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5 Attorney for Plaintiffs
6

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

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

12 Plaintiffs,

13 vs.

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

18 Defendants.
19
20
21
22
23
24
25

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

**PLAINTIFFS NOTICE OF
LODGMET IN SUPPORT OF
MOTION TO AMEND TO ALLEGE
PUNITIVE DAMAGES**

Date: 12-2-11
Time: 10:30 a.m.
Judge: Steven R. Denton
Dept: C-73

1 Plaintiffs hereby lodge the following documents with their Motion to Amend their Complaint to
2 Allege Punitive Damages:

3 Exhibit 1: A true and correct copy of a letter dated January 28, 1994 and addressed from "Spanish, La
4 Jolla Congregation" to "Watchtower Bible & Tract Society." This letter was produced in
5 discovery in the above-entitled action and is Bates Numbered WT000012.

6 Exhibit 2: True and correct copies of pages 14, 15, 16, 17, 18, 19, 20, 21, 22, 44 and 45 of the deposition
7 of Dennis Palmer.

8 Exhibit 3: True and correct copies of pages 15, 16, 18, 24, 25, 48, 51, 52, 78, 81, 82, 83, 85, 86, 89, 90,
9 91, 92, 104, 105, 106, 107, 108, 109, 110, 124, 133, 134, 135, 137, 138, 139, 140, and 141
10 of the deposition of Gonzalo Campos.

11 Exhibit 4: True and correct copies of pages 12, 13, 14, 17, 18, 19, 21, 24, 32, 37, 38, 39, 40, 41, and 42
12 of the deposition of Ramon Preciado.

13 Exhibit 5: A true and correct copy of a letter from the Service Committee of the Body of Elders of the
14 Playa Pacifica Spanish Congregation (formerly La Jolla Spanish Congregation) dated March
15 29, 1995. This letter was produced to Plaintiffs in discovery in the above-captioned action.
16 The letter was originally written in Spanish, and the copy produced was a poor quality copy.
17 Plaintiffs have therefore also included in this Exhibit a certified Spanish to English translation
18 of the document provided by Defense Counsel.

19 Exhibit 6: True and correct copies of pages 35, 36, 37, 38, 39, 40, 41, and 42 of the deposition of John
20 Dorman.

21 Exhibit 7: A true and correct copy of a June 9, 1995 letter titled "Notificacion de Expulsion o
22 Desasociacion." This document was produced to Plaintiffs during the discovery process.
23 Originally, the document was heavily redacted, however more complete versions have since
24 been produced. Included within Exhibit 7 are an original version of the document drafted in
25 Spanish. Also included are two certified Spanish to English translations. The first translation
26 was commissioned by Plaintiffs, and only contains the translated form letter. The second
27 translation was provided to Plaintiffs by Defense Counsel and included a translation of only
28

1 the content added to the form letter. Between the two translations, the entirety of this Exhibit
2 is presented in English.

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

7 Exhibit 9: True and correct copies of pages 28, 29, 30, 31, 36, 37, 38, 40, 41 and 42 of the deposition of
8 Jesus Montijo.

9 Exhibit 10: True and correct copies of pages 28, 29, 34 and 35 of the deposition of Justino Diaz.

10 Exhibit 11: A true and correct copy of a letter written on letterhead of the Playa Pacifica Spanish
11 Congregation and addressed to "Watchtower Bible & Tract Society" and dated November 13,
12 1996. This letter was produced to Plaintiff during the discovery process and was originally
13 written in Spanish. Attached as Exhibit 11 are the original Spanish version of the letter as
14 well as a certified Spanish to English translation produced to Plaintiffs by Defense Counsel.

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

21 Exhibit 13: A true and correct copy of a letter addressed to "Watchtower Society" and date stamped
22 November 20, 1986. This document was produced to Plaintiffs during the discovery process.
23 This document was originally written in Spanish, and both the original version, as well as a
24 certified Spanish to English translation are attached as Exhibit 13.

25 Exhibit 14: A true and correct copy of a letter written by Manuela and John Dorman dated April 11, 1994.
26 This letter was produced to Plaintiffs during the discovery process.

27 Exhibit 15: A true and correct copy of a letter on letterhead of the Monmouth English Congregation which
28

1 is addressed to "Watchtower" and dated April 13, 1994. This document was produced to
2 Plaintiffs during the discovery process.

3 Exhibit 16: A true and correct copy of a letter dated June 9, 1994 that was produced to Plaintiffs during
4 the discovery process.

5 Exhibit 17: A true and correct copy of a letter written in Spanish on letterhead of the Playa Pacifica
6 Spanish Congregation and dated April 4, 1995. This document was produced to Plaintiffs in
7 the discovery process.

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

14 Exhibit 19: A true and correct copy of a letter addressed to the Body of Elders of the Playa Pacifica
15 Spanish Congregation and dated June 5, 2000. The document was produced to Plaintiffs
16 during the discovery process and was originally written in Spanish. Exhibit 19 includes both
17 the original Spanish version of the document, as well as a certified Spanish to English
18 translation provided to Plaintiffs by Defense Counsel.

19 Exhibit 20: A true and correct copy of a June 9, 1995 letter titled "Notificacion de Expulsion o
20 Desasociacion." This document was produced to Plaintiffs during the discovery process.
21 Included within Exhibit 20 is a copy of the document produced by Defendant Watchtower and
22 Bates Numbered WT000006. This document bears a handwritten notation in the top right
23 hand corner appearing in the original Spanish. Also is a certified Spanish to English
24 translation.

