but I don't                          | 17:06:32 |
| 13 | remember exactly what I told her.                                      | 17:06:35 |
| 14 | Q Where was this conversation?                                         | 17:06:41 |
| 15 | A In her house.                                                        | 17:06:46 |
| 16 | Q Was your mother there?                                               | 17:06:49 |
| 17 | A My mother?                                                           | 17:06:58 |
| 18 | Q Your mother.                                                         | 17:06:59 |
| 19 | A No.                                                                  | 17:07:00 |
| 20 | Q Did she ask you to come to her house?                                | 17:07:03 |
| 21 | A No.                                                                  | 17:07:08 |
| 22 | Q Did you go to her house voluntarily?                                 | 17:07:09 |
| 23 | A As far as I can remember, yes.                                       | 17:07:16 |
| 24 | Q When was this?                                                       | 17:07:18 |
| 25 | A I don't remember when it was.                                        | 17:07:26 |

|    |   |                                                   |          |
|----|---|---------------------------------------------------|----------|
| 1  | Q | Had you been disfellowshipped?                    | 17:07:31 |
| 2  | A | I think I had. I don't remember.                  | 17:07:40 |
| 3  | Q | What did Felimina say to you?                     | 17:07:43 |
| 4  | A | She was very bothered.                            | 17:07:49 |
| 5  | Q | Did she accuse you of molesting John Rivera?      | 17:07:54 |
| 6  | A | Yes.                                              | 17:08:06 |
| 7  | Q | And what did you say?                             | 17:08:07 |
| 8  | A | I asked her for her forgiveness.                  | 17:08:12 |
| 9  | Q | Did she give it to you?                           | 17:08:17 |
| 10 | A | No. I don't remember what she said very well,     | 17:08:31 |
| 11 |   | but she was very mad.                             | 17:08:35 |
| 12 | Q | Did she accuse you of molesting Joshua?           | 17:08:40 |
| 13 | A | I don't remember.                                 | 17:08:48 |
| 14 | Q | Was Roberto there?                                | 17:08:52 |
| 15 | A | I don't remember.                                 | 17:08:57 |
| 16 | Q | Were the children there? The three Rivera         | 17:09:00 |
| 17 |   | children?                                         | 17:09:05 |
| 18 | A | I think so. I'm not sure.                         | 17:09:08 |
| 19 | Q | Did you ever talk to Roberto Rivera about what    | 17:09:10 |
| 20 |   | happened to his kids?                             | 17:09:13 |
| 21 | A | I don't remember.                                 | 17:09:21 |
| 22 | Q | <u>How did you meet John Dorman?</u>              | 17:09:58 |
| 23 | A | <u>We met at a meeting that took place at the</u> | 17:10:12 |
| 24 |   | <u>congregation that they attended.</u>           | 17:10:19 |
| 25 | Q | Did you ever take John to work with you?          | 17:10:23 |

|    |   |                                                      |          |
|----|---|------------------------------------------------------|----------|
| 1  | A | Yes.                                                 | 17:10:29 |
| 2  | Q | What was your work?                                  | 17:10:30 |
| 3  | A | I was a gardener.                                    | 17:10:35 |
| 4  | Q | Did you work in one place in particular? Or          | 17:10:39 |
| 5  |   | did you work at a number of locations?               | 17:10:42 |
| 6  | A | In various different places.                         | 17:10:49 |
| 7  | Q | How many times did you take John with you to         | 17:10:53 |
| 8  |   | work?                                                | 17:10:55 |
| 9  | A | I don't know. I don't remember how many              | 17:11:04 |
| 10 |   | times.                                               | 17:11:06 |
| 11 | Q | Was it 50?                                           | 17:11:09 |
| 12 | A | No.                                                  | 17:11:13 |
| 13 | Q | Less?                                                | 17:11:13 |
| 14 | A | Yes.                                                 | 17:11:14 |
| 15 | Q | Was it 20?                                           | 17:11:15 |
| 16 | A | Less.                                                | 17:11:20 |
| 17 | Q | 10?                                                  | 17:11:21 |
| 18 | A | Less.                                                | 17:11:24 |
| 19 | Q | Five?                                                | 17:11:25 |
| 20 | A | Possibly. I don't remember.                          | 17:11:30 |
| 21 | Q | <u>Did you ever touch John inappropriately on</u>    | 17:11:32 |
| 22 |   | <u>those occasions, that you took him to work?</u>   | 17:11:35 |
| 23 | A | <u>Yes.</u>                                          | 17:11:44 |
| 24 | Q | <u>What happened?</u>                                | 17:11:46 |
| 25 | A | <u>I touched his private parts and I abused him.</u> | 17:11:52 |



|    |   |                                                  |          |
|----|---|--------------------------------------------------|----------|
| 1  | Q | Did you expose your penis to him?                | 17:12:07 |
| 2  | A | Yes.                                             | 17:12:12 |
| 3  | Q | Did you touch him with your penis?               | 17:12:14 |
| 4  | A | Yes.                                             | 17:12:18 |
| 5  | Q | Did you put your penis in his mouth?             | 17:12:19 |
| 6  | A | No.                                              | 17:12:24 |
| 7  | Q | Did you penetrate his anus?                      | 17:12:26 |
| 8  | A | I don't remember.                                | 17:12:33 |
| 9  | Q | Did you ask John to touch your penis?            | 17:12:37 |
| 10 | A | I don't remember.                                | 17:12:43 |
| 11 | Q | On how many occasions, did you touch John        | 17:12:48 |
| 12 |   | Dorman inappropriately?                          | 17:12:51 |
| 13 | A | I don't remember if it was three or four times.  | 17:13:04 |
| 14 |   | I don't remember.                                | 17:13:08 |
| 15 | Q | Where did it happen?                             | 17:13:09 |
| 16 | A | While we were on the way to work or at work.     | 17:13:17 |
| 17 | Q | Did you ever take him back to your home?         | 17:13:27 |
| 18 | A | Yes. I remember that one time, I took him to a   | 17:13:39 |
| 19 |   | house where my mother worked.                    | 17:13:44 |
| 20 | Q | Was there a pool at that house?                  | 17:13:47 |
| 21 | A | Yes.                                             | 17:13:49 |
| 22 | Q | What happened?                                   | 17:13:51 |
| 23 | A | After having bathed in the pool, we went to go   | 17:14:05 |
| 24 |   | take a shower and I touched him inappropriately. | 17:14:09 |
| 25 | Q | Did you also touch him inappropriately in the    | 17:14:13 |

## **EXHIBIT 6**

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12 Attorney for Plaintiff

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SAN DIEGO

10 John Dorman, Individually, and Joel  
11 Gamboa, Individually,

12 Plaintiffs,

13 v.

14 Defendant Doe 1, La Jolla Church,  
15 Defendant Doe 2, Linda Vista church, and  
16 Defendant Doe 3, Supervisory  
17 Organization, Defendant Doe 4,  
18 Perpetrator, and Does 5 through 100,  
19 inclusive,

20 Defendants.

) Case No: 37-2010-00092450-CU-PO-  
CTL

) **DECLARATION OF MANUELA  
DORMAN IN SUPPORT OF  
PLAINTIFFS OPPOSITION TO  
DEFENDANTS' MOTIONS FOR  
SUMMARY JUDGMENT**

) Date: 12-16-11  
) Time: 10:30 a.m.  
) Dept C-73  
) Judge: Steven R. Denton  
) Trial: 1-27-12

21 I, Manuela Dorman, based upon my personal knowledge do hereby declare:

22 I was born on May 9, 1958. I was born in Mexico and moved to the United States in  
23 1976 and the age of eighteen and married John Dorman II. John and I lived together in the  
24 San Diego area for eleven years, and each of our three children was born in San Diego.

25 I began studying the Bible on October 12, 1981. Originally, I began studying with  
26 Reina Cervantes. Later I studied with Brother Quijada and his wife. Brother Quijada was an  
27 Elder in the Linda Vista Spanish Congregation at the time.

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DECLARATION OF MANUELA DORMAN IN SUPPORT OF PLAINTIFFS  
OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

1 After I began studying the Bible with Reina Cervantes, I began attending meetings at  
2 the Linda Vista Spanish Congregation. After several months, possibly up to one year, I  
3 became a publisher. To become a publisher I met with, and was approved by, two Elders.  
4 One was Brother Quijada, who had been studying the Bible with me. I do not recall who the  
5 other Elder was.

6 I was Baptized one of Jehovah's Witnesses at a Circuit Assembly in Escondido,  
7 California, in April of 1984. My former husband, John Victor Dorman II never became  
8 Jehovah's Witness, but my children attended meetings and participated in Field Service with  
9 me.  
10

11 In approximately 1982, I moved to La Jolla, California, with my family. I continued  
12 to attend meetings at Linda Vista Spanish Congregation with my children, and I continued to  
13 study the Bible.

14 During approximately 1982, I met Gonzalo Campos. Gonzalo Campos was a  
15 Baptized male, and a respected member of the Linda Vista Spanish Congregation. Gonzalo  
16 frequently volunteered to pass the microphones at meetings, and was sometimes selected to  
17 give five minute talks at the theocratic ministry school. During the time when I was living in  
18 La Jolla, and attending meetings at the Linda Vista Spanish Congregation, I did not own a  
19 car. In order to attend meetings or participate in Field Service, I took the bus with my two  
20 small children. Gonzalo recognized this, and sometimes offered to give John, Paloma and  
21 me a ride to congregation events.  
22  
23

24 Many of the women in the congregation spoke about Gonzalo with respect. They  
25 mentioned that Gonzalo was a Pioneer and that he spent many hours in service. Gonzalo was  
26 very involved with the Linda Vista Congregation from the time I began attending meetings at  
27 the Congregation until my family moved away from California. Based upon what I was told  
28 by members of the congregation, the number of hours that Gonzalo spent in Field Service  
29

1 and other congregation activities, and the deference he received from congregation members,  
2 I knew he was a Pioneer in the Linda Vista Congregation, which means that he committed to  
3 spend a certain amount of hours in service in a particular month. In fact, it was widely  
4 known at that time that Gonzalo Campos held this position in the Linda Vista Spanish  
5 Congregation.

6  
7 Since the time I became a publisher, Field Service has been an important part of the  
8 Jehovah's Witness faith. Field Service involves members of a local congregation preaching  
9 door to door in the community. Between 1982 and 1986 in the Linda Vista Spanish  
10 Congregation, Field Service began with a meeting at the home of a member of the  
11 congregation. I generally met several other members of the Linda Vista Congregation at the  
12 home of Hugo and Maria Elena Arrue. I believe Hugo Arrue was an Elder in the Linda Vista  
13 Spanish Congregation at the time.

14  
15 The meeting for Field Service would begin with a consideration of the daily text, and  
16 the accompanying Watchtower comment. Then, there would be a discussion about how to  
17 present the material in Field Service that day, how to approach people in the neighborhood,  
18 and of the literature we would be offering. Brother Arrue would usually conduct this  
19 meeting. At the conclusion of the meeting for Field Service, the individual leading the  
20 meeting would assign groups to drive together to the territory where the group would be  
21 preaching that day. During the early 1980s at the Linda Vista Spanish Congregation, John,  
22 Paloma and I were often assigned to drive with Gonzalo Campos in Field Service. Paloma  
23 was very young at the time and did not participate in Field Service, but did accompany John  
24 and me.

25  
26 Often, Gonzalo would be the only adult male in our Field Service group. Gonzalo  
27 would take the lead and direct the women and children in Field Service in the territory where  
we were preaching. Sometimes my son John would go to the door with Gonzalo.

1 On Saturday Mornings at the Linda Vista Spanish Congregation between 1982 and  
2 1986, it was customary to participate in Field Service in the morning, until noon. Then, there  
3 would be a social gathering at the home of one of the members of the congregation. Gonzalo  
4 often gave John, Paloma and I a ride to the social gathering after Field Service.

5 It is common within the Jehovah's Witness faith for children to be given weekly  
6 Bible Study sessions by their fathers. In the early 1980s, my husband was not Jehovah's  
7 Witness and therefore could not give John the customary Bible Study instruction. In such  
8 circumstances, it is appropriate to ask a Baptized Brother from the congregation to fill in and  
9 teach Bible Study sessions to your children.

10 Because Gonzalo was a Baptized Brother, and a Pioneer, I believed that I could trust  
11 him with my son, John. So I asked Gonzalo to give John Bible Study sessions, and Gonzalo  
12 agreed. These sessions took place once every week and usually occurred during the work  
13 week. Sometimes, Gonzalo would be too busy to meet with John during the week, so he  
14 would instruct John during the social gathering on Saturdays. These Bible Study sessions  
15 began when John was approximately five years old. Gonzalo had good standing within the  
16 congregation and appeared to be a good example, so I thought he would be a good choice to  
17 give Bible Study to John.

18 After Gonzalo had already begun to provide Bible Study instruction to John, Gonzalo  
19 asked me if he could take John with him to his job doing yard work. I thought this would be  
20 a good opportunity for John to learn how to do yard work, and would teach John  
21 responsibility. I thought Gonzalo was a good example for John. I also knew that other  
22 members of the congregation allowed their children to accompany Gonzalo to work, so I  
23 agreed. On several occasions, Gonzalo picked John up from our home and took John with  
24 him to work.  
25  
26  
27

1 While I was living in La Jolla, I attended the Linda Vista Spanish Congregation until  
2 a group was formed in La Jolla. I then began to attend meetings with the group in La Jolla,  
3 until in the mid 1980s, I moved with my family from La Jolla to Linda Vista. After I moved  
4 to Linda Vista, I began attending the Linda Vista Spanish Congregation again. In 1987, I  
5 moved to Illinois with my family.

6 As a child, beginning approximately when John was in kindergarten, John became  
7 very disrespectful and rebellious. In March of 1993, his bad behavior escalated to the point  
8 where I had to take him out of school. After pulling him out of school, I sent him to live  
9 with his grandmother, Adeilada Carrillo, in Mexico. John lived with his grandmother for  
10 three months, and then came home to live with our family. By the time John returned from  
11 Mexico, our family had moved to Oregon. When he returned from Mexico, John was still  
12 very poorly behaved and would direct much of his anger toward me. John enrolled in school  
13 in Oregon, but it did not work out, so John went to Job Corps.

14 When John returned from Job Corps in April of 1994, I found a letter among his  
15 belongings. The letter was addressed to a girlfriend and mentioned that something had  
16 happened to him when he was six years old. My husband and I did not know what he could  
17 be talking about, so we asked John.

18 John then informed us that, when we were living in La Jolla, he had been sexually  
19 abused by Gonzalo Campos on multiple occasions when Gonzalo had taken John with him to  
20 work. John told us that Gonzalo had also sexually abused another boy, Johnny Rivera.

21 On the night that I learned about John's abuse, I called Anita Martinez, Gonzalo  
22 Campos' mother. I told her I needed to talk to Gonzalo, and Anita told me he was asleep. I  
23 told her she needed to wake Gonzalo up and put him on the phone. She did. I asked  
24 Gonzalo if he knew why I was calling, and he said no. I then told him that I had learned  
25 what he did to my son ten years earlier. Gonzalo admitted to sexually abusing John.

1 Gonzalo told me that the Elders had been made aware of his sexual abuse several years ago,  
2 before he became a Ministerial Servant, and that they had found Gonzalo to be repentant. He  
3 did not specifically say that he was reproved regarding the abuse of John, and I understood  
4 him to say that he had been reproved for sexually molesting a different boy. I did not believe  
5 as a result of that conversation that the Elders were aware of the sexual abuse of John.  
6 Gonzalo told me that he became a ministerial servant six months after he was reproved.

7  
8 I was disgusted to hear that he had become a Ministerial Servant so soon after being  
9 reproved for sexually abusing children. I had actually sent him a congratulations card when I  
10 learned that he had been selected as a Ministerial Servant, because I had no idea what he had  
11 done.

12 I also called Roberto Rivera, Johnny Rivera's father. I told him about my son's abuse  
13 and that John had told me that Brother Rivera's son, Johnny, had also been abused. Roberto  
14 told me he would call me back after he had spoken to his son, Johnny, and the church Elders.  
15 Roberto called me back and told me that the Elders said I should not take any further action,  
16 or call anyone else in the congregation about what had happened, or an affair that I had when  
17 I was attending the Linda Vista Congregation would be made public in the congregation. I  
18 told Roberto that I did not care, and that I would continue to push the issue. Roberto also  
19 told me that the Elders told him to me too much time had passed and nothing could be due  
20 because of the years that had passed.

21  
22 I spoke with my husband, and I understood that when Roberto said nothing could be  
23 done because too much time had passed, that he was talking about the statute of limitations.

24  
25 ///

26  
27 ///

28  
29 ///



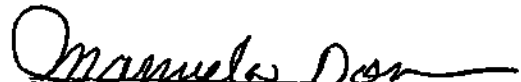
1 After I had been threatened by Roberto, I called Brother Ken Nissen from the Monmouth,  
2 Oregon English Congregation and he came to my house. I told him what had happened to my  
3 son, and what Gonzalo and Roberto had told me. Brother Nissen told me I could write to the  
4 Society.

5 After that conversation, I wrote a letter to the Monmouth, Oregon English Congregation  
6 of Jehovah's Witnesses informing the Elders of the molestation of my son by Gonzalo Campos.  
7 I knew when I wrote it, that the letter would be forwarded to the Society in New York. I also  
8 spoke to many members of the Linda Vista Congregation about Gonzalo's sexual abuse of my  
9 son. I tried to learn what other boys had spent time with Gonzalo so that I could contact their  
10 parents and warn them. I learned that my friend Hugolina Cervantes' son, Joel, had spent time  
11 alone with Gonzalo. I spoke to Hugolina about my suspicions about Gonzalo and her son. I also  
12 informed the Elders of the Playa Pacifica congregation that Joel may have been abused.  
13

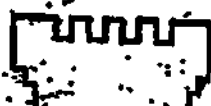
14 I was contacted by Brother Jesus Martinez, an Elder in the Playa Pacifica Congregation,  
15 where Gonzalo was also serving as an Elder in the mid 1990s. Brother Martinez and two other  
16 Elders interviewed John and me over the phone. Brother Martinez assured me that the Elders  
17 would handle the situation through the Judicial Committee process.  
18

19 I declare under the penalty of perjury, under the laws of the State of California, that the  
20 foregoing is true and correct to the best of my knowledge and belief.

21 Executed this 29 day of November, 2011, at Monmouth, Oregon.  
22

23   
24 Manuela Dorman  
25  
26  
27  
28

## **EXHIBIT 7**



KINGDOM HALL OF JEHOVAH'S WITNESSES  
 PLAYA PACIFICA SPANISH CONGREGATION  
 4543 MORRIS STREET  
 SAN DIEGO, CA 92105 619-275-8493

CMD APR 14 1995

SSU APR 21 1995

29 de marzo de 1995

Estimados Hermanos:

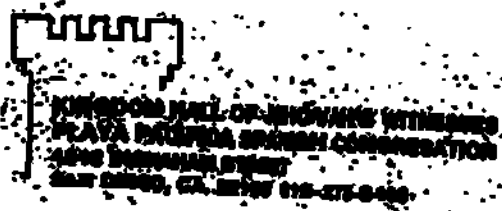
En respuesta a su carta del 3 de junio de 1994, SDIASSU enviada al cuerpo de ancianos de la Congregación Playa Pacifica, se ha hecho una investigación del asunto a para el 15 de marzo de 1995. El cuerpo de ancianos de la Congregación Playa Pacifica, en vista de que han pasado varios años de tiempo, no se acuerda de que (¿quién?) fue el que se le dio el nombre de "Congregación Playa Pacifica" en el año 1960. El cuerpo de ancianos de la Congregación Playa Pacifica, en vista de que han pasado varios años de tiempo, no se acuerda de que (¿quién?) fue el que se le dio el nombre de "Congregación Playa Pacifica" en el año 1960. El cuerpo de ancianos de la Congregación Playa Pacifica, en vista de que han pasado varios años de tiempo, no se acuerda de que (¿quién?) fue el que se le dio el nombre de "Congregación Playa Pacifica" en el año 1960.

Sus Hermanos  
 Comité de Servicio  
 Congregación Playa Pacifica

Luis Rivera, P.O.

Florentino Garcia, S.S.

Gonzalo Campos, SGA



SSD APR 21 1995

March 29, 1995

Dear Brothers:

In reply to your letter of June 9, 1994 SDI:SSU sent to the body of elders of the Playa Pacifica Congregation, an investigation has been done regarding the matter and for that, the records of the Linda Vista Congregation, where the event happened, have been reviewed. But in view that many years have passed, nothing was found that could provide us an exact date of the events in the file. But we spoke with Brother Justino Diaz who served as an elder in said congregation even though he was not part of the judicial committee.

Effectively, Brother Gonzalo Campos was culpable of the errors he is being accused of. However, when the elders approached him, Brother Campos showed repentance. And due to that, was privately censured by the judicial committee, restricting some privileges of service.

Now well, this occurred around the months of September / October of 1986. He was reinstated some 9 months later. As you can see, by the time Brother Campos was appointed a Ministerial Servant (September 22, '88) some time had already passed since his reinstatement. Subsequently, he was appointed an elder on June 23, 1993.

As we mentioned before, no record exists that give testimony regarding such censure. However, we spoke to Brother Justino Diaz who served as an elder and still serves as an elder in the Linda Vista Congregation and even though he did not serve on the committee, he did know about the events, adding the testimony of Brother Luis Rivera who served as a member of the judicial committee that censured Brother Campos. We think that the accusations that have been made regarding the time of the censure lack a valid foundation. We hope this letter answers your questions regarding the matter in question. We pray the Jehovah continue to bless you.

Your brothers,  
Service Committee  
Playa Pacifica Congregation

{Signature}  
Luis Rivera, P.O.

{Signature}  
Florentino Gracia, S.S.

{Signature}  
Gonzalo Campos, Sec.

## **EXHIBIT 8**



ORIGINAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO

JOHN DORMAN,  
individually, and JOEL  
GAMBOA, individually,

Plaintiffs,

vs.

DEFENDANT DOE 1, LaJOLLA  
CHURCH; DEFENDANT DOE 2,  
LINDA VISTA CHURCH;  
DEFENDANT DOE 3,  
SUPERVISORY ORGANIZATION;  
DEFENDANT DOE 4,  
PERPETRATOR; and DOES 5  
through 100,

Defendants.

Case Number

37-2010-00092450-CU-PO-CTL

DEPOSITION OF [REDACTED], called on  
behalf of the Plaintiffs, at 12555 High Bluff  
Drive, Suite 260, San Diego, California, on  
Monday, February 7, 2011, commencing at 1:01  
p.m., before Judy Runes, California CSR No.  
5874.

1 A Yeah, there was an incident, yes.

2 Q Okay. And when did that incident take place?

3 A I'm approximating here. It was sometime when  
4 I was in junior high school. So anywhere between 13  
5 years old, maybe 15.

6 Q So sometime between 1982 and 1984?

7 A Something like that.

8 Q Did Gonzalo ever take you to work with him?

9 A No.

10 Q When this incident took place, did you tell  
11 anyone?

12 A Yes.

13 Q Okay. Who did you tell?

14 A My mother, and at least an elder.

15 Q Okay. And did you tell them at the time of  
16 the incident?

17 A I told my mom at the time, yes, I did. And  
18 the elder was after.

19 Q And this was an elder from the Linda Vista  
20 congregation?

21 A That's correct.

22 Q Do you remember the elder's name?

23 A No, I don't.

24 Q Do you remember how much later this discussion  
25 with the elder was after you told your mother?

1           A     Approximately one day maybe, or two. It was  
2 pretty soon after.

3           Q     What happened next, after you told the elder?

4           A     With myself?

5           Q     Well, I guess I'll come back and rephrase.  
6 Was a judicial committee formed?

7           A     I don't know. I wasn't an elder at the time.

8           Q     To your knowledge, did the congregation  
9 investigate the incident?

10          A     You mean the elders?

11          Q     Yes.

12          A     I don't know. I wasn't an elder at the time.

13          Q     You weren't interviewed?

14          A     After that? I wasn't, not that I remember. I  
15 had a few discussions about it, but not that I remember.  
16 I don't remember -- I can't remember if I was  
17 interviewed like that or not.

18          Q     Okay. So who were these discussions with?

19          A     An elder, talking to me.

20          Q     Okay.

21          A     I just don't remember which one, either.

22          Q     After this -- after this first time that you  
23 told an elder, which was roughly a day after you told  
24 your mother, there was another occasion where you spoke  
25 to an elder?



1       A     Yes.

2       Q     Okay. How much later was that?

3       A     I don't remember.

4       Q     Days? Months? Years?

5       A     I don't remember. Maybe a few -- maybe a  
6 month or so. I really don't remember.

7       Q     Okay. And do you know who that elder was?

8       A     No.

9       Q     Was it the same elder?

10      A     I don't remember.

11      Q     During those conversations, did you tell the  
12 elders specifically what Gonzalo had done?

13      A     I didn't discuss that again, after the first  
14 time.

15      Q     After the first time?

16      A     Right.

17      Q     Okay. So the first time you spoke to an  
18 elder, did you tell him that Gonzalo had done something  
19 sexually inappropriate?

20      A     Yes, he did.

21      Q     And that's what you told the elder?

22      A     Yes.

23      Q     And you've given a time frame as somewhere  
24 between 1982 and 1984, and roughly when you were 12 to  
25 15.

1       A     Roughly.

2       Q     Okay. I'm sorry, I know this is an  
3 uncomfortable thing to talk about, and I don't want to  
4 press particularly hard here. I'm just trying to narrow  
5 down a date, if you can.

6               Was there anything going on at the time of  
7 this occurrence that will help you pin it to a period in  
8 time? For instance, you knew who your teacher was when  
9 this took place.

10       A     That's how I came up with junior high. That's  
11 the best I can do. Sometime during junior high. I just  
12 don't remember all the --

13       Q     Okay. After this second meeting with the  
14 elder, did anyone with the Linda Vista congregation ever  
15 contact you again about this?

16       A     No.

17       Q     Okay. So if I understand the time frame  
18 correctly, sometime between 1982 and 1984 something  
19 inappropriate happened. You reported it to your mother.

20               Was that the same day that it occurred?

21       A     Same moment, yeah, same time.

22       Q     Okay.

23       A     I lived at home.

24       Q     Okay. And this took place at home?

25       A     Yeah.

1 Q Okay. Why was Gonzalo at your home?

2 A I don't know. My mom allowed him to live at  
3 the house. I really don't know. Trying to help him,  
4 probably.

5 Q Okay. So the day after you told your  
6 mother -- approximately the day after you told your  
7 mother, you told an elder --

8 A Yeah.

9 Q -- with the Linda Vista Spanish congregation.  
10 And sometime later -- maybe a month, maybe  
11 more, maybe less, just ball-parking -- you spoke to  
12 another elder?

13 A Yeah.

14 Q Okay. And you were clear with the first elder  
15 that the problem was something of a sexual nature that  
16 Gonzalo had done?

17 A Yeah. Correct.

18 Q Okay. After making those reports, did you  
19 ever talk to anyone else about it?

20 A No.

21 Q Is there any way you can think of that we can  
22 narrow down the time frame of when this took place?

23 A I've tried.

24 Q You have?

25 A Yeah.

1 Q Okay. You didn't move or anything like that  
2 during that time period?

3 A No.

4 Q Okay.

5 MR. STOREY: Jim, can we go off the record for  
6 just a second?

7 MR. McCABE: Sure.

8 (Off the record from 1:17 to 1:20.)

9 BY MR. STOREY:

10 Q On that occasion that Gonzalo did something  
11 that you thought was inappropriate, what happened?

12 A I think he was trying to rape me.

13 Q What time of day was this?

14 A At night. I was asleep.

15 Q You were asleep.

16 And where were you sleeping?

17 A In my bed.

18 Q Did Gonzalo have a separate room?

19 A No.

20 Q He stayed in your room?

21 A Yep.

22 Q Okay. And at some point, were you awakened?

23 A Yes.

24 Q What woke you up?

25 A I felt him pulling my pants down, my pants --

1 my pajama pants down.

2 Q Okay. And where was he physically? Was he in  
3 bed with you?

4 A No, he was next to the bed.

5 Q Okay. So he was next to the bed.  
6 Were you under your covers?

7 A Kind of, yeah, sort of. I had covers. I  
8 don't know if they were on me at that point.

9 Q Okay. And what happened next?

10 A What happened? I was sleeping. I felt him --  
11 I felt something bothering me, my pants, which got me  
12 kind of aware of what was going on. And then I still  
13 continued to sleep. And I felt, like, saliva, I guess,  
14 or wetness, like, on my -- on my behind. And then I  
15 woke up and I saw him kneeling next to the bed, right  
16 next to me at that point. So I put one and one together  
17 pretty quick and I realized what he was doing and I  
18 started yelling and screaming.

19 Q Okay. And how did he react? Did he run?

20 A Well, he tried to, yeah. I actually -- I kind  
21 of lost it a little bit, so I -- I -- I hit him a  
22 little. And he just stayed there in the room. And  
23 I -- I left to my mom's room and told her what's going  
24 on. My mom went in there to go talk to him.

25 Q So by the time that you woke up, then, and

1 kind of figured out what was going on, your pants were  
2 down?

3 A When I woke up, my pants were down. Yeah, my  
4 pajama pants were down.

5 Q And you said that you felt something like  
6 saliva on your buttocks?

7 A Yeah.

8 Q Was his face down against your buttocks?

9 A No, it wasn't. When I woke up, I turned  
10 around, he was looking at me.

11 Q Okay. Where were his hands when you woke up?

12 A I don't know. They weren't on me, for sure.

13 Q Okay. And do you remember anything else about  
14 that incident?

15 A No. It happened very quickly. That's all I  
16 know. It happened real quick.

17 And I think I remember more of the aftermath  
18 than the actual event because all the, you know, drama  
19 that happened afterwards.

20 Q Okay. You said that you hit him afterward?

21 A Yeah.

22 Q With your fists?

23 A I hit him with my fists and I -- we used to  
24 keep a bat at the house, underneath the bed. I hit him  
25 with that too.

## **EXHIBIT 9**

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 IN AND FOR THE COUNTY OF SAN DIEGO

3  
4 JOHN DORMAN, INDIVIDUALLY, AND )  
5 JOEL GAMBOA, INDIVIDUALLY, )

6 Plaintiffs, )

7 vs. )

8 DEFENDANT DOE 1, La Jolla Church; )  
9 DEFENDANT DOE 2, Linda Vista )  
Church; DEFENDANT DOE 3, )  
Supervisory Organization; )  
10 DEFENDANT DOE 4, Perpetrator; and )  
DOES 5 through 100, )

11 Defendants. )  
12

CERTIFIED COPY

No. 37-2010-00092450  
CU-PO-CTL

13  
14  
15  
16 DEPOSITION OF MARINA AYLLON

17 San Diego, California

18 October 19th, 2011

19  
20  
21 ATKINSON-BAKER, INC.

22 COURT REPORTERS

(800) 288-3376

23 www.depo.com

REPORTED BY: Leesah Teran, CSR NO. 12675

24 FILE NO.: A509B82  
25



1 Q. Okay.

2 How long did Gonzalo stay in your home?

3 A. I believe it was one month or weeks, I don't  
4 remember.

5 Q. Okay.

6 Why did he stop staying with you?

7 A. Because he tried to violate my son.

8 Q. Okay.

9 Were you in the home at the time that that  
10 occurred?

11 A. Yes.

12 Q. And was it at nighttime?

13 A. Yes.

14 Q. Were you asleep?

15 A. Yeah.

16 Q. Did your son and Gonzalo share a room during  
17 that period of time?

18 A. Yes.

19 Q. Okay.

20 And what happened?

21 MR. COPLEY: Objection. Lacks foundation.  
22 Calls for speculation.

23 BY MR. STOREY:

24 Q. You can answer.

25 A. Repeat the word again.

1 Q. What happened?

2 MR. COPLEY: Same objection.

3 THE WITNESS: That night when that happened my  
4 son was screaming and when I got up I saw him that he  
5 was about to hit him.

6 BY MR. STOREY:

7 Q. Your son was going to hit Gonzalo?

8 A. Yes.

9 Q. Was he going to hit him with his hand?

10 A. No, he had a bat.

11 Q. A baseball bat?

12 A. Yeah.

13 Q. Okay.

14 And what did you do when you saw that?

15 A. I took him to my bedroom.

16 Q. You took who to your bedroom?

17 A. My son.

18 Q. Okay.

19 And did you go talk to Gonzalo after that?

20 A. Yes, I went out because he ran to the garage.

21 Q. So did you talk to Gonzalo in the garage?

22 A. I couldn't. I did not talk to him because he  
23 asked for forgiveness, that is all.

24 Q. Okay.

25 Did you ask him to leave?

1 A. Yes, he left the next day.

2 Q. Okay.

3 Did you tell anyone at the Linda Vista  
4 Congregation about what happened?

5 A. Yes, I went to my elders.

6 Q. Do you know which elder you spoke to?

7 A. Montejo and Carlos Ramirez.

8 Q. Jesus Montejo?

9 A. Yes.

10 Q. What did you tell them?

11 A. That he tried to abuse my son.

12 Q. Are those the words you used?

13 A. Yes.

14 Q. That Gonzalo tried to abuse your son?

15 A. Yes.

16 Q. Was it clear that it was an intended sexual  
17 touching?

18 MR. COPLEY: Objection. Lacks foundation.  
19 Speculation.

20 THE WITNESS: Repeat that word again.

21 BY MR. STOREY:

22 Q. Okay. I will rephrase.

23 Before you went to the elders, did you talk to  
24 your son about what happened?

25 A. Yes.

1 Q. What did your son tell you?

2 A. He told me that he had tried to abuse him.

3 Q. Sexually?

4 A. Yeah.

5 Q. Okay.

6 And when you spoke with Jesus Montejo and  
7 Carlos Ramirez, is that what you told them?

8 A. Yeah, I told them that.

9 Q. That Gonzalo tried to abuse your son sexually?

10 A. Yes.

11 Q. Did you tell them that Gonzalo had begged for  
12 your forgiveness?

13 A. I don't remember.

14 Q. Okay.

15 Where was this meeting with Jesus Montejo and  
16 Carlos Ramirez?

17 A. In their home.

18 Q. Your home?

19 A. Jesus Montejo's home.

20 Q. Did you call Jesus in advance and tell them  
21 that you needed to talk to him?

22 A. Yes.

23 Q. What did you tell Jesus on the phone?

24 A. No. Just that I needed to talk to him.

25 Nothing more.

1 Q. Okay.

2 And then when you showed up at Jesus' home,  
3 did you expect Carlos Ramirez to be there?

4 A. Yeah, because he told me that he would call  
5 another elder.

6 Q. Okay.

7 And after you told them that Gonzalo had tried  
8 to touch your son sexually, what did they say?

9 A. They didn't talk to me.

10 Q. Okay.

11 Did they just listen to you?

12 A. Yes. Yes.

13 Q. Did they ask you any questions?

14 A. They told me that they would take care of the  
15 matter.

16 Q. Okay.

17 After that meeting, did you ever speak to  
18 another person with the Linda Vista Congregation?

19 A. No.

20 Q. Did you ever speak to Gonzalo's mother about  
21 the incident?

22 A. I don't remember.

23 Q. Did you ever speak with Justino Diaz about the  
24 incident between Gonzalez and your son?

25 A. No.

## **EXHIBIT 10**



**ORIGINAL**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO**

**John Dorman, Individually,  
and Joel Gamboa,  
Individually,**

**Plaintiffs,**

**vs.**

**CASE NO. 37-2010-00092450-  
CU-PO-CTL**

**Defendant Doe 1, La Jolla  
Church; Defendant Doe 2,  
Linda Vista Church;  
Defendant Doe 3, Supervisory  
Organization; Defendant  
Doe 4, Perpetrator; and  
Does 5 through 100,**