25 Exhibit 21: A true and correct copy of a letter addressed to "Watchtower" and dated August 18, 1995.
26 This letter was produced to Plaintiffs during the discovery process. The letter was originally
27 written in Spanish, and Exhibit 21 includes both the original version, and a certified Spanish
28

1 to English translation provided to Plaintiffs by Defense Counsel.

2 Exhibit 22: A true and correct copy of Plaintiffs' Proposed Third Amended Complaint.

3 Respectfully Submitted,

4 THE ZALKIN LAW FIRM, P.C.

5
6 Dated: 11-7-11



7 Devin M. Storey
8 Attorney for Plaintiffs

EXHIBIT 1

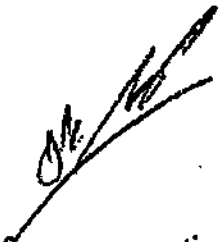
SSU FEB 14 1994 CMD FEB

Spanish, La Jolla Congregation
c/o Luis Rivera
4249 Nobel Dr. Apt. 11
San Diego, CA 92122

January 28, 1994

Watchtower Bible & Tract Society
25 Columbia Heights
Brooklyn, New York 11201

Dear Brothers:



We would like to change the name of our congregation to "Playa Pacifica" Congregation, San Diego, CA. The reason for the change is that our congregation is moving to a new double Kingdom Hall that has been purchased in the Pacific Beach area in San Diego. "Playa Pacifica" is a much better description of our territory, even now before the move and it will make even more sense after the move. And we feel that it will be more meaningful to the Spanish people in this part of San Diego. We have discussed this with our circuit overseer and he is in agreement with the change, and the congregation is in favor the change too. Our congregation number is 98806.

If this change is agreeable with you then we would we would like to make the change effective immediately. We send to you our warmest regards.

Your fellow servants,


Luis Rivera


Gonzalo Campos


Rick Bacon

EXHIBIT 2



ORIGINAL

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

JOHN DORMAN,
individually, and JOEL
GAMBOA, individually,

Plaintiffs,

vs.

) Case Number
) 37-2010-00092450-CU-PO-CTL

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.)

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 3

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)
9 Plaintiffs,)

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

10 v.)

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

18 Defendants.)
19
20
21

DEPOSITION OF

GONZALO CAMPOS

ZONA RIO, TIJUANA B.C., MEXICO

SEPTEMBER 2, 2011

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

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

25 FILE NO.: A507DA0

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
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
10 congregation, did you attend the preaching work that's
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
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,
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
20 publisher in the congregation? 11:40:31

21 A I don't remember if it was about six months or
22 a year. 11:40:44

23 Q After your baptism as one of the Jehovah's
24 Witnesses in the Linda Vista Congregation, did you ever
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		they talked to you about this incident?	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		that incident?	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		judicial committee for this incident?	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 confession? 11:58:21

8 A Yes. 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 That I had been playing and that's what I said, 11:59:13

20 that I had touched him inappropriately. 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:	12:55:34
2	Q And you were aware that were you concealing	12:55:34
3	this information, that the elders had a right to know.	12:55:39
4	Is that true?	12:55:44
5	A Yes.	12:55:51
6	Q Now, I want to talk about Joel Gamboa.	12:55:54
7	Did you have bible study with him?	12:56:01
8	A Yes.	12:56:08
9	Q How did you happen to come to study the bible	12:56:09
10	with Joel Gamboa? Were you appointed to do that by the	12:56:12
11	elders?	12:56:16
12	A No.	12:56:26
13	Q How did it come about?	12:56:27
14	A His mother asked me, if I could provide him	12:56:31
15	with studies.	12:56:34
16	Q Okay. Did he -- was his mother married at the	12:56:35
17	time?	12:56:40
18	A No.	12:56:42
19	Q How many people were you studying the bible	12:56:44
20	with at that time?	12:56:47
21	A I don't remember.	12:56:56
22	Q Was it more than Joel Gamboa?	12:56:58
23	A Yes, I think so.	12:57:05
24	Q Were they children?	12:57:06
25	A No.	12:57:09

1	the time the report was made by the Dorman family about	13:00:53
2	you.	13:00:57
3	Is that correct?	13:00:58
4	A Yes.	13:01:10
5	Q Do you know how the report from John Dorman	13:01:11
6	reached the body of elders?	13:01:15
7	A No.	13:01:27
8	Q Do you know John Dorman's mother's name?	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	13:01:40
13	Congregation?	13:01:44
14	A No.	13:01:49
15	Q Do you know where she lived at the time that	13:01:50
16	you were serving at the Playa Pacifica Congregation?	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	13:02:12
21	Dorman had been abused by you, do you know where she was	13:02:15
22	living?	13:02:20
23	A No.	13:02:29
24	Q Okay. <u>Were you informed by anyone among the</u>	13:02:30
25	<u>elders, that a report had been made, an accusation had</u>	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 14:20:02
2 I'm not sure how many congregations exist there in that 14:20:06
3 place. 14:20:09
4 Q But that's where you intend to start? 14:20:12
5 A Yes. 14:20:17
6 COURT REPORTER: Can you please spell 14:20:29
7 "Alfayucan"? 14:20:29
8 THE WITNESS: A-l-f-a-y-u-c-a-n. 14:20:29
9 BY MR. STOREY: 14:21:01
10 Q Is that -- how many words is that? 14:21:01
11 A Nine. 14:21:20
12 THE INTERPRETER: May I explain? 14:21:24
13 MR. STOREY: Yes. 14:21:26
14 THE WITNESS: Two. 14:21:30
15 BY MR. STOREY: 14:21:30
16 Q Okay. 14:21:30
17 What's the process to become baptized, as one 14:21:44
18 of Jehovah's Witnesses? 14:21:47
19 A So some questions are asked of you to see if 14:22:05
20 you fill the requirements to be baptized. 14:22:13
21 Q Who asks the questions? 14:22:18
22 A One or two of the elders are named in the 14:22:31
23 congregation to ask questions. 14:22:36
24 Q How many questions? 14:22:39
25 A I don't remember, maybe 80 questions. I don't 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?	14:34:56
2	A They can talk to him, but no -- but he's not	14:35:20
3	baptized.	14:35:26
4	Q Are there any other privileges that a baptized	14:35:30
5	publisher has, that an unbaptized publisher does not	14:35:34
6	have?	14:35:39
7	A A baptized publisher can work as a missionary.	14:36:00
8	<u>He can work in also any of the annexes in the world.</u>	14:36:06
9	Q <u>Are male baptized publishers and female</u>	14:36:17
10	<u>baptized publishers, given all of the same rights and</u>	14:36:21
11	<u>responsibilities?</u>	14:36:26
12	A <u>No.</u>	14:36:37
13	Q What are the differences?	14:36:38
14	A A male can preside over the congregation, while	14:36:52
15	a female cannot preside over the congregation when	14:36:54
16	everybody is there.	14:36:59
17	And the woman cannot represent the congregation	14:37:09
18	in public; in prayer.	14:37:13
19	Q Can a female lead field service?	14:37:24
20	A If the situation calls for it, yes. But if	14:37:48
21	there is a male present, then she has to cover her head.	14:37:51
22	And even if a man were not present, she would	14:38:00
23	still have to cover her head.	14:38:08
24	Q If a man was present, a baptized male was	14:38:18
25	present for field service, could a baptized female lead	14:38:22

1 Q How does covering her head, show respect to the 14:42:29
2 angels? 14:42:32

3 MR. MCCABE: Objection. Grounds of relevancy. 14:42:32
4 This is getting into matters of doctrine. This 14:42:34
5 is not an expert witness. 14:42:38

6 And why don't you get down to cross-examining? 14:42:43

7 BY MR. STOREY: 14:42:57

8 Q Go ahead and answer. 14:42:57
9 (Record read.) 14:43:08

10 THE WITNESS: Because, to show respect for the 14:43:13
11 angels. 14:43:15

12 BY MR. STOREY: 14:43:22

13 Q Do publishers report the number of hours they 14:43:22
14 spend in field service to the congregation? 14:43:25

15 A Yes. 14:43:35

16 Q Do they report it in writing? 14:43:37

17 A Yes. 14:43:42

18 Q Is it a form provided by the congregation? 14:43:43

19 A Yes. 14:43:48

20 Q Okay. What is the form called? 14:43:50

21 A "Service Report." 14:43:56

22 Q Who do publishers give that form to, at the 14:43:59
23 congregation? 14:44:03

24 A To the congregation secretary. 14:44:10

25 Q Did you fill out that form, when you were a 14:44:13

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

1 Q And did you always turn it in, to the 14:45:47
2 congregation secretary? 14:45:49
3 A Yes. 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 Does the bible study form, require you to 14:47:19
18 identify the person who received the bible study 14:47:20
19 session? 14:47:23
20 A Yes. 14:47:32
21 Q Is it fair to say, that a congregation 14:47:34
22 secretary would know or at least could know, if they read 14:47:37
23 the forms, all of the publishers who gave the bible study 14:47:40
24 session and all of the people who received that bible 14:47:43
25 study session? 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

15:21:28

8 A I don't understand.

15:21:40

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

15:21:44

15:21:49

11 A No.

15:22:04

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

15:22:04

15:22:08

14 A Yes.

15:22:17

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

15:22:18

15:22:20

17 A No.

15:22:31

18 Q Do you know what this form is?

15:23:43

19 A Yes.

15:23:51

20 Q What is it?

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

15:24:20

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

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 right-hand corner of this page? 15:29:27

8 A Yes. 15:29:28

9 Q Do you see the second line with the word 15:29:31

10 "secretario" written on the bottom of the line? 15:29:35

11 A (No verbal response.) 15:29:54

12 Q In the top right-hand corner. 15:29:55

13 A Oh, yes. 15:29:58

14 Q Is that your signature above the word 15:29:59

15 "secretario"? 15:30:01

16 A Yes. 15:30:02

17 Q Does that mean, that you were the secretary of 15:30:05

18 the congregation at the time of this report? 15:30:08

19 A Yes. 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

1	(Plaintiff's Exhibit 6, marked for	15:31:29
2	identification.)	15:31:29
3	BY MR. STOREY:	15:31:29
4	Q What is this document?	15:31:29
5	A When there was a change in the presiding	15:31:39
6	<u>overseer.</u>	15:31:45
7	Q And is this letter written to or written from	15:31:47
8	<u>the service committee of the Playa Pacifica</u>	15:31:50
9	<u>Congregation?</u>	15:31:56
10	A Yes.	15:32:04
11	Q And what's the date of this document?	15:32:05
12	A April 4th of '95.	15:32:12
13	Q Do you see your signature on this document?	15:32:16
14	A Yes.	15:32:21
15	Q Do you see the words underneath your	15:32:22
16	<u>signature?</u>	15:32:25
17	A Yes.	15:32:29
18	Q 'Gonzalo campos SEC period'?	15:32:31
19	A Yes.	15:32:34
20	Q Does that mean, that you were the secretary of	15:32:35
21	<u>the congregation on April 4, 1995?</u>	15:32:37
22	A Yes.	15:32:44
23	Q Would you please take a look at Exhibit 4, that	15:33:31
24	is the circuit overseer report.	15:33:34
25	(Witness complies.)	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 December 1991 and ending in December of 1994? 16:29:51