**Defendants.**

~~~~~

DEPOSITION OF

JESUS MONTIJO

February 9, 2011

10:08 a.m.

**12555 High Bluff Drive
Suite 260
San Diego, California**

www.DEPO911.com

toll free (877) DEPO 9-1-1

1 Q. What kind of matters required a judicial
2 committee?

3 A. Immorality, drunkenness. Those matters.

4 Q. How many judicial committees were you on with
5 Linda Vista?

6 A. I don't remember.

7 Q. Were they common?

8 A. No.

9 Q. So it was rare for there to be a judicial
10 matter?

11 A. Yes, they're not frequent.

12 Q. Once a judicial committee is formed, what does
13 a judicial committee do?

14 A. Well, they speak with those involved. But
15 before forming it, you look to see if there's a basis to
16 form the committee.

17 Q. Who looks to see if there's a basis?

18 A. Two elders.

19 Q. How are those elders chosen?

20 A. They're just selected to take care of the
21 matter.

22 Q. Is there an elder that's responsible for
23 overseeing the judicial committee?

24 A. No. The body of elders is informed as to what
25 happens in the committee.

1 Q. Before the committee is formed, when the two
2 elders are investigating, do they take testimony of
3 witnesses?

4 A. If there are any, yes.

5 (Mr. Moreno enters the deposition room)

6 BY MR. STOREY:

7 Q. In what circumstances will that group of two
8 elders form a judicial committee?

9 A. When there are witness about the matter that's
10 at hand that was learned about or if there's a
11 confession of the individual person, the accused.

12 Q. So if there is no confession, can a judicial
13 committee be formed?

14 A. If there's no witnesses and there's no
15 confession, no.

16 Q. If there's no confession but there are
17 witnesses, can a judicial committee be formed?

18 A. If there are two or three witnesses, yes.

19 Q. If there's one accuser and no other witnesses
20 and no confession, can a judicial committee be formed?

21 A. No.

22 Q. At the end of the judicial committee, is there
23 a written report?

24 A. If there's a judicial committee?

25 Q. Yes.

1 A. Yes.

2 Q. Would the original two elders make a written
3 report?

4 A. There have to be three elders for a committee,
5 or four.

6 Q. Correct. But prior to the creation of the
7 judicial committee, is there an investigation by two
8 elders?

9 A. Two, yes.

10 Q. Would that group of two make a written
11 recommendation about their findings?

12 A. No.

13 Q. How would they tell the elders that a judicial
14 committee was warranted?

15 A. In a meeting.

16 Q. At the end of the judicial committee, what kind
17 of facts would be in the written report?

18 A. If there is a judicial committee, right?

19 Q. Yes.

20 A. About what the perpetrator did, the reason why
21 he was expelled. That's it. Yes.

22 Q. What are the possible outcomes of a judicial
23 committee?

24 A. I don't understand your question.

25 Q. Can a person be "expulsado"?

1 A. If his culpability is proven by two or three
2 witnesses, yes, or by a confession.

3 Q. Can a person be reproved?

4 A. Reproved?

5 MR. STOREY: Could we go off the record for
6 one second?

7 (Discussion held off the record)

8 BY MR. STOREY:

9 Q. Can a judicial committee find a person to be
10 guilty, but not disfellowshipped?

11 THE INTERPRETER: But not...?

12 MR. STOREY: "Expulsado."

13 THE WITNESS: If he repents and shows the
14 repentant deeds.

15 BY MR. STOREY:

16 Q. If a person is repentant, will the judicial
17 committee still place some restrictions on that person?

18 A. Yes.

19 Q. Who gets a copy of the written report from the
20 judicial committee?

21 A. Who?

22 Q. Yes.

23 A. Gets one?

24 Q. Yes.

25 A. If the person is expelled, there's a

1 A. Yes, and if there are witnesses.

2 Q. Did you ever hear that Gonzalo Campos had
3 sexually abused a child?

4 A. Not abused. Through the mother of the young
5 man. That's all.

6 Q. What did you hear?

7 MR. MC CABE: I'm going to object as to time.
8 I don't know when he heard it. I don't think you're
9 going to find out by that question. Can you clarify the
10 time period you're talking about?

11 MR. STOREY: That's fine.

12 BY MR. STOREY:

13 Q. Do you know when you heard from Gonzalo
14 Campos -- pardon me. Do you know when you heard that
15 Gonzalo Campos had acted inappropriately?

16 A. About 1982. Thereabouts. I'm not exactly
17 sure.

18 Q. And how did you learn?

19 A. The mother notified us.

20 Q. Okay. Did you speak with the mother?

21 A. Yes.

22 Q. Was the mother [REDACTED]?

23 A. [REDACTED]. [REDACTED]

24 Q. Thank you.

25 A. With a Y.

1 Q. [REDACTED]?

2 A. [REDACTED]. [REDACTED] That's what I think.

3 Q. And what did she tell you?

4 A. That [REDACTED], her son, told her that he had been
5 touched. She didn't tell me exactly. I don't remember
6 exactly.

7 Q. Okay. And who did you talk to about this?

8 A. With a body of elders.

9 Q. So the body of elders considered this
10 complaint?

11 A. Yes, two elders spoke later on with [REDACTED].

12 Q. Were you one of those elders?

13 A. I don't remember. I heard. I heard it at the
14 beginning -- and another elder -- but I don't know who
15 was assigned later.

16 Q. Did you ever speak to [REDACTED]?

17 A. I don't remember.

18 Q. Did you ever speak to Gonzalo?

19 A. The elders -- the elders had to talk to
20 Gonzalo. I don't remember if I myself spoke to Gonzalo.

21 Q. Okay. But your understanding is that at least
22 two elders would have spoken to Gonzalo?

23 A. Yes.

24 Q. And is it your understanding that those two
25 elders would have also spoken to [REDACTED]?

1 A. They had to talk to her, the lady.

2 Q. Is it your understanding that those two elders
3 would have also spoken to [REDACTED]?

4 THE INTERPRETER: [REDACTED]

5 MR. STOREY: [REDACTED].

6 THE INTERPRETER: [REDACTED]?

7 MR. MC CABE: [REDACTED].

8 THE INTERPRETER: [REDACTED] --

9 THE WITNESS: [REDACTED]?

10 THE INTERPRETER: [REDACTED].

11 MR. STOREY: Yes.

12 THE WITNESS: Yes, two elders had to be
13 assigned to the case.

14 BY MR. STOREY:

15 Q. Okay. Do you know what was the result of that
16 investigation by those two elders?

17 A. Yes.

18 Q. What was the result?

19 A. They didn't find a biblical basis in those two,
20 three witnesses, and there was no confession.

21 Q. So no judicial committee was formed?

22 A. No.

23 Q. Did you ever speak to anyone else about an
24 accusation that Gonzalo Campos had acted
25 inappropriately?

1 when she told you about what happened with Gonzalo
2 Campos and her son?

3 A. There were two of us. I don't remember who the
4 other was. I'm not sure. It's been too many years.

5 Q. And then after you heard from [REDACTED] that this
6 had happened, did you present that issue to the body of
7 elders?

8 A. Yes, the body of elders were -- had met.

9 Q. And who was present when the body of elders
10 met?

11 A. All five.

12 Q. What was said at that meeting?

13 A. What [REDACTED] had said.

14 Q. Was there then discussion about who would be
15 assigned to investigate the claim?

16 A. Two were assigned. I do remember.

17 Q. Were they given specific instructions on how to
18 proceed with the investigation?

19 A. No.

20 Q. Did you understand -- never mind. Strike that.

21 Did [REDACTED] tell you where the conduct by
22 Gonzalo Campos took place?

23 A. Well, in her home.

24 Q. Is it your understanding that Gonzalo Campos
25 was staying with the family?

1 A. We found out later that he was staying there.

2 Q. How did you find that out later?

3 A. Because [REDACTED] said it.

4 Q. So did you have more than one conversation with
5 [REDACTED]?

6 A. No, I just remember that she communicated that
7 to us. I don't remember speaking with her later. I
8 don't know.

9 Q. You said she communicated that to you. Were
10 all of her communications oral?

11 A. The communication was oral.

12 Q. There was never a written complaint?

13 A. No.

14 Q. And there would not have been a -- would there
15 have been a written finding by the elders who
16 investigated the claim?

17 A. It didn't proceed. There were no witnesses.
18 There's no file.

19 Q. Did you make an announcement -- do the elders
20 make an announcement to the congregation to find out if
21 there were other victims?

22 A. An announcement is never made.

23 Q. Were any efforts undertaken to determine if
24 there were any other victims of Gonzalo Campos?

25 A. Well, the matter was investigated, but it was

1 just what [REDACTED] said.

2 Q. When the body of elders discussed this issue,
3 was there any concern that Gonzalo may have done this to
4 other children?

5 A. No, because nothing had ever been heard, and
6 nothing was heard later either.

7 Q. Is it your understanding that Gonzalo Campos
8 joined the La Jolla congregation?

9 A. When it was divided, yes, because he lived --
10 or he lives in Pacific Beach.

11 Q. Was any warning given to the La Jolla
12 congregation that Gonzalo Campos had been accused of
13 acting inappropriately with a child?

14 A. No.

15 Q. Were the police contacted when [REDACTED]
16 brought this complaint forward?

17 A. No.

18 Q. Was anyone outside the congregation contacted?

19 A. I don't believe so. It wasn't that matter.

20 Q. Would that matter have been shared with people
21 who were not on the body of elders?

22 A. I don't believe so, no.

23 Q. Were any restrictions placed on Gonzalo Campos
24 at that time?

25 A. No.

EXHIBIT 11



toll free (877) DEPO 9-1-1

1 put it in a letter like this?

2 A I'm not sure because I did not speak to them
3 with regard to this matter.

4 Q Did you ever speak to anyone with regard to
5 Gonzalo Campos and any accusation against him?

6 MR. McCABE: Objection. I'm assuming you
7 don't mean any conversations with me.

8 BY MR. STOREY:

9 Q Excluding any conversations with your
10 attorney.

11 A No.

12 Q Were you ever made aware, other than
13 conversations with your attorney and today, that any
14 accusations had been made against Gonzalo Campos?

15 A If you'll repeat it again, please.

16 Q Other than conversations with your attorney
17 and here today, were you ever made aware that there had
18 ever been an accusation against Gonzalo Campos?

19 A The mother of the one who supposedly Campos
20 abused.

21 Q And tell me about that. What did she tell
22 you?

23 A Well, that Gonzalo Campos attempted to, or
24 abused, sexually abused her son.

25 Q And she told you about that?

1 A Yes.

2 MR. STOREY: Can we go off the record for just
3 a second?

4 (Off the record 11:09 to 11:10.)

5 BY MR. STOREY:

6 Q Who was the woman?

7 A The mother of [REDACTED].

8 Q And what did she tell you?

9 A Just that, that he tried to abuse him. I
10 don't know to what degree.

11 Q How did you respond to that?

12 A Well, the matter never again was discussed.

13 Q Did you think this was a serious matter?

14 A Well, it would seem to be, because then later
15 Gonzalo's mother and [REDACTED]'s mother spoke and
16 they took care of the matter amongst themselves.

17 Q Since they resolved the issue between
18 themselves, did you believe there was no need for a
19 judicial committee?

20 A Uh-huh.

21 Q At that time, did you investigate to see if
22 Gonzalo Campos had tried to do anything similar to other
23 children?

24 A No.

25 Q Did you tell anyone else about what [REDACTED]

1 MR. McCABE: Off the record.

2 (Recess taken from 11:22 to 11:35.)

3 BY MR. STOREY:

4 Q I don't have a whole lot more for you today.
5 I'd like to confirm, if you know, what year
6 you became an elder in the Linda Vista Spanish
7 congregation.

8 A '79.

9 Q So at the time you spoke to [REDACTED], you
10 were an elder?

11 A Yes.

12 Q After you spoke with [REDACTED], did you speak
13 with Gonzalo?

14 A No.

15 Q Did anyone speak with Gonzalo at that time?

16 A Not that I recall, no.

17 Because they resolved it between them, the two
18 mothers, Gonzalo's and the other boy's mother.

19 Q When you heard this complaint from [REDACTED],
20 did you think that it was serious?

21 A No.

22 Q To your knowledge, pardon me -- scratch that.
23 In your time with the Linda Vista Spanish
24 congregation, had anyone else ever been accused of
25 sexually abusing a child? I don't need names.

1 A No, no.

2 Q So this is the only one?

3 A The only one.

4 Q What did you understand happened to
5 ?

6 A Well, since the two women didn't seem very
7 upset, that I didn't take it as being that serious.

8 Q What was the specific conduct that Gonzalo was
9 accused of doing?

10 A Well, 's mother said that -- that he
11 tried to -- to touch his parts.

12 Q Do you understand it to be a crime for an
13 adult to touch a child's parts, as you used the word?

14 A Yes.

15 Q So you know that this conduct -- at the time
16 in 1980 -- scratch that.

17 When this complaint was made, you realized
18 that this conduct may be criminal?

19 A Yes.

20 Q But you didn't think that it was serious?

21 A I thought that it wasn't serious.

22 Q Did you think it was possible that
23 Gonzalo Campos would attempt to sexually abuse another
24 child?

25 A It could happen.

EXHIBIT 12

CONFIDENTIAL

SCS NOV 20 1986

Cong. Linda Vista Spanish 21642

Watchtower Society
25 Columbia Heights
Brooklyn, NY 11201

Estimados hermanos:

Con motivo de la formación de una nueva congregación en La Jolla, CA
y porque nuestra congregación es una de las congregaciones paternas, en esta
hoja suministramos la información que la Sociedad solicita:

CONGREGACIÓN: Linda Vista Spanish

1. NOMBRES DE LOS QUE YA HAN SIDO NOMBRADOS ANCIANOS Y SIERVOS MINISTERIALES,
TAL Y COMO APARECEN EN EL ÚLTIMO FORMULARIO S-2-S APROBADO POR EL CUERPO
GOBERNANTE, Y LAS POSICIONES QUE DICHS HERMANOS OCUPAN:

SUPERINTENDENTE PRESIDENTE:

Justino Díaz

SECRETARIO:

Dennis Palmer

SUPERINTENDENTE DE SERVICIO:

Román Ibarra

CONDUCTOR DE LA ATALAYA:

Dennis Palmer - Linda Vista
Ramón Preciado - La Jolla

SUPERINTENDENTE DE LA ESCUELA:

Ramón Preciado

SIERVOS MINISTERIALES: Rogelio Enriquez, Rodney Garcia, Jesús Martínez,
Roberto Rivera, Samuel Santiago, Lazaro Santos

RECOMENDACIONES PARA NUEVOS NOMBRAMIENTOS (S-2-S ADJUNTOS):

ANCIANOS:

Luis Rivera

SIERVOS MINISTERIALES:

REMOCIONES DEBIDO A QUE LOS SIGUIENTES HERMANOS PASAN A LA NUEVA CONGREGACION:

ANCIANOS:

Ramón Preciado, Luis Rivera

SIERVOS MINISTERIALES:

Roberto Rivera, Jesús Martínez

NOMBRES DE LOS PRECURSORES REGULARES QUE QUEDAN EN ESTA CONGREGACION:

Rogelio Enriquez, Arturo Jemio, Alicia Palmer

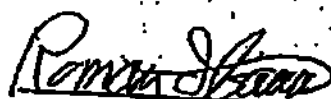

Marina Ayllón,

2. NUMERO DE PUBLICADORES: 55 PRECURSORES REGULARES: 4 TOTAL: 59 ?
(asi, la Sociedad puede determinar cuantos ejemplares de Nuestro Ministerio
del Reino continuaran enviando a la congregacion).

Sus hermanos:

80 kms

COMITE DE SERVICIO:



CONFIDENTIAL

SCS NOVEMBER 26, 1986
Cong. Linda Vista Spanish 21642

Watchtower Society
25 Columbia Heights
Brooklyn, NY 11201

Dear Brothers:

Because of the formation of a new congregation in La Jolla, CA, and because our congregation is one of the parent congregations, in this page we provide the information requested by the Society;

CONGREGATION: Linda Vista Spanish

1. NAMES OF THOSE WHO HAVE ALREADY BEEN APPOINTED AS ELDERS AND MINISTERIAL SERVANTS, AS THEY APPEAR IN THE LAST FORM S-2-S APPROVED BY THE GOVERNING BODY, AND POSITIONS THAT THESE BROTHERS OCCUPY:

SUPERINTENDENT PRESIDENT:
Justino Diaz

SECRETARY:
Dennis Palmer

SERVICES SUPERINTENDENT
Roman Ibarra

DIRECTOR OF THE WATCHTOWER
Dennis Palmer - Linda Vista
Ramon Preciado - La Jolla

SCHOOL SUPERINTENDENT
Ramon Preciado

MINISTERIAL SERVANTS: Rogelio Enriquez, Rodney Garcia, Jesus Martinez, Gonzalo Campos Rivera, Samuel Santiago, Lazaro Santos

RECOMMENDATIONS FOR NEW APPOINTMENTS (S-2-S ATTACHED)

ELDERS:
Luis Rivera

MINISTERIAL SERVANTS:

REMOVALS BECAUSE THE FOLLOWING BROTHERS TO GO TO THE NEW CONGREGATION:
ELDERS: Ramon Preciado, Luis Rivera

MINISTERIAL SERVANTS:

Gonzalo Campos Rivera, Jesus Martinez

NAMES OF THE REGULARS PRECURSORS REMAINING IN THIS CONGREGATION: Marina Ayllon, Rogelio Enriquez, Arturo Jemio, Alicia Palmer

2. NUMBER OF PUBLISHERS: 55 S PRECURSORS REGULAR: 4 TOTAL: 59
(thus, the Society can determine how many examples of Our Ministry of the Kingdom will continue to be sent to the congregation).

Your Brothers:

SERVICE COMMITTEE:

(Signature)

(Signature)

(Signature)

EXHIBIT 13

CERTIFIED COPY

Plaintiffs,

) No.

V.

Defendants.

REPORTED BY: NINA L. GRIMLER, CSR NO. 13117
FILE NO.: A509B80

A. Yes.

Q. And what congregation does this particular form relate to?

MR. COPLEY: This one we've marked?

MR. STOREY: Yeah, as Exhibit 3.

THE WITNESS: La Jolla, Spanish.

BY MR. STOREY:

Q. And what are the dates of the visit?

A. Oh. Let's see. April 28 through May 3rd, 1987.

Q. Just to clear up a question that you had earlier --

A. Uh-huh.

Q. -- would you look at the bottom right-hand corner of this document.

A. Uh-huh.

Q. Do you see the writing there that says, "Nueva c-o-n-g." period, "en enero," comma, "1987"?

A. Yes.

Q. What does that mean?

A. That the new congregation was formed as La Jolla Spanish -- officially La Jolla Spanish in 1987.

Q. In what month?

A. In January of 1987.

Q. Okay.

9. ¿Están los ancianos llevando bien la delantera en el servicio del campo?

Sí. Hay los dos que se esfuerzan bien para ayudar a la congregación seguir progresando. Congregación nueva comenzó en enero del año corriente. Están organizándose más para dar más ímpetu a la obra.

10. ¿Qué comentarios tiene en cuanto a la condición espiritual y las necesidades de la congregación, y qué hizo usted durante su visita para satisfacer esas necesidades? ¿Qué asuntos específicos que serían útiles a la congregación consideró usted con el cuerpo de ancianos?

La mayoría de los publicadores se conocían de antes que se hizo esta congregación nueva. Por eso, hay paz y unidad entre ellos. Hay varios nuevos que están asociándose con la congregación, y cinco nuevos publicadores comenzaron a predicar desde que se formó la congregación. Los cinco precursores asociados van a poder ayudar a la congregación seguir adelante en la predicación y en la obra de hacer discípulos. Los hispanos en el territorio están muy esparcidos y hay que llevar un buen registro y censo constante para poder hallarlos. Hay tres congregaciones de habla inglés, que al cubrir sus territorios de casa en casa, podrán encontrar las direcciones dónde viven los hispanos y entregarlas a esta congregación. Hay muchas hispanas que trabajan y viven en las casas de la gente de habla inglés. Los ancianos deberían comunicarse con los ancianos de habla inglés pedir su ayuda. Hay necesidad de ayudar a muchos nuevos y tímidos estudiar de antemano y prepararse bien para comentar durante las reuniones de congregación. Los conductores querrán ayudarlos personalmente, especialmente cuando efectúan la obra de pastoreo. También, es necesario ayudarlos preparar un horario de servicio semanal para mantenerse regulares cada semana en servicio a Dios, y aumentar el tiempo dedicado en el campo. Usar algún tiempo en la predicación para hacer las revisitas y tratar a comenzar un estudio bíblico. Los padres siempre querrán ayudar a sus propios hijos estudiar la biblia regularmente y enseñarlos cómo predicar las buenas nuevas.