5 A Yes. 16:30:04

6 Q The abuse included mutual masturbation, anal 16:30:07
7 and oral sex? 16:30:10

8 A Yes. 16:30:19

9 Q Who is this document talking about? What 16:30:23
10 child? 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		<u>1982?</u>	16:55:09
7	A	<u>No, I don't want to.</u>	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	<u>I did abuse him.</u>	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:	<u>I tried to touch him</u>	16:56:56
21		<u>inappropriately.</u>	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 ██████ 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 ██████ with your penis? 16:58:18

20 A Yes. 16:58:25

21 Q Did you penetrate ██████? 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 ██████████'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 Was any announcement made to the congregation 17:04:23
14 about this complaint? 17:04:27

15 A I don't remember. Not that I remember. 17:04:33

16 Q Were your service privileges in any way 17:04:39
17 suspended and eliminated, after you attempted to touch 17:04:42
18 [REDACTED]? 17:04:46

19 A No. 17:04:56

20 Q Were you allowed to continue to perform field 17:05:00
21 service, after you attempted to touch [REDACTED] 17:05:02
22 inappropriately? 17:05:09

23 A Yes. But I don't remember very well 17:05:20
24 everything. 17:05:24

25 Q Were you allowed to continue to give bible 17:05:26

1 study lessons to children, after you attempted to touch 17:05:28
2 ██████████ 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 ██████████ inappropriately at that 17:05:50
6 time? 17:05:55

7 A No. 17:06:01

8 Q Have you ever spoken to ██████████ 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
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 4



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.

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DEPOSITION OF  
RAMON PRECIADO

February 9, 2011

11:33 a.m.

12555 High Bluff Drive  
Suite 260  
San Diego, California

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 there 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  
2 ed, does that mean  
3 that the judicial committee has found that person to be  
4 repentant?

5 A. Yes.

6 Q. If a person is reprov  
7 ed, is there still a  
8 written report of the findings of the judicial  
9 committee?

10 A. Oh, yes.

11 Q. So the envelope we talked about earlier, the  
12 judicial committee envelope --

13 A. Uh-huh.

14 Q. -- you would expect it to look the same if the  
15 person was disfellowshipped or if the person was  
16 reprov

17 ed?

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

19 Q. So what would be -- if a person was reprov

20 ed, what would be in that envelope?

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

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

25 A. Yes.

Q. Would you still expect any written evidence  
that was uncovered by the judicial committee to be in  
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 5**

CMD APR 14 1995

SSU APR 21 1995



KINGDOM HALL OF JEHOVAH'S WITNESSES  
PLAYA PACIFICA SPANISH CONGREGATION  
4243 INGRAM STREET  
SAN DIEGO, CA 92108 619-273-8483

29 de marzo de 1995

J

Estimados Hermanos:

En respuesta a su carta del 9 de junio de 1994 SDISSU enviada al cuerpo de ancianos de la Congregación Playa Pacifica, se ha hecho una investigación del asunto y para ello se ha recurrido al archivo de la Congregación Linda Vista Spanish donde ocurrieron los acontecimientos pero, en vista de que han pasado varios años de esto, no se encontró nada que pudiera darnos una fecha exacta de los acontecimientos en los archivos pero se habló con el Sr. Jorge Diaz quien vive en la misma congregación aunque no forma parte del comité judicial.

El Sr. Diaz me dijo que cuando fue enviado a los archivos de la congregación Linda Vista Spanish, se le dijo que los acontecimientos ocurrieron en el mes de mayo de 1994.

En esta ocasión, esto me ha dado a conocer de los hechos que ocurrieron en la congregación Linda Vista Spanish en el mes de mayo de 1994.

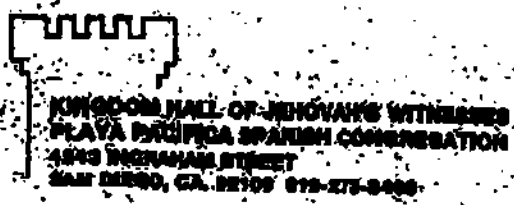
Como se puede apreciar, no existieron con respecto a los hechos que se mencionan en su carta, ni se habló con el Sr. Jorge Diaz quien vive en la congregación Linda Vista Spanish y quien me informó de los hechos que ocurrieron en la congregación Linda Vista Spanish en el mes de mayo de 1994. Como se puede apreciar, esto me ha dado a conocer de los hechos que ocurrieron en la congregación Linda Vista Spanish en el mes de mayo de 1994. Como se puede apreciar, esto me ha dado a conocer de los hechos que ocurrieron en la congregación Linda Vista Spanish en el mes de mayo de 1994.

Sus Hermanos  
Comité de Servicio  
Congregación Playa Pacifica

Luis Rivera, P.O.

Florentino Gracia, S.S.

Gonzalo Campos, Sec.



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 6**

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, LA JOLLA CHURCH; )  
 DEFENDANT DOE 2, LINDA VISTA )  
 CHURCH; DEFENDANT DOE 3, )  
 SUPERVISORY ORGANIZATION; )  
 DEFENDANT DOE 4, PERPETRATOR; and )  
 DOES 5 through 100, )  
 )  
 Defendants. )  
 )

ORIGINAL

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

DEPOSITION OF

JOHN DORMAN

SAN DIEGO, CALIFORNIA

FEBRUARY 2, 2011

ATKINSON-BAKER, INC.  
COURT REPORTERS  
1-800-288-3376  
www.depo.com

REPORTED BY: RUTH N. VALDIVIA, CSR NO. 11752, RPR

FILE NO.: A50121F

1           abused you.

2                    Do you remember how old you were?

3           A.    No, I do not.

4           Q.    Do you remember where it took place?

5           A.    Yes.

6           Q.    Where?

7           A.    In his van.

8           Q.    What kind of van did he have?

9           A.    Cargo, no windows on the side or nothing.

10          Q.    Do you remember how old you were?

11          A.    I was?

12          Q.    Yes.

13          A.    I'd be speculating.

14          Q.    Were you older than five?

15          A.    Yes.

16          Q.    Older than six?

17          A.    I really can't remember if I was in the first or  
18          second grade.

19          Q.    Okay. But somewhere in the time period between  
20          first and second grade --

21          A.    Yes.

22          Q.    -- is when he first abused you?

23          A.    Yes.

24          Q.    On that first occasion, what did he do to you?

25          A.    Had me sit in the middle of the van and played

1 with my buttocks.

2 Q. He played with you?

3 A. Put his hand on the back of my pants and squeezed

4 my butt cheeks as he was driving down the road. I don't

5 know, squeezed or fondled, whichever you want.

6 Q. Did he do anything else on that occasion?

7 A. No.

8 Q. Did you tell anybody that that had happened?

9 A. No.

10 Q. Did he tell you not to tell?

11 A. Yes.

12 Q. What did he tell you?

13 A. That we were special friends.

14 Q. At this time, how long had you known Gonzalo

15 Campos?

16 A. I would be speculating.

17 Q. Do you have any memory at all of knowing him prior

18 to this?

19 A. Yes.

20 Q. Did he attend the same congregation as your

21 mother?

22 A. I would be speculating.

23 Q. So did anything else occur on this first occasion

24 on this abuse other than the fondling?

25 A. No.

1 Q. When is the next time that he did something  
2 sexually inappropriate to you?

3 A. Would have been on the way home.

4 Q. The same day?

5 A. Yeah.

6 Q. And what did he do then?

7 A. Same thing. After we were done mowing the yard,  
8 he had to take me home.

9 Q. Whose yard did you mow?

10 A. I would be speculating. A client of his.

11 Q. So you were with him when he was on his work  
12 project?

13 A. Um-hum.

14 Q. And on the second occasion, did he do anything  
15 else to you other than fondle you?

16 A. No.

17 Q. Did you tell anyone about this?

18 A. No.

19 MR. KINSLOW: Objection. Vague and ambiguous as  
20 to time. Move to strike the answer. Also invades  
21 attorney-client privilege.

22 BY MR. McCABE:

23 Q. I don't want to know anything that you told your  
24 lawyer. I can't know that and don't want to know that.

25 A. Okay.



1 Q. But at the time that this happened, around that  
2 period, the next day or the next week, did you tell anybody  
3 that this happened?  
4 A. No.  
5 Q. When is the next time Gonzalo Campos abused you?  
6 A. As far as the time frame?  
7 Q. Yes, sir.  
8 A. I don't have one.  
9 Q. Was it the same month as the first two?  
10 A. I'd be speculating.  
11 Q. Same year as the first two occasions?  
12 A. Yes.  
13 Q. Same time?  
14 A. Twelve-month period.  
15 Q. Twelve-month period he abused you again?  
16 A. (Witness nods.)  
17 Q. Where did this abuse take place?  
18 A. On the way to the jobsite.  
19 Q. Was that some kind of gardening job?  
20 A. Yes.  
21 Q. What did he do on this occasion?  
22 A. On the way there, same thing, fondled my rear end.  
23 Q. Did he do anything else?  
24 A. Then after we were done working, we went over to a  
25 place that his mom was cleaning.

1 Q. She was a house cleaner?

2 A. Yes, she was, I'm assuming, yeah.

3 Q. And what happened there?

4 A. Well, upstairs, when we went to get dressed into  
5 our shorts, he performed oral sex on me in the upstairs  
6 bathroom.

7 Q. So he orally copulated you in the bathroom  
8 upstairs?

9 A. Yes.

10 Q. Do you recall how old you were?

11 A. No.

12 Q. But it was within a year of this --

13 A. Yes.

14 Q. -- first incident when you were either in first or  
15 second grade?

16 A. Yes.

17 Q. Did anything else happen that day?

18 A. Yes.

19 Q. What happened?

20 A. Well, while we were in the pool, he came up behind  
21 me and was touching me under my clothes under my shorts.

22 Q. What did he do when he touched you under your  
23 shorts?

24 A. He fondled my genitalia and penis area as well as  
25 my rear end, my buttocks.

1 Q. Did he penetrate you?

2 A. No.

3 Q. Anything else happen on that occasion in the pool?

4 A. In the pool, no.

5 Q. After the pool --

6 A. Yes.

7 Q. -- anything else happen?

8 A. Yes.

9 Q. What happened?

10 A. At the -- in the shower.

11 Q. What happened in the shower?

12 A. We were both naked, and I was sitting on his lap.

13 Now, at that time I can't recall if he penetrated me or not

14 in the shower, but I know that I was sitting on his lap for

15 some reason or another.