ANCIANOS: Organizar bien la obra del pastoreo. Siempre llevar la información específica para edificar a cada publicador hacerse más informado en la verdad y sepa cómo llevar a cabo su ministerio. Cambiar un Estudio de Libro de Congregación al Salón del Reino por ahora. Cómo llevar bien los registros de la congregación. Cuentas necesitan mucha atención. Cuidar bien los precursores regulares. No se hizo. Los ancianos están al tanto. Se mudan del territorio.

12. ¿Hay problemas en la congregación que usted haya ayudado a tratar durante su visita? (Qué hizo usted? ¿Qué es necesario hacer todavía?) (Asuntos confidenciales que afectan sobre alguna persona deben informarse en una hoja aparte.)

13. ¿Qué consideró usted con los precursores durante su visita? (Liste los nombres de los precursores regulares.)

Cómo mantenerse fuertes espiritualmente, mantenerse al día con las publicaciones de la Sociedad. Cómo usarlas en su ministerio. Edificar sus estudios bíblicos con materiales incombustibles. Especialmente dar buena consideración al libro, 'Unidos en la adoración...'. Experiencias y problemas que se encuentran en el servicio del campo.

14. ¿Hay problemas relacionados con los precursores que precisen atención? Si así es, ¿qué hizo usted en cuanto a la atención, y qué es necesario hacer todavía? (Si se trata de algo confidencial, explique en una carta por separado.)

Miss Mary P. Salomone / Florence Christensen
Sra. Kathy Isquierdo
Sra. María Elena Arrue / Miss Cristina Palau

(Firma del superintendente de circuito)

(Llévese en duplicado por cada congregación a la cual se sirva. El original debe ser enviado inmediatamente a la oficina central; la copia debe dejarse en manos del superintendente presidente.)

EXHIBIT 14

April 11, 1994
Monmouth, Oregon.

To the Elders, Jehovah's Witnesses:

We recently found a letter that our son, John Victor Dorman III, wrote to a girl-friend. In the letter John mentioned that something happened to him when he was six years old. We couldn't imagine and were curious to know what John was writing. So, we asked John what the letter was about. To say the least his answer shocked us.

Therefore, we are writing to inform you of what we learned. When John was six years old and we were living in LaJolla, California, a friend of the family, Gonzalo Campos, took John with him and his mother to work a few times. Gonzalo and his mother cleaned houses in the area. It was on these occasions that Gonzalo sexually abused John. We have also been informed by John that Gonzalo abused another boy, Johnny Rivera. My wife called Johnny's father, Roberto Rivera. Mr. Rivera said that he had suspected that Gonzalo was not to be trusted and therefore has not let his family and son associate with him for a long time. Mr. Rivera said that he had already been told about this danger from [REDACTED]. Gonzalo had shown an interest in her son and she didn't think the situation seemed right. I wish we had also been suspicious and less trustful. My wife would always assure me that because someone is a Jehovah's Witness they can be trusted. Although I didn't take that assurance completely at face value, it did take me off my guard. I am informing you of Gonzalo's crimes and I hope it will help to protect any other victims and also because I understand he is an Elder in your congregation.

My wife called Gonzalo today and he admitted that the incident did occur and that the Elders were made aware of it several years ago. He said that he had repented and does not do these horrible acts anymore. We don't know if he is speaking the truth but we were informed that he was made a ministerial servant at about the same time of this "claimed" repentance. The statements seem to contradict themselves and we are confused as to what is the truth. We are therefore prompted to write and make sure you are aware of these things and what he has done. Although this happened ten years ago, we just found out about it today. For us it seems as if it just happened. I don't think you can imagine how painful this is unless you have experienced it yourself. It explains some of the ways that we can see how it still effects our son. It is very obvious that he is still full of anger about it. We are sorry, and in a way blame ourselves, that we trusted Gonzalo Campos. He is not worthy of trust and I am sure not representative of the Jehovah's Witnesses. I hope, therefore you will accept this information in order to understand his character and morals as a leader and role model for the congregation.

Sincerely,


John Dorman


Manuela Dorman

EXHIBIT 15

SSX APR 20 1984

Monmouth English Congregation

140 Main Street
600 S College St
Monmouth, OR 97301

April 13, 1984

Watchtower
c/o Service Desk
25 Columbia Heights
Brooklyn, NY 11201

Dear Brothers:

I am forwarding a letter given me by one of our publishers on the 11th of April. As you will notice the information it contains was quite a shock to the parents. John Dorman Sr. is not one of Jehovah's Witnesses but has been very considerate with his wife even aiding her in contacting Jehovah's Witnesses when they have moved from town to town. Through her he has put a great deal of trust in Jehovah's Witnesses and now is in a state of shock.

As mentioned in the letter Stelar Dorman called Gonzalo Campos and he readily admitted his guilt to her and as the letter shows he said he had approached the elders in the LaJolla Congregation, however Stelar Dorman has a hard time believing this since he had never contacted them about the abuse he had rendered their son John Jr.

The elders here in Monmouth have noticed that John Jr. has little respect for any kind of authority. Before moving here we understood he had been an unapplied publisher. It is very possible this event in his life was quite traumatic.

It also would seem doubtful to us that Gonzalo could have been recommended to be a Ministerial Servant at about the time of the abuse if the elders there had known about his guilt.

I called the Society's Legal Dept. and they advised me to send this information to you to determine if the Society may have a record of Gonzalo Campos' past. If not I am sure you can contact the congregation in LaJolla, California as we do not know the address of the presiding overseer.

It is situations like this that can certainly mess up a young person's life and also bring reproach on Jehovah's organization. I am confident you will look into this situation.

May Jehovah continue to be with you brothers as we continue to draw near to this systems end.

Your brother,

Tom Neeve

Presiding Overseer

EXHIBIT 16

SDV JUN 13 1994

SDI:SSU

June 9, 1994

BODY OF ELDERS
ENGLISH CONGREGATION OF
JEHOVAH'S WITNESSES, MONMOUTH, OR
c/o KENNETH NISSEN
566 S COLLEGE ST
MONMOUTH OR 97361

Dear Brothers:

We hereby acknowledge receipt of your letter about the conduct of Gonzalo Campos. We appreciate your bringing this matter to our attention. We have forwarded John and Manuela Dorman's letter to the elders of the Playa Pacifica Spanish Congregation in San Diego, California. Therefore, please reassure the Dorman's that matters are being looked into and that this kind of conduct is not tolerated among Jehovah's Witnesses.

May Jehovah continue to bless your faithful service, and we take this opportunity to send our warm Christian love and best wishes.

Your brothers,

cc: Body of elders
Playa Pacifica Spanish Congregation, San Diego, CA

P.S. to the elders:

Enclosed please find a photocopy of a self-explanatory letter we have deemed appropriate to send to you. We would like to receive a report from you on whether this matter was ever handled. Did Brother Campos confess his wrong deeds? If so, why was he recommended as a ministerial servant? If he has not confessed his wrongdoing, you will need to confront him with the accusations. Should he admit them, a judicial committee should be appointed right away to determine his degree of repentance.

We would appreciate a prompt reply on this matter in view of the time that has already elapsed. When answering, please make reference to this letter by date and desk symbols. Thank you very much.

EXHIBIT 17



KINGDOM HALL OF JEHOVAH'S WITNESSES
PLAYA PACIFICA SPANISH CONGREGATION
4243 INGRAHAM STREET
SAN DIEGO, CA. 92109 619-273-8463

SSU APR 21 1995

Abril 14 de 1995.

Queridos hermanos: Watchtower

Se ha hecho un cambio pertinente de nuestro superintendente presidente Luis Rivera. El hermano Florentino Gracia estara sirviendo como superintendente presidente temporal hasta que el superintendente de circuito nos visite.

ATTE. Sus hermanos trabajando en los intereses del Reino.

Comite de Servicio.

FLORENTINO GRACIA
Florentino Gracia Sup.P.

Eduardo Chavez
Eduardo Chavez Sup.S.

Gonzalo Campos
Gonzalo Campos Sec.

EXHIBIT 18

NOTIFICACIÓN DE EXPULSIÓN O DESASOCIACIÓN

(Sirvanse escribir toda la información a máquina o con letra de molde y tinta.)

Playa Pacifica San Diego CA 98806
 Nombre de congregación Ciudad Estado Número de congregación
 Gonzalo Campos
 Nombre de la persona expulsada o desasociada
 9 de Junio, 1995
 Fecha del anuncio de expulsión o desasociación
 Fecha de restablecimiento

Marquen los encasillados correspondientes, si aplican: ☒ Anciano ☐ Siervo ministerial ☐ Precursor regular o especial
☐ Alzado con la Sociedad como la persona que recibe la literatura o las revistas (Sirvanse enviar el nombre y la dirección nuevos)

Ofensa(s) por la(s) cual(es) se expulsó a la persona (si ella se desasoció, indiquen la razón):

Abuso sexual de niño, comenzando en Dic. de 1991 y terminando en Dic. de 1994. El abuso incluyó masturbación manual, sexo anal y oral.

Sirvanse proporcionar un resumen breve, pero completo, del asunto: 1) ¿Qué condujo a la comisión del mal? 2) ¿Se había aconsejado o censurado anteriormente a la persona? 3) ¿Qué factores, incluso la falta de obras propias de arrepentimiento, los llevaron a tomar esa decisión? (Vean el punto núm. 3 al dorso.) (Usen una hoja adicional si necesitan más espacio.)

Gonzalo mismo había sido abusado sexualmente de niño. Después de su bautismo en 1980, abusó sexualmente a tres niños de su congregación. El recibió consejo en 1982, y se lo formó un comité judicial en 1986. El fue nombrado Siervo Ministerial en Sept. de 1988, y empezó a abusar a un niño de 11 años de edad en Dic. de 1991. El abuso continuó aun después de su nombramiento como siervo en Junio de 1993, y se terminó en Dic. de 1994 cuando la familia del niño se mudó de la ciudad. El fue descubierto solo por la acusación de la madre del niño en Mayo de 1995.

Algunos de los factores que tomamos en consideración fueron:

1. Tuvo una pacífica de abuso que abarcaba 14 años.
2. Recibió consejo y disciplina exterior.
3. El no paró por su cuenta, ni vino a confesar por su cuenta.
4. Falta de obras de arrepentimiento. Durante el comité judicial, él menta para cubrir lo extenso de sus pecados, se le tuvo que confrontar con evidencia cada vez, y quiso imputar parte del culpa al víctima del abuso.

¿Qué evidencia se presentó del mal, tal como una confesión, dos o más testigos, etc.?

Firmas de los ancianos que sirvieron en el comité. (Escriban los nombres en letra de molde o a máquina debajo de las líneas. Firmen en las líneas.) (Si se trata de una desasociación, el comité seleccionado para tratar el caso debe firmar.)

Equelito Chavez

Jesus Martinez

Florentino Gracia

Kevin Phillips

¿Apela la persona de la decisión de ustedes? No Si es así, debe llenarse este formulario y entregarse al que preside el comité de apelación, quien lo enviará a la Sociedad con una carta del comité de apelación. Si el comité original quiere añadir más comentarios, debe ponerlos por escrito y dárselos al comité de apelación para que éste los envíe a la Sociedad.

Si la persona había sido expulsada o se había desasociado anteriormente, indiquen: 1. Fecha
 2. Nombre de la persona entonces
 3. Fecha de restablecimiento
 4. Congregación que tomó la acción: Nombre de la congregación Ciudad Estado

NOTA: Envíen a la Sociedad el original de este formulario junto con las tarjetas S-79a-S y S-79b-S que ustedes han llenado. Retengan una copia de este formulario en los archivos confidenciales de la congregación. Después que la Sociedad reciba estos formularios, se les devolverá la tarjeta S-79b-S. Si se restablece a la persona (o ella muere), envíen a la Sociedad la tarjeta S-79b-S y anoten en su copia del formulario S-77-S la fecha de restablecimiento (o de la muerte).

INSTRUCCIONES A SEGUIR PARA INFORMAR EXPULSIONES O DESASOCIACIONES

El comité judicial utilizará las tarjetas S-79a-S y S-79b-S y los formularios S-77-S para suministrar información a la Sociedad cuando manejen casos de expulsión. Cuando una persona se desasocia, se nombrará un comité para tratar el asunto, y el comité debe emplear estos mismos formularios para informar a la Sociedad. Se utilizarán los formularios y los sobres azules especiales de la siguiente manera:

Notificación de Expulsión o Desasociación (S-77-S): Llenen el original y una copia al carbón. Retengan la copia al carbón en los archivos confidenciales de la congregación y envíen el original a la Sociedad en el sobre azul especial.

Registro de Expulsión o Desasociación (S-79a-S y S-79b-S): Llenen los originales de cada una de estas tarjetas. Deben enviarse a la Sociedad ambas tarjetas, la S-79a-S y la S-79b-S, junto con el formulario S-77-S. Se retendrá en los archivos de la Sociedad la tarjeta S-79a-S. La Sociedad estampará en la tarjeta S-79b-S la fecha en que se hizo el registro y entonces la devolverá a la congregación. Una vez que la reciban de vuelta, pongan la tarjeta S-79b-S, junto con su copia del formulario S-77-S, en los archivos confidenciales de la congregación.

Si se restablece a la persona (o ella muere), el secretario debe poner en la tarjeta S-79b-S la fecha en que sucedió esto, firmarla y enviarla a la Sociedad en el sobre azul especial. También debe registrarse esta fecha en su copia del formulario S-77-S.

Sobres azules: Estos sobres azules especiales solo se usarán cuando se envíen a la Sociedad los formularios antes mencionados o cuando se envíe a la Sociedad correspondencia relacionada con asuntos judiciales. Sirvanse no usar los sobres azules para enviar cualquier otra correspondencia.

PUNTOS QUE SE DEBEN REPASAR CUANDO MANEJEN CADA CASO

1. Los arreglos que tiene que hacer el cuerpo de ancianos para asignar a hermanos capacitados para que sirvan en el comité judicial.
2. El procedimiento que debe seguir el comité judicial.
3. La información más reciente en cuanto a cómo identificar el arrepentimiento verdadero y las obras propias del arrepentimiento.
4. Las instrucciones sobre cómo encargarse de una apelación, en caso de que se apele de la expulsión.

DO NOT DESTROY
NOTIFICATION OF EXPULSION OR DISASSOCIATION
(Please write all information on typewriter or print in ink.)

Playa Pacifica San Diego CA 98806
Name of Congregation City State Number of Congregation

JUNE 23, 1995

Gonzalo Campos
Name of person expelled or disassociated June 9, 1995 21/APR/00
Date of announcement Date of
expulsion or reestablishment
disassociation

Mark the corresponding boxes, if applicable: (X) Elder () Ministerial servant () Regular or
special precursor () Listed with the Society as a
person that receives literature or magazines
(Please send new name and address.)

DO NOT DESTROY

Offense(s) for which the person was expelled (if the person disassociated on his/her own, indicate the reason):

Please provide a brief summary, but complete, of the matter: 1) What led to the commission of the bad act
2) Had the person been advised or censured previously? 3) What factors, including the lack of proper acts
of repentance, led the person to that decision? (See point number 3 in back.) (Use additional page if you
need more space.)

What evidence was presented of the bad act, such as a confession, two or more witnesses, etc.?

Signatures of the elders who served in the committee. (Print or typewrite the names under the line. Sign
on the line. (If this is a disassociation, the committee selected to deal with the case must sign.)

(Signature)
Eduardo Chavez
(Signature)
Jesus Martinez

(Signature)
Florentino Garcia
(Signature)
Kevin Phillips

Did the person appeal your decision? No If so, this form must be filled out and handed to the
appeals committee president, who shall send it to the Society with a letter of the appeals committee. If
the original committee wants to add more comments, it must do so in writing and give them to the appeals
committee so that it may send them to the Society.

If the person had been expelled or had disassociated himself/herself previously, indicate:

1. Date _____ 2. Name of the person at that time _____
3. Date of reestablishment _____
4. Congregation that took the action: _____
Name of the Congregation City State

NOTE: Send the original of this form to the Society along with cards S-79a-S and S-79b-S that you have
filled out. Retain a copy of this form in the confidential files of the congregation. After the Society
receives these forms, the card S-79b-S will be returned to you. If the person is reestablished (or if the
person dies), send a card S-79b-S to the Society and indicate in your copy of Form S-77-S the date of
reestablishment (or of death).

S-77-S 2/92

(SEE BACK)
W1000006

September 20, 1995
Printed in USA

INSTRUCTIONS TO FOLLOW TO INFORM REGARDING EXPULSIONS OR DISASSOCIATIONS

The judicial committee shall use the cards S-79a-S and S-79b-S and form S-77-S to provide information to the Society when managing expulsion cases. When a person disassociates himself/herself, a committee shall be named to deal with the matter, and the committee must use these same forms to inform the Society. The forms and the special blue envelope shall be used in the following manner:

Notification of expulsion or disassociation (S-77-S): Fill out the original and a carbon copy. Retain carbon copy in the confidential files of the congregation and send the original to the Society in the special blue envelope.

Registration of expulsion or disassociation (S-79a-S and S-79b-S): Fill out the originals of each of these cards. Both cards, S-79a-S and S-79b-S, must be sent to the Society, along with the form S-77-S. Card S-79-S shall be retained in the files of the Society. The society shall stamp on card S-79b-S the date on which the registration was made and then it shall return it to the congregation. Once you receive card S-79b-S, place it along with your copy of Form S-77-S in the confidential files of the congregation.

If the person is reestablished (or dies), the secretary must place on card S-79b-S, the date on which this happened, sign it and send it to the Society in the special blue envelope. This date must also be registered in your copy of form S-77-S.

Blue envelopes: These special blue envelopes shall only be used when sending the aforementioned forms to the Society or when sending to the Society correspondence related to judicial matters. Please do not use the blue envelopes to send any other correspondence.

POINTS THAT MUST BE REVIEWED WHEN HANDLING EACH CASE

1. The arrangements that the body of elders must make in order to assign brothers capable of serving in the judicial committee.
2. The procedure that the judicial committee must follow.
3. The most recent information regarding how to identify true repentance and acts proper of repentance.
4. The instructions regarding how to deal with an appeal, in case the expulsion is appealed.

NOTICE OF DISFELLOWSHIPING OR DISASSOCIATION

Playa Pacifica

San Diego

CA

98806

Gonzalo Campos

June 9, 1995

☒ Elder

Sexual abuse of a minor, starting in Dec. 1991 and ending in Dec 1994. The abuse included mutual masturbation, anal and oral sex.

Gonzalo himself was sexually abused as child. After his baptism in 1980, he sexually abused three children in the congregation. He was counseled in 1982, and a judicial committee was formed in 1986. He was appointed a Ministerial Servant in Sept. 1988, and started abusing of an 11 year old male child in Dec 1991. The abused continued even after his appointment as elder in June of 1993, and it ended in Dec. 1994 when the family of the child moved from the city. He was discovered only by the accusation from the child's mother in May of 1995.

Some of the factors taken into consideration were:

1. His practice of abuse lasted 14 years.
2. He received counsel and discipline before
3. He did not stop on his own, nor did he confess on his own.
4. Lacking works of repentance. During the judicial committee, he lied to cover the extent of his sins, he had to be presented with evidence each time, and he wanted to impute part of the blame on the victim of abuse.

{Signature}

Eduardo Chavez

{Signature}

Floreutino Gracia

{Signature}

Jesus Martinez

{Signature}

Kevin Phillips

No

INSTRUCTIONS TO FOLLOW TO REPORT DISFELLOWSHIPPINGS O DISASSOCIATIONS

EXHIBIT 19

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 IN AND FOR THE COUNTY OF SAN DIEGO
3

4 JOHN DORMAN, INDIVIDUALLY, AND)
5 JOEL GAMBOA, INDIVIDUALLY,)

6 Plaintiffs,)

7 vs.)

8 DEFENDANT DOE 1, La Jolla Church;)
9 DEFENDANT DOE 2, Linda Vista)
Church; DEFENDANT DOE 3,)
Supervisory Organization;)
10 DEFENDANT DOE 4, Perpetrator; and)
DOES 5 through 100,)

11 Defendants.)
12 _____)
13
14
15

CERTIFIED COPY

No. 37-2010-00092450
CU-PO-CTL

16 DEPOSITION OF KEVIN PHILLIPS

17 San Diego, California

18 October 19th, 2011
19
20

21 ATKINSON-BAKER, INC.

22 COURT REPORTERS

(800) 288-3376

23 www.depo.com

REPORTED BY: Leesah Teran, CSR NO. 12675

24 FILE NO.: A509B82
25

Q. There is a sentence here in the far left, a couple lines down it starts Ofensas. Do you see that sentence?

A. Yes.

Q. And below that there is some language there that appears in bold. What does that language indicate?

A. It indicates the reason that Gonzalo was disfellowshipped.

Q. What reason was that?

MR. McCABE: I am going to object that the document speaks for itself.

Go ahead. You may answer.

THE WITNESS: It indicates that Gonzalo was guilty of sexually abusing a child starting from December 1991 through December of 1994.

BY MR. STOREY:

Q. What child is that document referring to?

A. That refers to Joel Gamboa.

Q. It does not refer to John Dorman?

A. No.

Q. Why is it that he was not also disfellowshipped for the abuse of John Dorman?

A. The specific case that we were addressing at that judicial committee was the accusation made by Ms. Cervantes, that her son had been disfellowshipped

and Gonzalo --

MR. McCABE: No. No. No. You said that her son had been disfellowshipped.

THE WITNESS: Oh, her son had been abused. I am sorry -- and so that was specifically what we were addressing in this judicial committee. It was also -- we believed at the time that he had been previously or there had been a previous judicial committee that had addressed issues that had happened before that, so we did not address them in this particular case.

BY MR. STOREY:

Q. So the most recent complaint had been by Ms. Cervantes, so that is what you were addressing with this judicial committee, correct?

A. Right.

Q. Okay.

Now, if you will -- there is another paragraph there, the form document there is -- below there is more language in bold. There is a sentence that starts in the second line that starts with "el recibio."

A. Right.

Q. What does that sentence indicate?

A. It indicates that we believed that he had been counseled in 1982 and that a judicial committee had been formed in 1986.

EXHIBIT 20

Congregación Playa Pacifica Spanish
San Diego, California

3147 Claremont Drive #4, San Diego, CA 92117-6434

4 de julio de 1999

Service Department
Watchtower Bible and Tract Society
of New York, Inc.
100 Watchtower Drive
Patterson, NY 12563-4204

Estimados Hermanos;

Les escribimos con respecto al caso de Gonzalo Campos. El fue expulsado el 9 de junio de 1995 por abuso de menores. El ha pedido restablecimiento tres veces. La última vez fue en enero del año en curso. También tenemos a mano su carta SDG:SSE 7 de enero de 1997. En vista de la seriedad del asunto, y a la vez el tiempo que ha pasado desde su expulsión, les queremos hacer unas preguntas. Pero, primero les damos un cuadro completo de acuerdo con las instrucciones de la carta del 14 de marzo de 1997 dirigida a "Todos los cuerpos de ancianos".

La última vez que el cometió el pecado fue en la primavera de 1995, cuando el tenía 25 o 26 años de edad. Sus víctimas tenía 5, 6, 7, 11 años de edad. El practicaba este pecado por largo tiempo. Durante sus años de bautizado, el abusó de tres niños y intentó abusar de dos más. La comunidad no sabe de esto y no hubo nada de publicidad al respecto. Todo sucedió en la congregación y por eso no ha sido enjuiciado. Las familias de las víctimas saben lo que pasó y muchos miembros de nuestra congregación y de la congregación Linda Vista saben de ello. Antes el iba a Linda Vista. Ninguna de las víctimas ni miembros de su familia están en nuestra congregación. Dos víctimas y sus familias se han mudado del estado. Una tercera familia se mudó de la congregación y es inactiva, el abusaba de los tres hijos de esa familia. Las víctimas están muy disgustadas con él. Hasta una de ellas vino hace uno o dos años para supuestamente matarlo. Pero, no lo encontró por que se equivocó de congregación, fue a Linda Vista. Sin duda algunos hermanos que saben de esto todavía están disgustados con él. Debido al gran daño que ha causado y la traición de su puesto de superintendente, dos ancianos del comité original los hermanos Kevin Phillips y Jesús Martínez lo encuentran difícil perdonarle ahora. El tercer hermano Eduardo Chávez entiende la seriedad del asunto pero a la vez reconoce que cuatro años de expulsión es bastante. A la vez, unos hermanos de ambas congregaciones creen que ya es bastante el tiempo que tiene de expulsado.

El 27 de junio, el hermano Eduardo Chavez, anciano de Linda Vista y Hermano Ronald Cortez de Playa Pacifica hablaron con la hermana Berta Gómez, la abuela de uno de las víctimas. Todavía ella esá muy lastimada y sentida por lo que pasó. Ella lloró al hablar de esto. Está muy afectada por que ha afectado mucho a su hija, (Hugolina Cervantes la madre de una víctima), y nietos (Joel era víctima). Está especialmente decepcionado con Gonzalo por que era anciano y le confiaban el cuidado de sus nietos. A veces ha tenido ganas de llamar a la policía, llevarlos a donde Gonzalo y denunciarlo. No obstante, aunque ella está muy lastimada, está dispuesta a aceptar que Jehová lo perdone y

3-Rivera
1-Joel
Cervantes
1-Washington
1-Caso de
1985
1-miyo (de dalia)
estudio

Especialmente
por que no
confesó
Confesó que
había abusado
de los tres
niños
Roberto Rivera
hoy en día
después lo
confesó
un año
después
Cuanto tiempo
restablecimiento
Parece que lo razón fue
una cosa

Joel Cervantes (108 al 118) ~~108 al 118~~
 2 1/2 a 3 años (lechón)
 Joshua Rivera (7-8) (un año)
 Johnny Dorman (6-7 al 10) (Fue a Washington)
 Johnny (6) Cristina (5-6) Rivera (203 ocasiones)
 (una o dos ocasiones) (una ocasión)

- ① Hijo de [redacted] (6-7) una ocasión
 Acarició los órganos del niño, y tocó al niño con su miembro viril pero no hubo sexo anal
- ② [redacted] (8-9) - en una ocasión
 Acarició los órganos del niño - dentro de la ropa
- ③ Johnny Rivera (203 ocasiones - le acarició los órganos genitales dentro de la ropa. Luchaban jugando hacia la lucha libre.
- ④ Cristina Rivera (6-7 años) 102 veces - le acarició a ella sus órganos dentro de la ropa.

Playa Pacifica Spanish Congregation
San Diego, California
Clairmont Drive #4, San Diego, CA 92117-6434

July 4, 1999

Service Department
Watchtower Bible and Tract Society
of New York, Inc.
100 Watchtower Drive
Patterson, NY 12563-4204

Dear Brothers,

We are writing regarding the case of Gonzalo Campos. He was disfellowshipped on June 9, 1995 for abusing of minors. He has requested reinstatement three times. The last time was in January of this year. Also, we have in hand your letter dated SDG:SSE January 7, 1997. In view of the seriousness of the matter, and at the same time the time that has passed since his disfellowshipping, we would like to ask some questions. But, first we provide you the full picture in accord with the instructions in the March 14, 1997 letter addresses to "All bodies of elders."

The last time he committed the sin was in the spring of 1995, when he was 25 or 26 years old. His victims were 5, 6, 7, 11 years of age. He practiced this sin for a long time. During his years of being baptized, he abused of five seven children and tried to abuse of two more. The community does not know of all this and there was no publicity about this. Everything took place in the congregation and because of that he was not prosecuted. The victim's families know what happened and many members of our congregation and from the Linda Vista congregation know about it. He attended Linda Vista before. None of the victim or their family members

family moved from the congregation victims and their families have moved out of state. A , he abused of that family. The victims are very disgusted with him. One of the female victims even came a year or two ago to supposedly kill him. But she did not find him because she was mistaken with the congregation, she went to Linda Vista. Without a doubt some brothers who know about this are still disgusted with him. Due to the great damage that he caused and the betrayal of his appointment as overseer, two elders of the original committee Brothers Kevin Phillips and Jesus Martinez find it hard to forgive him now. (have serious reservations) The third brother Eduardo Chavez understands the seriousness of the matter but at the same time that four years of being disfellowshipped is sufficient. At the same time, some brothers from both congregations believe that it is now sufficient time that he has been disfellowshipped.

On June 27, Brother Eduardo Chavez, elder in Linda Vista and Ronald Cortez of Playa Pacifica spoke to one of the victims. is still very hurt and feels for what happened. cried as she spoke about this. is very affected because it has affected very much, (the mother of one victim), is especially disappointed with Gonzalo because he was an elder and she trusted him with the care of

At times she has had the urge to call the police, take them to Gonzalo and denounce him. However, even though is very hurt, : is willing to accept that Jehovah forgive him and

- **Johnny Dorman (7 or 8...)** One or two occasions
(was from Washington)

EXHIBIT 21

SSEDEC 13 1996

Congregación Playa Pacifica

de Kevin Phillips
7575 Winterwood Ln.
San Diego, CA 92128

November 13, 1995

Watchtower Bible and Tract Society
Departamento de Servicio

Dear Brother:

Tomamos esta oportunidad para expresar nuestros saludos calorosos. Les mandamos esta carta para informarles de acontecimientos recientes en el caso de Gonzalo Campos, expulsado desde Mayo de 1985, y para pedir su dirección al respecto.

La expulsión de Gonzalo fue resultado de su abuso sexual de varios niños de la congregación desde aproximadamente 1983 hasta 1985, tanto hijos de estudiantes como de hermanos bautizados. Ese abuso había continuado a pesar de que se le hizo un comité judicial alrededor de 1983, y durante el tiempo que él sirvió en la capacidad de siervo ministerial y anciano.

Desde su expulsión, Gonzalo ha continuado regular en su asistencia a las reuniones, y en Septiembre de 1995 nos presentó una carta pidiendo su reestablecimiento. Le dejamos saber que era muy temprano en ese entonces para que lo consideráramos. Hace dos meses, en Septiembre de 1995, lo visitamos con el propósito de conocer su condición actual.

Durante esa visita, Gonzalo nos dejó saber que él había abusado sexualmente a los tres niños de una familia que se mudó de congregación alrededor del mismo tiempo en que él fue expulsado. Durante el proceso del comité judicial de 1985, nosotros sospechábamos que Gonzalo había abusado al mayor de estos hijos, pero Gonzalo lo negó rotundamente. Resulta que durante el tiempo que llevamos a cabo el caso judicial contra él, Gonzalo estaba en trámite de comprar una casa del este zócalo familiar, y tenía miedo de perder la casa si se revelara sus acciones. Ahora que lo visitamos en Septiembre, nos dejó saber de ese abuso, lo cual tomó lugar de los años 1986 a 1992.

Dicha familia se había ido sin dejarnos saber adónde fueron. Sin embargo, el día 2 de Noviembre los encontramos por casualidad, y los padres nos dijeron que supieron del abuso hace algunos siete meses (quizás en Abril '96). No hemos podido averiguar todavía qué tanto saben del grado del abuso que sufrieron sus hijos.

September 10, 1994

Estamos especialmente interesado en su dirección sobre dos asuntos:

1. Como debemos proceder con la familia cuyos hijos fueron abusados?
2. Dadas las circunstancias de su expulsión y las revelaciones recientes, cuanto tiempo sugieran que debería pasar antes de que volvamos a considerarlo para reestablecimiento?

Desearnos mucho que el espíritu de Jehová les de dirección perspicaz para que podamos manejar esta situación delicada con sabiduría. Estaremos en espera por su respuesta. Que Jehová los bendiga en todo su duro trabajo.


Sinceramente,



Kelvin Phillips-S. Presidente



Erasmo Flores-S. de Servicio



Juan Velazquez-Secretario

Congregación Playa Pacifica

Atto Nino (Philip)
7070 Wilshire Blvd. L.A.
Bos. (310) 461-1231

November 13, 1996

**Watchtower Bible and Tract Society
Service Department**

Dear Brothers:

We take this opportunity to express our warm greetings. We are writing this letter to inform you of recent events in the case of Gonzalo Campos, disfellowshipped since May 1995, and to request direction from you in this regard.

Gonzalo was disfellowshipped as a result of sexually abusing several children in the congregation since approximately 1983 until 1995, children as well. This abuse had continued even though a judicial committee was formed around 1988, and during the time he served in the capacity of a ministerial servant and elder.

Since his disfellowshipping Gonzalo has been regular in attending meetings and in September of 1995 he gave us a letter requesting his reinstatement. We let him know that, at that time, it was too early for us to consider it. Two months ago, in September of 1996, we visited him for the purpose of knowing his current condition.

During the visit, Gonzalo informed us that he had sexually abused of a family that moved out of the congregation around the same time that he was disfellowshipped. During the 1995 judicial committee process, we had suspected that Gonzalo had abused the oldest of these, but Gonzalo adamantly denied it. It turns out that during the time we handled the judicial case against him, Gonzalo was in the process of buying a house; and he feared losing the house if he revealed his actions. When we visited him in September, he let us know about that abuse, which occurred in the years 1986 to 1992.

Said family had left without saying where they were going. However, on November 2, by coincident we ran into them, and the parents told us that they knew about the abuse seven months ago (maybe in April '96). We have still not been able to find out how much they know about the abuse that their children suffered.

September 10, 1994

We are especially interested in your direction regarding two matters:

1. How should we proceed with the families whose were abused?
2. Given the circumstances of his disfellowshipping and the recent revelations, how much time do you think we should allow to pass before we consider his reinstatement again?

Our wish is that Jehovah's spirit gives you the insight direction so that we can handle this delicate situation with wisdom. We await your response. May Jehovah bless your hard work.

Sincerely,

{Signature}
Kevin Phillips- Presiding Overseer

{Signature}
Enasmo Flores Service Overseer

{Signature}
Jesus Martinez- Secretary

EXHIBIT 22

SFH AUG 02 1999

Congregación Playa Pacifica Spanish
San Diego, California
3147 Clarkmont Drive #4, San Diego, CA 92117-6134

24 de julio de 1999

Service Department
Watchtower Bible and Tract Society
of New York, Inc.
100 Watchtower Drive
Paterson, NY 12563-4204

Estimados Hermanos;

Les escribimos con respecto al caso de Gonzalo Campos. El fue expulsado el 9 de junio de 1995 por abuso de menores. El ha pedido restablecimiento tres veces. La última vez fue en enero del año en curso. También tenemos a mano su carta SDG:SSE 7 de enero de 1997. En vista de la seriedad del asunto, y a la vez el tiempo que ha pasado desde su expulsión, les queremos hacer unas preguntas. Pero, primero les damos un cuadro completo de acuerdo con las instrucciones de la carta del 14 de marzo de 1997 dirigida a "Todos los cuerpos de ancianos".

La última vez que el cometió el pecado fue en la primavera de 1995, cuando él tenía 25 o 26 años de edad. Sus víctimas tenía entre 6 a 8 años de edad cuando empezaba de abusar de ellos. El practicaba este pecado por largo tiempo. De acuerdo con la explicación de *La Atalaya* de 1 de febrero de 1997, página 29 entendemos que abuso sexual de niños incluye cópula anal y/o tocamientos del niño. Por eso, concluimos que abusó de siete niños (seis varones y una niña). Con tres tuvo cópula anal, otros tres les tocaba los órganos genitales de ellos dentro de su ropa y con uno le tocó los genitales del niño y le tocó el niño con su miembro viril. ¿Entendimos correctamente la explicación de *la Atalaya*? ¿Se considera tocamientos de los genitales como abuso sexual?

La comunidad no sabe de todo esto y no hubo nada de publicidad al respecto. Todo sucedió en la congregación y por eso no ha sido enjuiciado. Las familias de las víctimas saben lo que pasó y muchos miembros de nuestra congregación y de la congregación Linda Vista saben de ello. Antes él iba a Linda Vista. Ninguna de las víctimas ni miembros de su familia están en nuestra congregación. Dos víctimas y sus familias se han mudado del estado. Una tercera familia se mudó de la congregación y es inactiva, él abusaba de los tres hijos de esa familia. Las víctimas están muy disgustadas con él. Hasta una de ellas vino hace uno o dos años para supuestamente matarlo. Pero, no lo encontró. Sin duda algunos hermanos que saben de esto todavía están disgustados con él. Debido al gran daño que ha causado y la traición de su puesto de superintendente, dos ancianos del comité original los hermanos Kevin Phillips y Jesús Martínez tienen serias reservaciones tocante a restablecerlo. Especialmente por que no confesó todo la primera vez. Un año después cuando pidió restablecimiento por primera vez confesó que había abusado de los tres hijos del hermano [REDACTED]. El tercer hermano Eduardo Chávez entiendo la seriedad del asunto pero a la vez reconoce que cuatro años de expulsión es bastante. A la vez, unos hermanos de ambas congregaciones creen que ya es bastante el tiempo que tiene de expulsado.