16 Q. Did he, sometime during that day, penetrate you?

17 A. Like I said, I'm not -- I can't recall.

18 Q. Okay.

19 A. All I know -- all I can remember is I was sitting

20 on his lap in the shower. And it wasn't a bathtub either,

21 it was a stand-up shower.

22 Q. Did anything else happen that day?

23 A. On the way home, same thing, fondled my rear end

24 on the way home.

25 Q. And that day or ensuing weeks, did you tell your

1 parents or anybody that this was happening to you?

2 A. No.

3 Q. Did Gonzalo Campos tell you not to tell?

4 A. Yes.

5 Q. What did he tell you?

6 A. That we were special friends.

7 Q. Anything else beside special --

8 A. If I wanted to keep going to work with him, I

9 would have to keep the secret between us.

10 Q. Was he paying you to work with him?

11 A. In cash, no.

12 Q. Did he pay you with anything else?

13 A. Toys.

14 Q. What kind of toys did he get for you?

15 A. He bought me a sound-wave transformer at ToysRUs.

16 He bought me like a three-pack of Matchbox card set or --

17 they weren't Matchbox cars, but they were like Hot Wheels

18 cars.

19 Q. Okay.

20 A. A three-pack of those. And that would have been a

21 different -- probably the first day would have been when he

22 gave me the cars.

23 Q. Prior to the first abuse in his van going to and

24 from the -- that mowing job, did he buy you presents?

25 A. Before that, no.

1 Q. Just when the abuse started he started buying you  
2 presents?

3 A. Yes.

4 Q. Prior to the first abuse, had you gone with him on  
5 other jobs?

6 A. No.

7 Q. When is the next occasion that you recall he  
8 abused you?

9 A. Within 10 or 12 months again.

10 Q. What happened on this next occasion?

11 A. Once again on the way to the place, he fondled my  
12 rear end. Got out, did our lawn mowing, stopped by his  
13 mother's or sister's apartment, possibly both, possibly all  
14 could have resided there, I don't know. And then he  
15 sodomized me.

16 Q. Was anybody else home?

17 A. No, not to my knowledge.

18 Q. Did he do anything else that day?

19 A. No.

20 Q. Did you tell your parents that this had happened  
21 or anyone within the immediate time period of it happening?

22 A. No.

23 Q. Did he tell you not to?

24 A. Yes.

25 Q. And again, did he tell you you were special

# **EXHIBIT 7**

**NOTIFICACIÓN DE EXPULSIÓN O DESASOCIACIÓN**  
(Sirvanse escribir toda la información a máquina o con letra de molde y tinta.)

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

Marquen los encasillados correspondientes, si aplican:  Anciano  Siervo ministerial  Precursor regular o especial  
 Alistado 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 su 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 le 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 anciano 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 practica de abuso que abarcaba 14 años.
  2. Recibió consejo y disciplina anterior.
  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 mentía para cubrir lo extenso de sus pecados, se le tuvo que confrontar con evidencia cada vez, y quiso imputar parte del culpa al victima 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.)

Eduardo Chavez Florentino Gracia  
Jenis Martinez Kevin Phillips

¿Apeló 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:

|                                           |                                    |
|-------------------------------------------|------------------------------------|
| 2. Nombre de la persona entonces _____    | 1. Fecha _____                     |
| 4. Congregación que tomó la acción: _____ | 3. Fecha de restablecimiento _____ |
| 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.)

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)    | (Signature)       |
| Eduardo Chavez | Florentino Garcia |
| (Signature)    | (Signature)       |
| Jesus Martinez | 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).

## **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}  
Florentino Gracia**

**{Signature}  
Jesus Martinez**

**{Signature}  
Kevin Phillips**

**No**

**INSTRUCTIONS TO FOLLOW TO REPORT DISFELLOWSHIPPINGS O DISASSOCIATIONS**

# **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. )

) Case Number  
) 37-2010-00092450-CU-PO-CTL

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. )

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**



**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.

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DEPOSITION OF

JESUS MONTIJO

February 9, 2011

10:08 a.m.

12555 High Bluff Drive  
Suite 260  
San Diego, California

[www.DEPO911.com](http://www.DEPO911.com)

toll free (877) DEPO 9-1-1



JESUS MONTIJO

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                     ?

23 A.                     .                     

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 ██████ said it.

4 Q. So did you have more than one conversation with  
5 ██████?

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 ██████ 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 ██████  
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 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 Number  
) 37-2010-00092450-CU-PO-CTL

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. )

INTERPRETED DEPOSITION OF JUSTINO DIAZ,  
called on behalf of the Plaintiffs, at 12555  
High Bluff Drive, Suite 260, San Diego,  
California, on Tuesday, February 8, 2011,  
commencing at 10:14 a.m., before Judy Runes,  
California CSR No. 5874.

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 11**

SSEDEC 13 1996

Congregación Playa Pacifica

c/o Kevin Phillips  
7576 Winterwood Ln.  
San Diego, CA 92128

November 13, 1996

Watchtower Bible and Tract Society  
Departamento de Servicio

Dear Brothers:

Tomamos esta oportunidad para expresar nuestros saludos calurosos. Les mandamos esta carta para informarles de acontecimientos recientes en el caso de Gonzalo Campos, expulsado desde Mayo de 1995, 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 1995, tanto hijos de estudiantes como de hermanos bautizados. Ese abuso había continuado a pesar de que se le hizo un comité judicial alrededor de 1988, 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 1996, 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 1995, 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 trámites de comprar una casa del esta misma familia, y tenía 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 dejamos saber adonde 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 (quizas en Abril '96). No hemos podido averiguar todavía que 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 sugieren que debería pasar antes de que volvamos a considerarlo para reestablecimiento?

Deseamos 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 les bendiga en todo su duro trabajo.

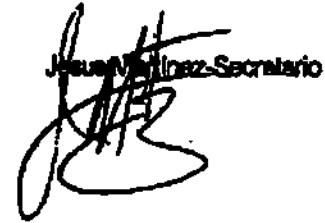
Sinceramente,



Kevin Phillips-S. Presidente



Erasmo Flores-S. de Servicio



Jesús Martínez-Secretario

**Congregación Playa Pacifica**

c/o Jesús Phillips  
7678 Wilburwood Ln.  
San Diego, CA 92128

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 the 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}  
Erasmio Flores Service Overseer

{Signature}  
Jesus Martinez- Secretary

## **EXHIBIT 12**

SFH AUG 0 2 1999

**Congregación Playa Pacifica Spanish  
San Diego, California**

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

24 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 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 reservas 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 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 [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. El 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. Entonces, abusó de un niño. Y de allí en adelante no pudo desechar esos pensamientos y deseos. En 1986 se formó un comité judicial debido a la acusación de conducta impropia con un niño. El 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. El 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 confesar, 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. El 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 ks91S 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 siervo ministerial ni precursor. Pero también, ¿excluye estrictamente ayudar con sonido, pasar micrófonos, ser acomodador, etc.? ¿Qué pautas guiadoras 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

  
Jesus Martinez--Secretario

  
Juan Guardado--Sup. de servicio

  
Ronald B. Cortez--Sup. Presidente

SFH AUG 02 1999

**Playa Pacifica Spanish Congregation  
San Diego, California  
3147 Clairemont Drive #4, San Diego, CA 92117-6434**

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 . . . victims and their 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 is 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 reinstate, 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 13**

SCS NOV 20 1986

CONFIDENTIAL

Cong. Linda Vista Spanish 21642

Watchtower Society  
25 Columbia Heights  
Brooklyn, NY 11201

Estimados hermanos:

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

CONGREGACION: Linda Vista Spanish

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

SUPERINTENDENTE PRESIDENTE:

Justino Diaz

SECRETARIO:

Dennis Palmer

SUPERINTENDENTE DE SERVICIO:

Román Ibarra

CONDUCTOR DE LA ATALAYA:

Dennis Palmer - Linda Vista

SUPERINTENDENTE DE LA ESCUELA:

Ramón Preciado

Ramón Preciado - La Jolla

SIERVOS MINISTERIALES: Rogelio Enriquez, Rodney Garcia, Jesús Martinez,  
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 Martinez

NOMBRES DE LOS PRECURSORES REGULARES QUE QUEOAN EN ESTA CONGREGACION:

Rogelio Enriquez, Arturo Jemio, Alicia Palmer

Marina Ayllón,

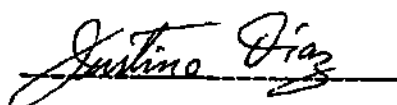
2. NUMERO DE PUBLICADORES: 55 PRECURSORES REGULARES: 4 TOTAL: 59 ?

(asi, la Sociedad puede determinar cuantos ejemplares de Nuestro Ministerio  
del Reino continuaran enviando a la congregacion).

Sus hermanos:

80 kmS

COMITE DE SERVICIO:



SCS NOVEMBER 26, 1986

CONFIDENTIAL

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 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 Gonzalos'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 1994

**Monmouth English Congregation**

c/o Ken Mason  
668 S College St  
Monmouth, OR 97301

April 13, 1994

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 asking her to contact 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 Sister 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 Sister 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 unbaptized 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,

*Ken Mason*

*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 4 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**

Congregación Playa Pacifica Spanish  
San Diego, California

3147 Clairmont 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 <sup>siete</sup> 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 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, 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 tración de su puesto de superintendente, dos ancianos del comité original los hermanos Kevin Phillips y Jesús Martínez lo encuentran difícil perdonarlo 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 [redacted], 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, ([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

[redacted]

1 - Washington  
1 - Caso de 1986  
1 - memo de de la congregación  
entendido

Especialmente por que no se puede confiar en él. Confieso que he estado hablando al respecto de los otros que se han mudado. Robert Phillips ha estado hablando con ella. Después de esto, cuando ellos restablecimiento parece que la razón fue por casa.

- 3
- [redacted] (708 al [redacted] [redacted])  
 2 1/2 a 3 años (de [redacted])  
 [redacted] (7-8) (un año)
  - [redacted] (6) 5-6 ) [redacted] (203 Ocasiones)  
 [redacted] (una Ocasión)
  - Johnny Dorman (607 al [redacted] [redacted])  
 (Fue a Washington) (una o dos Ocasiones)
  - ① Hijo de [redacted] (607) una Ocasión  
 Acariciar de órganos del niño; [redacted] (1 into) 1980  
 [redacted] (1 into) 1980
  - ② [redacted] (609) - en una Ocasión  
 (quien [redacted] [redacted])  
 Acariciar ~~los~~ los órganos del niño - dentro de la ropa  
 tocó al niño con su miembro viril pero no hubo sexo anal.
  - ③ [redacted] (203 Ocasiones - le  
 acarició los órganos genitales dentro de la ropa.  
 [redacted] jugando hacia la lucha libre.
  - ④ [redacted] (6-7 años - 102 veces -  
 [redacted] a ella sus órganos dentro de la ropa.