El 27 de junio, el hermano Eduardo Chavez, anciano de Linda Vista y Hermano Ronald Cortez de Playa Pacifica hablaron con la hermana [REDACTED], la abuela de uno de las víctimas. Todavía ella está muy lastimada y sentida por lo que pasó. Ella lloró al hablar de esto. Está muy afectada por que ha afectado mucho a su hija, ([REDACTED] la madre de una víctima), y nietos ([REDACTED] era víctima). Está especialmente decepcionado con Gonzalo por que era anciano y le confiaban el cuidado de sus nietos. A veces ha tenido ganas de llamar a la policía, llevarlos a donde Gonzalo y denunciarlo. No obstante, aunque ella está muy lastimada, está dispuesta a aceptar que Jehová lo perdone y restablezca a Gonzalo. Está dispuesta a aceptar en persona una disculpa de Gonzalo. Mientras tanto, el nieto de ella que es víctima y su hermano no quieren tener nada que ver con la verdad. Los dos están amargados y enojados con Gonzalo. Hasta han expresado el deseo de hacerle daño. Su hija está sentida pero sigue sirviendo a Jehová. Parece que vienen a nuestra asamblea en tres semanas. Veremos lo que pasa.

Cabe mencionar que el mismo fue abusado por un vecino, por seis años desde cuando tenía 6 o 7 años de edad. Después como a los doce o trece años de edad, otros jóvenes de su edad y más grandes abusaron de él. Él llegó a pensar que esa conducta, de actos homosexuales, era normal. Después aprendió la verdad y se bautizó cuando tenía como 15 años. Por dos años no participó en inmoralidad. Baloncesto, abusó de un niño. Y de allí en adelante no pudo desecher esos pensamientos y deseos. En 1986 se formó un comité judicial debido a la acusación de conducta impropia con un niño. Él fue censurado, pero no expulsado. Poco después en 1989 o 1990 fue nombrado siervo ministerial. Después fue nombrado anciano. Abusó de niños durante su tiempo de ser anciano. Finalmente, la madre de una de las víctimas que se mudó a Arizona, informó a los ancianos. Él fue expulsado en junio de 1995.

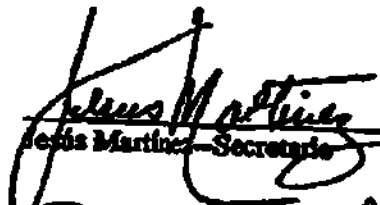
En nuestra reunión con él en marzo de este año, él dijo que estaba muy arrepentido por lo que hizo. Declaró que quería regresar a Jehová. Está dispuesto a enfrentarse a las víctimas y pedir su perdón. Ahora quiere obedecer a Jehová. Antes, cuando hablaba desde la plataforma no meditaba en lo que hacía. Aunque necesitaba confiar, le daba vergüenza y tenía temor del hombre. Se engañaba a sí mismo pensando que podía seguir sirviendo como anciano. Ahora se da cuenta que no podía cambiar sin ayuda. Desde su expulsión no ha vuelto a abusar de nadie. Ha leído artículos de las publicaciones con respecto a su pecado. Dice que no ve y ni lee información pornográfica. Declaró que desde su expulsión ha trabajado en tener una relación con Jehová y la expulsión le ha servido para fortalecerse espiritualmente. Él no falta a las reuniones, y hasta hace apuntes del programa. También ha dicho que él está dispuesto a seguir aceptando la disciplina de Jehová.

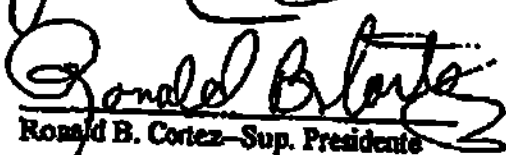
Con este cuadro en mente, tenemos algunas preguntas. Del comité original, sólo el hermano Jesús Martínez todavía es anciano en nuestra congregación. Antes de reunirnos con Gonzalo Campos en marzo, nos reunimos con otros dos miembros del comité original, Kevin Phillips y Eduardo Chávez que ahora son ancianos en otras congregaciones. Les hicimos preguntas para tener un cuadro completo y nos dieron sus observaciones. En vista de la seriedad del caso, ¿sería prudente y permisible incluirlos en el comité para considerar su restablecimiento? ¿Es necesario o está a nuestra discreción? En la página 114 del ks91S pregunta si como obra de arrepentimiento "¿...ha pedido perdón a

las personas ofendidas...las que sufrieron daño debido a su proceder pecaminoso? " ¿Es esencial que lo haga? ¿Deberíamos animarle que lo haga, aunque sea por teléfono? También, al considerar este caso con el superintendente de circuito, el piensa pero no está seguro, que la ley del estado de California ha cambiado y que ahora exige que ministros informen a las autoridades de los que han cometido abuso de menores. ¿Es cierto o no? No sabemos. En la página 129 la S1S dice "El arrepentimiento sincero y un apartarse del proceder incorrecto--no la actitud de otros ni el que haya pasado cierto tiempo--son los factores principales..." Sin embargo, en vista de la gravedad de lo cometido, ¿sería prudente hablar hasta por teléfono con la hermana [redacted] y [redacted]? Y cuando se restablece a cualquier persona, ¿se anuncian las restricciones impuestas como indica el libro *Nuestro Ministerio* en la página 149? ¿Cuál es la idea tras este procedimiento? Sabemos que cuando Gonzalo Campos sea restablecido, en este sistema no podrá ser anciano ni diervo ministerial ni precarior. Pero también, ¿excluye estrictamente ayudar con sonido, pesar micrófonos, ser acomodador, etc.? ¿Qué pautas guidoras hay al respecto? Con gusto aceptamos sus respuestas a nuestras preguntas y cualesquier otras instrucciones que nos quieran dar.

Muchas gracias por su ayuda.

Sus hermanos,
Comité de servicio


Jesús Martínez--Secretario


Ronald B. Cortez--Sup. Presidente


Juan Guardado--Sup. de servicio

Playa Pacifica Spanish Congregation
San Diego, California
3147 Clairemont Drive #4, San Diego, CA 92117-6434

SFH AUG 02 1999

July 24, 1999

Service Department
Watchtower Bible and Tract Society
of New York, Inc.
100 Watchtower Drive
Patterson, NY 12563-4204

Dear Brothers;

We are writing regarding the case of Gonzalo Campos. He was disfellowshipped on June 9, 1995 for abusing of minors. He has requested reinstatement three times. The last time was in January of this year. Also, we have in hand your letter dated SDG:SSE January 7, 1997. In view of the seriousness of the matter, and at the same time the time that has passed since his disfellowshipping, we would like to ask some questions. But, first we provide you the full picture in accord with the instructions in the March 14, 1997 letter addresses to "All bodies of elders."

The last time he committed the sin was in the spring of 1995, when he was 25 or 26 years old. His victims were between 6 to 8 years of age when he started to abuse them. He practiced this sin for a long time. In accord with the explanation of the February 1, 1997, Watchtower, page 29, we understand that he sexually abused seven children (six male and one female).

. Did we correctly understand the explanation of The Watchtower? Is genital touching considered sexual abuse?

The community does not know of all this and there was no publicity about this. Everything took place in the congregation and because of that he was not prosecuted. The victim's families know what happened and many members of our congregation and from the Linda Vista congregation know about it. He attended Linda Vista before. None of the victim or their family members families have moved out of state. A family moved from the congregation and is inactive, he abused the of that family. The victims are very disgusted with him. One of the female victims even came a year or two ago to supposedly kill him. But she did not find him. Without a doubt some brothers who know about this are still disgusted with him. Due to the great damage that he caused and the betrayal of his appointment as overseer, two elders of the original committee Brothers Kevin Phillips and Jesus Martinez have serious reservations about his reinstatement. Especially since he did not confess everything the first time. One year later when he requested reinstatement for the first time he confessed that he had abused

. The third brother Eduardo Chavez understands the seriousness of the matter but at

the same time that four years of being disfellowshipped is sufficient. At the same time, some brothers from both congregations believe that it is now sufficient time that he has been disfellowshipped.

On June 27, Brother Eduardo Chavez, elder in Linda Vista and Ronald Cortez of Playa Pacifica spoke to one of the victims. is still very hurt and feels for what happened. cried as she spoke about this. is very affected because it has affected very much, (the mother of one victim), is especially disappointed with Gonzalo because he was an elder and trusted him with the care of . At times has had the urge to call the police, take them to Gonzalo and denounce him. However, even though is very hurt, is willing to accept that Jehovah forgive him and reinstate Gonzalo. is willing to accept a personal apology from Gonzalo. At the same time, that is a victim do not want anything to do with the truth. Both are bitter and angry with Gonzalo. They have even expressed the wish to cause him harm. is hurt but continues to server Jehovah. It appears that they will be at our assembly in three weeks. We will see what happens.

It is worth mentioning that he himself was abused by a neighbor, for six years since he was six or seven years old. Afterward, at about twelve or thirteen years of age, other youths his age and older abused of him. He started to believe that this conduct, of homosexual acts, was normal. Later he learned the truth and was baptized when he was 15 years old. For two years he did not participate in immorality. Then, he abused a . And from then on he could not dispel those thoughts and desires. In 1986 a judicial committee was formed due to the accusation of improper conduct with a . He was reprovved, but not disfellowshipped. A little later in 1989 or 1990 he was appointed a Ministerial Servant. Later he was appointed an elder. He abused children during his time as an elder. Finally, , informed the elders. He was disfellowshipped in 1995.

During our meeting with him in March of this year, he mentioned that he was very repentant for what he did. He stated that he wanted to return to Jehovah. He is willing to face his victims and ask for forgiveness. He now wants to obey Jehovah. Before, when he spoke from the platform he would not meditate on what he was doing. Although he needed to confess, he was embarrassed and feared man. He was fooling himself thinking he could continue to serve as an elder. Now he is aware that he could not change without help. Since his disfellowshipping he has not abused of anyone. He has read article from the publications regarding his sin. He says he does not watched nor read pornographic material. He stated that since his disfellowshipping he has worked on having a relationship with Jehovah and the disfellowshipping has helped fortify him spiritually. He does not miss any meetings, and even takes notes of the program. Also, he has stated that he is willing to continue accepting the discipline from Jehovah.

With this picture in mind, we have a few questions. From the original committee, just Brother Jesus Martinez is still an elder in our congregation. Before we met with Gonzalo Campos in March, we met with two other members of the original committee, Kevin Phillips and Eduardo Chavez who are now elders in other congregations. We asked them question in order to have a complete picture and they provided us with their observations.

In view of the seriousness of the case, would it be prudent and permissible to include them in the committee to consider his reinstatement? Is it necessary or is it up to our discretion? On page 114 of Ks91S it asks that as an act of repentance "...has he asked forgiveness from the offended persons... those who suffered harm due to his sinful ways?" Is it essential that he do that? Should we encourage him to do it, even if over the phone? Also, as we consider this case with the circuit overseer, he thinks, but is not sure, that the law in the state of California has changed and now requires that ministers inform the authorities about those who have committed child abuse. Is this true? We do not know. On page 129 Ks91S it says "sincere repentance and leaving a wrong path- not the attitude of others nor the fact a certain amount of time has passed- are the principle factors..." However, in view of the gravity of what happened, would it be prudent to talk even by phone with

? And when any person is reinstated, are the restrictions imposed announced as is mentioned on page 149 of Our Ministry book? What is the idea behind this process? We know that when Gonzalo Campos is reinstated, in this system he could not be an elder nor ministerial servant nor pioneer. But also, does this strictly exclude him from helping with the sound, passing microphones, be an attendant, etc.? What guidelines are there in this regard? With pleasure we accept your reply to our questions and whatever other instructions you would like to give us.

Thank you very much for your help.

Your brothers,
Service Committee

{Signature}
Jesus Martinez - Secretary

{Signature}
Juan Guardado - Service Overseer

{Signature}
Ronald B. Cortez - Presiding Overseer

EXHIBIT 23

Do Not Destroy

SFG:SPH 5 de junio de 2000

SFA JUN 6 2000

**CUERPO DE ANCIANOS
CONGREGACIÓN PLAYA PACIFICA SPANISH
DE LOS TESTIGOS DE JEHOVÁ, SAN DIEGO, CA
C/O RONALD B CORTEZ
3147 CLAIREMONT DR APT 4
SAN DIEGO CA 92117-6434**

Estimados hermanos:

Tenemos ante nosotros la tarjeta S-79b-S en la que nos indican que Gonzalo Campos ha sido restablecido. A continuación les proporcionamos nuestros comentarios para su información.

Con buena razón, *La Atalaya* del 1 de enero de 1997 dice en la página 29: "Un cristiano adulto dedicado que cae en el pecado de abusar sexualmente de un menor demuestra una debilidad carnal anormal. La experiencia muestra que esos adultos probablemente abusan de otros niños. Es cierto que no todos los que abusan de un menor vuelven a cometer ese pecado, pero muchos lo hacen. Y la congregación no puede leer el corazón para decir quién probablemente abusará de un niño de nuevo y quién no. (Jeremías 17:9.) Por lo tanto, el consejo de Pablo a Timoteo es aplicable con especial fuerza en el caso de los adultos bautizados que hayan abusado de menores: 'Nunca impongas las manos apocautamente a ningún hombre; ni seas partícipe de los pecados ajenos'. (1 Timoteo 5:22.) Para la protección de nuestros hijos, un hombre que haya abusado de menores no lleva los requisitos para ocupar una posición de responsabilidad en la congregación". Por consiguiente, para el bien de la congregación y sus miembros, ni a la congregación local ni a la Sociedad se le deberá ver como una entidad que ha delegado autoridad o posición a una persona que es conocida como alguien que ha abusado deshonestamente de un menor.

Después de haber analizado cuidadosamente y con oración todos los factores del caso del hermano Campos, opinamos que lo susodicho aplica a él. Por consiguiente, no se le debe extender ninguna responsabilidad en particular en la congregación que pudiera interpretarse como una tarea asignada, prescindiendo de lo pequeña que pudiera parecer la asignación. No se le debe usar para atender las cuentas, la literatura, las revistas, las suscripciones ni los territorios. Tampoco se le utilizaría como acomodador ni operador del sonido, ni para pasar los micrófonos, representar a la congregación en oración, ni presentar los anuncios en la Reunión de Servicio. No sería aconsejable utilizar su hogar como un encuentro para el Estudio del Libro. No puede ser lector para el Estudio del Libro de Congregación ni el Estudio de *La Atalaya*, ni debe dirigir ninguna reunión para el servicio del campo. Tampoco cualifica como precursor auxiliar ni regular. Aunque pudiera ofrecerse para ayudar con el mantenimiento general del Salón del Reino al que asiste, no se le aprobaría para trabajar en otros Salones del Reino o Salones de Asamblea. Puede dar discursos estudiantiles en la Escuela del Ministerio Teocrático y participar en partes de la Reunión de Servicio que no impliquen enseñanza, con tal de que esto no ofenda a aquellos de la congregación que sepan de su pasado.

Sírvanse tener presente las siguientes instrucciones que se presentaron en la carta confidencial de la Sociedad dirigida A TODOS LOS CUERPOS DE ANCIANOS con fecha del 14 de marzo de 1997, referente a los que son conocidos como personas que han abusado de un menor, a saber: "Toda persona que haya manifestado debilidad en este campo debería ser muy consciente de que necesita privarse de estar a solas con un niño. Deberá abstenerse de abrazar o cargar en brazos a los niños, o de tener otras manifestaciones de cariño con ellos. Convendrá que los ancianos adviertan bondadosamente a cualquiera que vta haciendo algo que pueda resultar en una tentación o en causa de preocupación para otros miembros de la congregación. (1 Cor. 10:12, 32)". Esto incluiría no permitir que niños (aparte de sus hijos) pasen la noche en su casa, no salir al servicio del campo acompañado de un niño o una niña, no cultivar relaciones amistosas con niños, y así por el estilo.

Después de que haya pasado otra cantidad de años, quizás se pregunten si se le pueden extender ciertos privilegios a este hermano. Si ha continuado haciéndose para sí un buen registro, si no hay quejas de parte de su(s) víctima(s) ni de los familiares de esta(s) y si el cuerpo de ancianos concurre que no será fuente de crítica el que se le concedan otros privilegios menores en la congregación, entonces ustedes pueden escribir a la Sociedad expresando sus observaciones y recomendaciones sobre cómo piensan que podría utilizarse en la congregación. Expliquen con claridad cómo se siente(n) en estos momentos la(s) víctima(s) y sus parientes, y cómo lo ve la congregación ahora. Deben esperar hasta recibir instrucciones de la Sociedad antes de extenderle ciertos privilegios.

Esperamos que lo antedicho les resulte útil en los días venideros a fin de que sean "como escondite contra el viento y escondrijo contra la tempestad de lluvia, como corrientes de agua en un país árido" para el rebaño bajo su cuidado (Isaías 32:2; 1 Pedro 5:2). Por favor reciban una expresión de amor cristiano y nuestros mejores deseos.

Sus hermanos,

Do Not Destroy

SFG:SFH June 5, 2000

SFA JUN 6 2000

BODY OF ELDER
PLAYA PACIFICA SPANISH CONGREGATION
OF JEHOVAH'S WITNESSES, SAN DIEGO, CA
C/O RONALD B CORTEZ
3147 CLAIRMONT DR APT 4
SAN DIEGO CA 92117-6434

Dear Brothers:

We have before us the S-79b-S card in which you inform us that Gonzalo Campos has been reinstated. We provide the following comments for your information.

With good reason, *The Watchtower* of January 1, 1997, mentions on page 29: "a dedicated adult Christian who falls into the sin of child sexual abuse reveals an unnatural fleshly weakness. Experience has shown that such an adult may well molest other children. True, not every child molester repeats the sin, but many do. And the congregation cannot read hearts to tell who is and who is not liable to molest children again. (Jeremiah 17:9) Hence, Paul's counsel to Timothy applies with special force in the case of baptized adults who have molested children: "Never lay your hands hastily upon any man; neither be a sharer in the sins of others." (1 Timothy 5:22) For the protection of our children, a man known to have been a child molester does not qualify for a responsible position in the congregation." Therefore, for the good of the congregation and its members, neither the local congregation nor the Society should be viewed as an entity which has delegated authority or position to a person who is known as someone who has molested a minor.

After having carefully analyzed and with prayer all the factors of the case of Brother Campos, our opinion is that the aforementioned applies to him. Therefore, he should not be given any particular congregation responsibility that could be interpreted as an assigned task, regardless of how small the task may seem. He should not be used to care for the accounts, literature, magazines, subscriptions nor territories. Neither will he be used as an attendant, nor sound operator, or to pass microphones, represent the congregation in prayer, or give announcements in the Service Meeting. It is not recommended to use his home as a Book Study location. He cannot be reader for the Congregation Book Study or the Watchtower Study, nor should he direct any meeting for field service. He does not qualify to be an auxiliary or regular pioneer. Although he may offer to work with the general maintenance of the Kingdom Hall where he attends, he is not approved to work on other Kingdom Hall or Assembly Halls. He may give student talks in the Theocratic Ministry School and participate in the Service Meeting where teaching is not implied, so long as this does not offend those in the congregation who know about his past.

PLAYA PACIFICA SPANISH CONGREGATION, SAN DIEGO, CA
JUNE 5, 2000
PAGE 2

Keep in mind the following instructions that were presented in the Society's confidential directed to ALL BODIES OF ELDERS dated March 14, 1997, regarding those who are known as child molesters, namely: "All persons who have manifested a weakness in this area should be conscience of the need to stay away from being alone with children. They should not hug or carry children in their arms, or manifest other affection with them. It would be good for the elders to kindly advise any who they see doing anything that could result in a temptation or cause of precaution for any other members of the congregation. (1 Cor 10:12, 32.)". This includes no permitting children (apart from his children) stay the night on their home, go out in field service accompanied by a male or female child, not cultivate friendly relationships with children, and other similar things.

After another few years have passed, you might ask if certain privileges could be granted to this brother. If he has continued keeping a good report, if there is no outcry from his victim(s) nor their family and if the body of elders conclude that it would not be a source of criticism if he were to be given other minor privileges in the congregation, then you could write the Society expressing you observations and recommendations about how you think he could be utilized in the congregation. Clearly explain how the victim(s) fell at this time, and their family, and how the congregation views him now. You should wait to receive instructions from the Society before extending to him certain privileges.

We hope that the aforementioned results useful to you in the coming days so you may be "like a hiding place from the wind and a place of concealment from the rainstorm, like streams of water in a waterless country" for those under you care(Isa 32 2; 1 Peter 5:2). Please receive an expression of our Christian love and out best wishes.

Your brothers
{Signature}

EXHIBIT 24

DO NOT DESTROY
NOTIFICACIÓN DE EXPULSIÓN O DESASOCIACIÓN
 (Sirvanse escribir toda la información a máquina o con letra de molde y tinta.)

JUN 28 1995

Playa Pacifica San Diego CA 98806
 Nombre de congregación Ciudad Estado Número de congregación
Gonzalo Campos
 Nombre de la persona expulsada o desasociada
9 de Junio, 1995 21/ABR/00
 Fecha del anuncio de expulsión o desasociación Fecha de restablecimiento

Marquen los encasillados correspondientes, si aplican: ☒ Anciano ☐ Siervo ministerial ☐ Precursor regular o especial
☐ Alstado con la Sociedad como la persona que recibe la literatura o las revistas (Sirvanse enviar el nombre y la dirección nuevos.)

DO NOT DESTROY

Ofensa(s) por la(s) cual(es) se expulsó a la persona (si ella se desasoció, indiquen la razón):

Sirvanse proporcionar un resumen breve, pero completo, del asunto: 1) ¿Qué condujo a la comisión del mal? 2) ¿Se había aconsejado o censurado anteriormente a la persona? 3) ¿Qué factores, incluso la falta de obras propias de arrepentimiento, los llevaron a tomar su decisión? (Vean el punto núm. 3 al dorso.) (Usen una hoja adicional si necesitan más espacio.)

¿Qué evidencia se presentó del mal, tal como una confesión, dos o más testigos, etc.?

Firmas de los ancianos que sirvieron en el comité. (Escriban los nombres en letra de molde o a máquina debajo de las líneas. Firman en las líneas.) (Si se trata de una desasociación, el comité seleccionado para tratar el caso debe firmar.)

Edwardo Chavez Florentino Garcia
Jesus Martinez Kevin Phillips

¿Aplicó la persona de la decisión de ustedes? No Si es así, debe llenarse este formulario y entregarse al que preside el comité de apelación, quien lo enviará a la Sociedad con una carta del comité de apelación. Si el comité original quiere añadir más comentarios, debe ponerlos por escrito y dárselos al comité de apelación para que éste los envíe a la Sociedad.

Si la persona había sido expulsado se había desasociado anteriormente, indiquen: 1. Fecha _____
 2. Nombre de la persona entonces _____ 3. Fecha de restablecimiento _____
 4. Congregación que tomó la acción: _____
 Nombre de la congregación Ciudad Estado

NOTA: Envíen a la Sociedad el original de este formulario junto con las tarjetas S-79a-S y S-79b-S que ustedes han llenado. Retengan una copia de este formulario en los archivos confidenciales de la congregación. Después que la Sociedad reciba estos formularios, se les devolverá la tarjeta S-79b-S. Si se restablece a la persona (o ella muere), envíen a la Sociedad la tarjeta S-79b-S y anoten en su copia del formulario S-77-S la fecha de restablecimiento (o de la muerte).

(VEAN AL DORSO)
 W1000008

SEP 20 1995
 Impreso en E.U.A.

INSTRUCCIONES A SEGUIR PARA INFORMAR EXPULSIONES O DESASOCIACIONES

El comité judicial utilizará las tarjetas S-79a-S y S-79b-S y los formularios S-77-S para suministrar información a la Sociedad cuando manejen casos de expulsión. Cuando una persona se desasocia, se nombrará un comité para tratar el asunto, y el comité debe emplear estos mismos formularios para informar a la Sociedad. Se utilizarán los formularios y los sobres azules especiales de la siguiente manera:

Notificación de Expulsión o Desasociación (S-77-S): Llenen el original y una copia al carbón. Retengan la copia al carbón en los archivos confidenciales de la congregación y envíen el original a la Sociedad en el sobre azul especial.

Registro de Expulsión o Desasociación (S-79a-S y S-79b-S): Llenen los originales de cada una de estas tarjetas. Deben enviarse a la Sociedad ambas tarjetas, la S-79a-S y la S-79b-S, junto con el formulario S-77-S. Se retendrá en los archivos de la Sociedad la tarjeta S-79a-S. La Sociedad estampará en la tarjeta S-79b-S la fecha en que se hizo el registro y entonces la devolverá a la congregación. Una vez que la reciban de vuelta, pongan la tarjeta S-79b-S, junto con su copia del formulario S-77-S, en los archivos confidenciales de la congregación.

Si se restablece a la persona (o ella muere), el secretario debe poner en la tarjeta S-79b-S la fecha en que sucedió esto, firmarla y enviarla a la Sociedad en el sobre azul especial. También debe registrarse esta fecha en su copia del formulario S-77-S.

Sobres azules: Estos sobres azules especiales solo se usarán cuando se envíen a la Sociedad los formularios antes mencionados o cuando se envíe a la Sociedad correspondencia relacionada con asuntos judiciales. Sirvanse no usar los sobres azules para enviar cualquier otra correspondencia.

PUNTOS QUE SE DEBEN REPASAR CUANDO MANEJE CADA CASO

1. Los arreglos que tiene que hacer el cuerpo de ancianos para asignar a miembros capacitados para que sirvan en el comité judicial.
2. El procedimiento que debe seguir el comité judicial.
3. La información más reciente en cuanto a cómo identificar el arrepentimiento verdadero y las obras propias del arrepentimiento.
4. Las instrucciones sobre cómo encargarse de una apelación, en caso de que se apele de la expulsión.

DO NOT DESTROY
NOTIFICATION OF EXPULSION OR DISASSOCIATION
(Please write all information on typewriter or print in ink.)

JUNE 23, 1995

Playa Pacifica San Diego CA 98806
Name of Congregation City State Number of Congregation

Gonzalo Campos June 9, 1995 21/APR/00
Name of person expelled or disassociated Date of announcement Date of
expulsion or reestablishment
disassociation

Mark the corresponding boxes, if applicable: (X) Elder () Ministerial servant () Regular or
special precursor () Listed with the Society as a
person that receives literature or magazines
(Please send new name and address.)

DO NOT DESTROY

Offense(s) for which the person was expelled (if the person disassociated on his/her own, indicate the reason):

Please provide a brief summary, but complete, of the matter: 1) What led to the commission of the bad act
2) Had the person been advised or censured previously? 3) What factors, including the lack of proper acts
of repentance, led the person to that decision? (See point number 3 in back.) (Use additional page if you
need more space.)

What evidence was presented of the bad act, such as a confession, two or more witnesses, etc.?

Signatures of the elders who served in the committee. (Print or typewrite the names under the line. Sign
on the line. (If this is a disassociation, the committee selected to deal with the case must sign.)

(Signature)

Eduardo Chavez

(Signature)

Jesus Martinez

(Signature)

Florentino Garcia

(Signature)

Kevin Phillips

Did the person appeal your decision? No If so, this form must be filled out and handed to the
appeals committee president, who shall send it to the Society with a letter of the appeals committee. If
the original committee wants to add more comments, it must do so in writing and give them to the appeals
committee so that it may send them to the Society.

If the person had been expelled or had disassociated himself/herself previously, indicate:

1. Date _____
2. Name of the person at that time _____
3. Date of reestablishment _____
4. Congregation that took the action: _____

Name of the Congregation City State

NOTE: Send the original of this form to the Society along with cards S-79a-S and S-79b-S that you have
filled out. Retain a copy of this form in the confidential files of the congregation. After the Society
receives these forms, the card S-79b-S will be returned to you. If the person is reestablished (or if the
person dies), send a card S-79b-S to the Society and indicate in your copy of Form S-77-S the date of
reestablishment (or of death).

S-77-S 2/92

(SEE BACK)
W1000006

September 20, 1995
Printed in USA

INSTRUCTIONS TO FOLLOW TO INFORM REGARDING EXPULSIONS OR DISASSOCIATIONS

The judicial committee shall use the cards S-79a-S and S-79b-S and form S-77-S to provide information to the Society when managing expulsion cases. When a person disassociates himself/herself, a committee shall be named to deal with the matter, and the committee must use these same forms to inform the Society. The forms and the special blue envelope shall be used in the following manner:

Notification of expulsion or disassociation (S-77-S): Fill out the original and a carbon copy. Retain carbon copy in the confidential files of the congregation and send the original to the Society in the special blue envelope.

Registration of expulsion or disassociation (S-79a-S and S-79b-S): Fill out the originals of each of these cards. Both cards, S-79a-S and S-79b-S, must be sent to the Society, along with the form S-77-S. Card S-79-S shall be retained in the files of the Society. The society shall stamp on card S-79b-S the date on which the registration was made and then it shall return it to the congregation. Once you receive card S-79b-S, place it along with your copy of Form S-77-S in the confidential files of the congregation.

If the person is reestablished (or dies), the secretary must place on card S-79b-S, the date on which this happened, sign it and send it to the Society in the special blue envelope. This date must also be registered in your copy of form S-77-S.

Blue envelopes: These special blue envelopes shall only be used when sending the aforementioned forms to the Society or when sending to the Society correspondence related to judicial matters. Please do not use the blue envelopes to send any other correspondence.

POINTS THAT MUST BE REVIEWED WHEN HANDLING EACH CASE

1. The arrangements that the body of elders must make in order to assign brothers capable of serving in the judicial committee.
2. The procedure that the judicial committee must follow.
3. The most recent information regarding how to identify true repentance and acts proper of repentance.
4. The instructions regarding how to deal with an appeal, in case the expulsion is appealed.

EXHIBIT 25

1 IRWIN M. ZALKIN, ESQ. (#89957)
2 DEVIN M. STOREY, ESQ. (#234271)
3 MICHAEL J. KINSLOW, ESQ. (#238310)
4 The Zalkin Law Firm, P.C.
5 12555 High Bluff Drive, Suite 260
6 San Diego, CA 92130
7 Tel: 858-259-3011
8 Fax: 858-259-3015
9 Email: Irwin@zalkin.com
10 dms@zalkin.com
11 mipk@zalkin.co,
12 Attorney for Plaintiff

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO

10 John Dorman, Individually, and Joel
11 Gamboa, Individually,

12 Plaintiffs,

13 v.

14 Defendant Doe 1, La Jolla Church,
15 Defendant Doe 2, Linda Vista church, and
16 Defendant Doe 3, Supervisory
17 Organization, Defendant Doe 4,
18 Perpetrator, and Does 5 through 100,
19 inclusive,

20 Defendants.

) Case No: 37-2010-00092450-CU-PO-
) CTL

) **DECLARATION OF JOEL
) GAMBOA IN SUPPORT OF
) PLAINTIFFS OPPOSITION TO
) DEFENDANTS' MOTIONS FOR
) SUMMARY JUDGMENT**

) **Date: 12-16-11
) Time: 10:30 a.m.
) Dept C-73
) Judge: Steven R. Denton
) Trial: 1-27-12**

21 I, Joel Gamboa, declare as follows:

22 1. I was born on December 31, 1980. I am a Plaintiff in the above-captioned legal action.

23 From my birth, until I moved to Phoenix, Arizona in approximately January of 1995, I
24 was associated with the Linda Vista Spanish Congregation of Jehovah's Witnesses.

25 2. I was sexually abused on many occasions by Gonzalo Campos when I was a very young
26 minor. The abuse ended when I moved to Phoenix. Later in 1995, I was contacted by
27
28

1 Elders associated with the Jehovah's Witness Religion, and asked if I had been abused
2 by Gonzalo. I told them that I had been.

3 3. In September of 2009, even though I had informed the Elders of the sexual abuse by
4 Gonzalo, I learned that Gonzalo Campos was still a Jehovah's Witness and was allowed
5 to participate in his congregation in San Diego. Because of what Gonzalo Campos had
6 done to me, I was upset and disturbed when I learned that Campos was able to
7 participate in the Church.
8

9 4. My son was born on July 9, 2007. As he began to grow older, in 2008 or 2009, I
10 realized that I was over protective of him.
11

12 5. I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct to the best of my knowledge and belief.

14 Executed this 1, day of December, 2011, at Phoenix, Arizona.

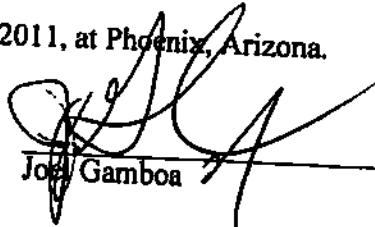
15
16 
17 Joel Gamboa
18
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EXHIBIT 26

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

ORIGINAL

JOHN DORMAN, individually; and)
JOEL GAMBOA, individually,)

Plaintiffs,)

vs.)

CASE NO. 37-2010-00092450
-CU-PO-CTL

DEFENDANT DOE 1, LA JOLLA CHURCH;)
DEFENDANT DOE 2, LINDA VISTA)
CHURCH; DEFENDANT DOE 3,)
SUPERVISORY ORGANIZATION;)
DEFENDANT DOE 4, PERPETRATOR; and)
DOES 5 through 100,)

Defendants.)

DEPOSITION OF

JOEL GAMBOA

SAN DIEGO, CALIFORNIA

FEBRUARY 3, 2011

ATKINSON-BAKER, INC.
COURT REPORTERS
1-800-288-3376
www.depo.com

REPORTED BY: RUTH N. VALDIVIA, CSR NO. 11752, RPR

FILE NO.: A501227

1 A. No.

2 Q. Do you know what field service is?

3 A. Yes.

4 Q. Did you participate in that?

5 A. Yes.

6 Q. Just accompanying your mother or did you do it on

7 your own?

8 A. No. I would go with my mother and sometimes on my

9 own.

10 Q. How old were you when you stopped doing that?

11 A. I was like 15 years, 16.

12 Q. How did you first meet Gonzalo Campos?

13 A. It was through church.

14 Q. Through Kingdom Hall?

15 A. Through the Kingdom Hall, yes.

16 Q. How did you meet him?

17 A. I don't recall.

18 Q. Do you know how old you were when you first met

19 him?

20 A. I was eight, eight or nine years old.

21 Q. Did he attend the same meetings at the Kingdom

22 Hall that you and your mother attended?

23 A. No.

24 Q. Do you recall how you first met him?

25 A. I don't.

1 Q. Or where you first met him?
2 A. Where I first met him?
3 Q. Yes.
4 A. It was Kingdom Hall.
5 Q. On Linda Vista Road?
6 A. Yes.
7 Q. Did Gonzalo Campos ever have Bible study sessions
8 with you?
9 A. Yes.
10 Q. And how were those arranged? Who arranged that?
11 A. I guess he did and asked if I wanted to, and I
12 said sure.
13 Q. Okay. Do you recall how old you were when you had
14 Bible study with him?
15 A. Eight or nine.
16 Q. And where would these Bible studies take place?
17 A. My house.
18 Q. Did your mother encourage you to have those
19 studies?
20 A. Yes.
21 Q. Over what period of time did you have Bible study
22 sessions with Gonzalo Campos? Starting at age eight or
23 nine, how long did it last?
24 A. Oh, about six years, till the time I left Phoenix.
25 Q. You left Phoenix at age 14?

1 A. Yes.

2 Q. I'm going to get into the area that I don't want
3 to get into but we need to.

4 When is the first time that Gonzalo Campos did
5 anything sexually to you, any type of abuse?

6 A. During Bible study.

7 Q. In Bible study.

8 Do you recall how old you were?

9 A. Eight or nine.

10 Q. What did he do on the first occasion?

11 A. He touched my genitals.

12 Q. And this was in your home?

13 A. Yes.

14 Q. Did he do anything else on that first occasion?

15 A. No.

16 Q. And where -- was it under your clothing or were
17 you unclothed?

18 A. Under my clothing.

19 Q. How long did it last?

20 A. He would do it while we were doing the prayer.
21 It's like three minutes, two to three minutes.

22 Q. Do you recall the first occasion that this
23 happened specifically?

24 A. Not -- not specifically, no.

25 Q. It's just kind of a general recollection, that's

1 what he would do?

2 A. Yes.

3 Q. How many times did he do that while he was doing

4 prayer?

5 A. Every time he would give us Bible study, which is

6 once a week.

7 Q. "Once a week."

8 And did you say "give us Bible study"? Was it

9 more than --

10 A. No. I meant me and him.

11 Q. You and him?

12 A. Yes.

13 Q. Okay. Thank you.

14 Did there come a point in time when his sexual

15 abuse of you escalated to more than just fondling during

16 prayer?

17 A. Yes.

18 Q. When did that first take place?

19 A. He would come pick me up from school.

20 Q. And where were you going to school at the time?

21 A. Kit Carson Elementary.

22 Q. "Kit Carson."

23 What would happen then when he'd pick you up from

24 school?

25 A. He just picked me up and just took me to like

1 parking lots, took me to his home.

2 Q. Do you recall the first occasion he took you to

3 his home?

4 A. I don't.

5 Q. How about the first occasion he took you to a

6 parking lot?

7 A. I don't recall.

8 Q. What kind of vehicle did he have?

9 A. I know he had a grey Nissan Sentra, or silver.

10 And he drove a van.

11 Q. What did Gonzalo Campos do for a living, do you

12 know?

13 A. I think he did like landscaping, gardener.

14 Q. Was the van kind of like a work van?

15 A. I don't recall.

16 Q. When you were sexually abused, would he pick you

17 up with the Nissan or the van or would it be either one?

18 A. Either one.

19 Q. What happened when he would take you to a parking

20 lot?

21 A. He would take his pants off and mine and just

22 fondle me, and then he fondled himself.

23 Q. Anything else in the parking lot?

24 A. He would have oral sex on me.

25 Q. He'd performed it on you?

1 A. Yes.

2 Q. Did he make you perform it on him?

3 A. No.

4 Q. And do you recall anything else taking place when

5 you were taken to a parking lot?

6 A. He would try -- he put his finger in my anal and

7 tried to penetrate me.

8 Q. With his penis?

9 A. Yes.

10 Q. Would this be in the daytime?

11 A. Yes.

12 Q. Do you recall specifically where in the parking

13 lot that he took you to?

14 A. Yes.

15 Q. Which one?

16 A. It was a parking lot by Tio Leo's Restaurant, the

17 Fashion Valley mall.

18 Q. Where is the Tio Leo's located, do you know?

19 A. I know it's going down Linda Vista Road, like

20 going towards Old Town and it's to the right, I think, of

21 Balboa. I'm not sure what it is.

22 Q. Balboa and Moreno?

23 A. Yeah.

24 Q. Moreno Boulevard?

25 A. Yeah, Moreno Boulevard, that's what it is.

1 Q. And how often would he pick you up from school?
2 A. Like once or twice a week.
3 Q. And every time he'd pick you up from school he
4 would abuse you in some form sexually?
5 A. Yes.
6 Q. During any of the abuse in the parking lot, did
7 you ever suffer any physical injury or have any bleeding
8 episodes or anything like that?
9 A. Not that I recall.
10 Q. What about, do you recall the first time he took
11 you to his home?
12 A. I don't recall, no.
13 Q. How many times did he take you to his home?
14 A. Like twice.
15 Q. "Twice."
16 Where did he live, do you recall?
17 A. In Clairmont.
18 Q. What happened the first time he took you to his
19 home?
20 A. He tried to penetrate me again on his bed and kind
21 of hugged me like -- like side to side.
22 Q. Anything else on this first occasion at his home?
23 A. Just oral. Oral -- he had sex on me also.
24 Q. He would performed oral sex on you?
25 A. Yes, he would.

1 Q. Did he make you touch him, anything like that?
2 A. Yes.
3 MR. STOREY: You okay?
4 MR. McCABE: You need to take a break, it's fine.
5 THE WITNESS: Yeah, let me take a break.
6 MR. McCABE: Okay.
7 (A recess was taken.)
8 BY MR. McCABE:
9 Q. Is your mother one of Jehovah's Witnesses?
10 A. Yes.
11 Q. Does she still attend meetings?
12 A. Yes.
13 Q. Do you know what congregation she attends?
14 A. En Canto.
15 Q. "En Canto"?
16 A. Um-hum.
17 Q. In Phoenix?
18 A. Yes.
19 Q. And I take it En Canto Spanish?
20 A. Yes.
21 Q. And do any of your brothers and sister attend
22 meetings of Jehovah Witnesses?
23 A. No.
24 Q. How about your grandmother?
25 A. Yes.

1 Q. Have you always recalled that this abuse took
2 place to you? In other words, there's not a period of time
3 where you blocked it out and didn't know what happened?

4 A. No, I've always known.

5 Q. Do you currently use alcohol?

6 A. Sometimes, yeah.

7 Q. How would you describe your use of alcohol, what
8 do you drink?

9 A. Beer.

10 Q. Anything else?

11 A. No.

12 Q. How frequently do you drink beer?

13 A. Just sporting events, family events.

14 Q. Ever had a problem with drinking alcohol?

15 A. No.

16 Q. How about recreational drugs, did you use
17 recreational drugs in the past?

18 A. In the past, yes.

19 Q. Currently?

20 A. No.

21 Q. What did you use in the past?

22 A. Marijuana.

23 Q. Anything besides marijuana?

24 A. I've done cocaine.

25 Q. How often would you say you've done cocaine?

1 A. Not a whole lot. Like spreads like parties, stuff
2 like that, not like abuse or --

3 Q. Sporadic use if it was available?

4 A. Yes.

5 Q. How long a time period did you use marijuana?

6 A. Like a year.

7 Q. How old were you?

8 A. Seventeen, 18.

9 Q. And you stopped using it after that year?

10 A. Yes.

11 Q. When did you voluntarily become sexually active?

12 A. You mean like a partner?

13 Q. Yes.

14 A. When I was 18.

15 Q. Is that a female partner?

16 A. Yes.

17 Q. Have you had any voluntary homosexual partners?

18 A. No.

19 Q. How many sexual partners have you voluntarily had
20 in your life?

21 A. Like nine or ten.

22 Q. I know I asked you a little bit about this, but
23 did you suffer any sexual abuse from anybody else besides
24 Gonzalo Campos?

25 A. No.

1 A. No.

2 Q. After that first phone call, did anybody from

3 La Jolla Spanish ever call you back?

4 A. No.

5 Q. Can you tell me what you've experienced as a

6 result of the abuse that you've suffered at the hands of

7 Gonzalo Campos? How do you feel about it today?

8 A. Depressed, insecure, I don't trust anybody, low

9 self-esteem.

10 Q. Have you ever had suicidal thoughts?

11 A. No.

12 Q. Does it affect your relationship with women?

13 A. No.

14 Q. How about with your children?

15 A. I'm just really overprotective of them.

16 Q. Have you thought about getting counseling for

17 depression and your feelings of low self-esteem?

18 A. No.

19 Q. Do you have any intention of getting counseling

20 for that in the future?

21 A. I hope so.

22 Q. Is anything stopping you from getting it now?

23 A. No. I guess I'm afraid to talk to somebody.

24 Q. Yeah.

25 Sir, do you think you were ever attending the same

1 congregation that Gonzalo Campos attended, or was it always
2 different congregations?

3 A. I've just been to the one in Linda Vista.

4 Q. And he was in the La Jolla congregation?

5 A. From what I recall, yes.

6 Q. Okay. Do you know whether he was an elder
7 ministerial servant during the time you were in San Diego?

8 A. I knew he was. That's what he told me.

9 Q. Do you know if he was a pioneer or anything like
10 that?

11 A. I don't recall.

12 Q. You thought he was a ministerial servant?

13 A. Yeah.

14 Q. Do you recall when he told you that?

15 A. I don't.

16 MR. McCABE: Let's take a couple of minutes and
17 see if we can wrap this up really early.

18 MR. STOREY: Okay.

19 (A recess was taken.)

20 BY MR. McCABE:

21 Q. Would you like to add anything to your testimony,
22 to the question that I asked you about as to the sexual
23 abuse of Gonzalo Campos on you has affected your
24 relationship with women?

25 A. Yes.

1 Q. How has it affected your relationship with women?
2 A. I have premature ejaculation.
3 Q. Have you seen a doctor for that condition?
4 A. No.
5 Q. Have you thought about seeing a doctor for that
6 condition?
7 A. No.
8 Q. Would you like to see a doctor about that
9 condition?
10 A. Yes.
11 Q. Do you intend to see someone about that condition?
12 A. Yes, I'm willing to do that.
13 Q. Anything else you feel the abuse has affected your
14 relationship with women?
15 A. That's it.
16 Q. Do you recall Gonzalo Campos giving talks in the
17 Linda Vista congregation to Jehovah Witnesses when you
18 attended?
19 A. I don't recall.
20 Q. You mentioned earlier that you stopped attending
21 meetings when you experienced a loss of faith. Was that
22 loss of faith based on not agreeing with the teaching of
23 Jehovah's Witnesses?
24 A. It's more like what happened to me.
25 Q. The abuse?

EXHIBIT 27

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7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN DIEGO**

10 John Dorman, Individually, and Joel
11 Gamboa, Individually,

12 Plaintiffs,

13 v.

14 Defendant Doe 1, La Jolla Church,
15 Defendant Doe 2, Linda Vista church, and
16 Defendant Doe 3, Supervisory
17 Organization, Defendant Doe 4,
Perpetrator, and Does 5 through 100,
inclusive,

18 Defendants.
19
20
21

) Case No: 37-2010-00092450-CU-PO-
) CTL

) **DECLARATION OF BERTHA**
) **GOMEZ SANDOVAL IN SUPPORT**
) **OF PLAINTIFFS OPPOSITION TO**
) **DEFENDANTS' MOTIONS FOR**
) **SUMMARY JUDGMENT**

) **Date: 12-16-11**
) **Time: 10:30 a.m.**
) **Dept C-73**
) **Judge: Steven R. Denton**
) **Trial: 1-27-12**
)

22 Yo, Bertha Gomez Sandoval, declare lo siguiente:

- 23 1. Yo no estoy segura en el ano en que yo naci, pero creo que naci en Junio 25, quisas en el
24 ano 1932 oh en el 1936.
- 25 2. Yo me hise miembro de la Congregacion de Linda Vista, de los Testigos de Jehovah in
26 1978. Mientras atendia la congregacion, yo conosi a Gonzalo Campos. No recuerdo el
27
28

1 ano que conosi a Gonzalo, pero si recuerdo que el tenia como unos 19 anos de edad
2 cundo lo conosi. Yo creo que fue entre 1982 y 1984.

3 3. Durante el tiempo que conosi a Gonzalo Campos, escuche un anuncio dicho en la junta
4 de la Congregacion de Linda Vista en Espanol que Gonzalo Campos servia como un
5 pionero en la congregacion. Pioneros son miembros de la congregacion que se
6 comprometen a dedicar un cierto numero de horas cada mes en sirviendo a la
7 congregacion.
8

9 4. Gonzalo fue muy active en la Congregacion de Linda Vista en Espanol. Yo lo vi ayudar
10 repartiendo literatura, saludando a la gente en las juntas y tambien en la limpieza del Salon
11 del Reino despues de los servicios. Yo estuve presente cuando Gonzalo Campos a veces
12 condujo las reunioness para servicios de campo y tambien predicaba puerta a puerta.
13

14 5. A mediados de 1980, la Congregacion de Linda Vista se dividio, y una nueva
15 congregacion se formo en La Jolla. Yo me quede en la Congregacion de Espanol en
16 Linda Vista despues que se dividio, y Gonzalo Campos se cambio en la Congregacion de
17 Espanol en La Jolla.

18 6. Despues que la nueva congregacion se formo Yo vi a Gonzalo a veces que venia a
19 visitar a la Congregacion en Espanol de Linda Vista y atendia las juntas ahi. Yo tambien
20 vi a Gonzalo que venia a nuestra casa para ensenar al estudio biblico a mi nieto Joel
21 Gamboa.
22

23 7. Yo declare bajo pena de perjurio bajo las leyes del Estado de California, que lo anterior
24 es verdadera a lo mejor de mi conocimiento y creencia.

25 Executado este 1 dia de Diciembre, 2011

26 
27 Bertha Gomez Sandoval

EXHIBIT 28

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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO

10 John Dorman, Individually, and Joel
11 Gamboa, Individually,

12 Plaintiffs,

13 v.

14 Defendant Doe 1, La Jolla Church,
15 Defendant Doe 2, Linda Vista church, and
16 Defendant Doe 3, Supervisory
17 Organization, Defendant Doe 4,
18 Perpetrator, and Does 5 through 100,
19 inclusive,

20 Defendants.

) Case No: 37-2010-00092450-CU-PO-
) CTL

) **DECLARATION OF ROBERT A.**
) **GEFFNER, PH.D. IN SUPPORT OF**
) **PLAINTIFFS' OPPOSITION TO**
) **DEFENDANTS' MOTIONS FOR**
) **SUMMARY JUDGMENT**

) **Date: 12-16-11**
) **Time: 10:30 a.m.**
) **Dept C-73**
) **Judge: Steven R. Denton**
) **Trial: 1-27-12**

21
22 I, Robert Geffner, Ph.D., ABN, ABPP, declare as follows:

23 I am both a licensed psychologist and a licensed marriage and family therapist. I
24 became licensed as a psychologist in the State of Texas in 1980. I later became licensed as a
25 psychologist in the State of California in 1999.

26 I directed a full service private mental health clinic in East Texas for more than 15 years
27 prior to my relocation to California in 1999. In this capacity, I supervised and directed 13
28

1
2 **DECLARATION OF ROBERT A. GEFFNER, PH.D. IN SUPPORT OF PLAINTIFFS**
3 **OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

1 mental health professionals, including psychiatrists, psychologists, psychological associates,
2 social workers, marriage and family therapists, and counselors. I regularly conducted
3 evaluations for the courts, did evaluations of child abuse and domestic violence cases for courts
4 and Child Protective Services (CPS), as well as for other referral agencies. I conducted
5 evaluation and treatment programs for both victims and offenders of child abuse and intimate
6 partner violence. I also provided counseling and mediation to families involved in custody
7 disputes or child maltreatment, and regularly conducted psychological and parenting
8 evaluations.
9

10 I have trained mental health professionals, judges, attorneys, and others concerning
11 appropriate procedures to use in these types of evaluations for over 25 years.
12

13 For 16 years, I served as a professor of psychology at University of Texas – Tyler. I am
14 the President and Founder of a nonprofit international resource and training center (the Family
15 Violence & Sexual Assault Institute in Texas and now in California). I am the Founding
16 President of the Institute on Violence, Abuse and Trauma at Alliant International University. I
17 serve as a Clinical Research Professor of Psychology at the California School of Professional
18 Psychology, Alliant International University in San Diego. I am the editor of four professional
19 journals (including the *Journal of Child Sexual Abuse* and the recent *Journal of Child &*
20 *Adolescent Trauma*). I have also served as an adjunct faculty member for the National Judicial
21 College in Reno, Nevada for 10 years.
22

23 I hold a Diplomate in Clinical Neuropsychology from the American Board of
24 Professional Neuropsychology, and I am Board Certified in Family Psychology from the
25 American Board of Professional Psychology.
26

27 In addition to teaching, I have maintained an active practice in psychology, including
28 forensic psychology. I now also supervise up to 12 doctoral dissertation students in clinical and

1 forensic psychology. I have published numerous journal articles and chapters in books, as well
2 as edited books and written treatment manuals. I have lectured extensively on the subjects of
3 child abuse, domestic violence, trauma, forensic psychology, child custody, and diagnostic
4 assessment.

5
6 I am a past president of the American Psychological Association Division of Trauma
7 Psychology, and I am currently co-chair of the National Partnership to End Interpersonal
8 Violence Across the Lifespan (NPEIV).

9 On November 23, 2011, I met with Joel Gamboa for the purpose of conducting a
10 psychological evaluation. Mr. Gamboa submitted to a battery of psychological tests, and also to
11 clinical and diagnostic interviews. As a result of my interview with Joel Gamboa, and based
12 upon my education, training, experience and expertise, I formed the following opinions:

13
14 Joel Gamboa was subjected to severe and long-lasting sexual abuse by Gonzalo Campos, a
15 member of Mr. Gamboa's childhood religion who held numerous positions of authority over
16 Mr. Gamboa during the course of the molestation, including as Mr. Gamboa's Bible Study
17 teacher. In connection with the sexual abuse, Mr. Campos instructed Joel that the sexual
18 contact was not unusual, nor improper.

19
20 The sexual abuse Mr. Gamboa experienced began at a young age. Because of Mr.
21 Gamboa's youth, the extended period of abuse, the positions of authority occupied by Mr.
22 Campos, and Campos' instructions that the abuse was not improper, the repeated violations
23 became something that Joel thought of as somewhat normal even though it did not quite feel
24 right. Joel did not understand while the abuse was ongoing that the abuse was wrongful or
25 psychologically harmful.

26
27 It is not unusual for children who experience sexual abuse to block out memories of
28 abuse due to the shame, guilt, fear, and trauma from what occurred. In fact, in my experience,

1 such a response to childhood sexual abuse is the rule rather than the exception. This response to
2 sexual abuse frequently prevents victims of childhood sexual abuse from understanding the
3 nature of the violation they have experienced, and from understanding the ways in which they
4 have been harmed. Victims of childhood sexual abuse often tend to remain in this type of
5 dissociative state regarding the sexual abuse until something triggers their memories in their
6 adult life which then may cause them to confront their past victimization. Even when triggered,
7 they often do not realize how the adverse effects from the abuse and trauma have influenced
8 their life, produced a variety of reactions, and may have led to numerous psychological and
9 physiological problems throughout their life. The connection between their adverse childhood
10 experiences and later symptomatology is rarely made by the adult survivor of childhood sexual
11 abuse until a mental health professional or someone else close to them begin to help them
12 understand the link.
13
14

15 The nature of the abuse, and surrounding circumstances appear to have caused Joel to
16 block out and disassociate much of the details of the abuse, and the feelings he experienced at the
17 time. As a result, Joel did not understand at the time of the childhood sexual abuse that he had
18 been victimized, nor was he capable of understanding that he had suffered psychological injury
19 as a result of the sexual abuse by Campos until recently.
20


21 It is my opinion that Joel is still struggling to understand the effects that the sexual abuse
22 by Campos has had in his life. He does not presently understand the entire scope of the damage
23 that he has experienced as a result of the abuse, particularly relating to his substance use, sexual
24 difficulties, anger and depression that have been present for quite some time, tracing back to
25 adolescence.
26

27 Joel is now beginning to realize the connection between the sexual abuse he experienced
28 as a child, and the psychological injury and consequences he has experienced as an adult, but he

1 did not begin to make such a connection until after two events took place: the revelation to Joel
2 that Campos was still participating as a Jehovah's Witness in San Diego, and his realization that
3 his own children could experience similar abuse. At the time that these events occurred, Joel
4 reasonably did not understand that the sexual abuse had caused him to suffer the negative
5 psychological effects during his adolescence and adulthood.
6

7 After each of the events described in the previous paragraph, Joel submitted to a
8 psychological evaluation in advance of mediation in this civil action. During that evaluation,
9 Joel may have begun to realize that he has experienced psychological symptoms as a result of
10 the abuse by Campos, but he still continues to grapple with the extent of that damage.
11

12 I declare under penalty of perjury to the best of my knowledge the foregoing is true and
13 correct. Dated this 28th day of November, 2011.
14

15 
16

17 Robert A. Geffner, Ph.D.
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