**Playa Pacifica Spanish Congregation**  
San Diego, California  
Clairemont 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 victims and their families have moved out of state. A family moved from the congregation, 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

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

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

## **EXHIBIT 19**

**Do Not Destroy**

SFG:SFH 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 abusen 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 apresuradamente 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 llena 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 Asambleas. 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 vean 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) paseen 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 concluye 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 utilizársele 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

SFA JUN 6 2000

SFG:SFH June 5, 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 en 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 20**

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

|                                              |                  |                                                |                           |
|----------------------------------------------|------------------|------------------------------------------------|---------------------------|
| <u>Playa Pacifica</u>                        | <u>San Diego</u> | <u>CA</u>                                      | <u>98806</u>              |
| Nombre de congregación                       | Ciudad           | Estado                                         | Número de congregación    |
| <u>Gonzalo Campos</u>                        |                  | <u>9 de Junio, 1995</u>                        | <u>21/ABR/00</u>          |
| Nombre de la persona expulsada o desasociada |                  | Fecha del anuncio de expulsión o desasociación | Fecha de restablecimiento |

Marquen los encasillados correspondientes, si aplican:  Anciano  Siervo ministerial  Precursor regular o especial  
 Alistado 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 ml, 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 trató de una desasociación, el comité seleccionado para tratar el caso debe firmar.)

Eduardo Chaves

FLORENTINO GRACIA

Jesús Martínez

Florentino Gracia

Kevin Phillips

¿Apeló 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 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.)

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<br>expulsion or<br>disassociation | Date of<br>reestablishment |

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).

## **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 21**

CMD SEP 5 1995

Comité Judicial  
Congregación Playa Pacifica Span.  
c/o Eduardo Chavez

SSU SEP - 6 1995

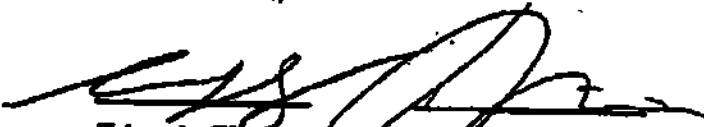

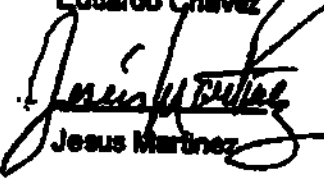

August 18, 1995

WATCHTOWER  
25 Columbia Heights  
Brooklyn, NY 11201-2483

Estimados Hermanos:

Esta carta viene en respuesta a su correspondencia SD:SSU 8 de agosto de 1995, referente a la omisión de pruebas del males cometidos por Gonzalo Campos. Aparte de la declaración de tres víctimas, Gonzalo admitió a todos los cargos presentados en el comité judicial y expuestos en el informe de su expulsión. Agradecemos su atención a este detalle.

Sus hermanos,

|                                                                                     |                                                                                     |
|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
|  |  |
| Eduardo Chavez                                                                      | Kevin Phillips                                                                      |
|  |  |
| Jesus Martinez                                                                      | Florentino Garcia                                                                   |

CMO Sep 5 1995

Judicial Committee  
Playa Pacifica Spanish Congregation  
c/o Eduardo Chavez

August 18, 1995

WATCHTOWER  
25 Columbia Heights  
Brooklyn, NY 11201-2483

Dear Brothers:

This letter comes in response to your correspondence SDI:SSU August 8, 1995, regarding the omission of evidence of the wrong committed by Gonzalo Campos. Apart from the statements of the three victims, Gonzalo admitted to all the accusations presented in the judicial committee and shown on the disfellowshipping notice. We appreciate your attention to this detail.

Your brothers,

{Signature}  
Eduardo Chavez

{Signature}  
Kevin Phillips

{Signature}  
Jesus Martinez

{Signature}  
Florentino Gracia

## **EXHIBIT 22**

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 Attorneys for Plaintiffs

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

12 John Dorman, Individually, and Joel  
13 Gamboa, Individually,

14 Plaintiffs,

15 v.

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

22 Defendants.

CASE NUMBER: 37-2010-00092450-CU-PO-CTL

THIRD AMENDED COMPLAINT FOR DAMAGES  
FOR:

- 1. NEGLIGENCE;
- 2. NEGLIGENT SUPERVISION/  
FAILURE TO WARN;
- 3. NEGLIGENT HIRING/RETENTION
- 4. DELETED;
- 5. NEGLIGENT FAILURE TO WARN, TRAIN,  
OR EDUCATE PLAINTIFF;
- 6. DELETED
- 7. DELETED;
- 8. SEXUAL BATTERY;
- 9. SEXUAL HARASSMENT; AND
- 10. BREACH OF FIDUCIARY DUTY AND / OR  
CONFIDENTIAL RELATIONSHIP.

[Demand for Jury Trial]

1 Based upon information and belief available to Plaintiffs, John Dorman and Joel  
2 Gamboa, at the time of the filing of this Third Amended Complaint, Plaintiffs make the  
3 following allegations:

4 **PARTIES**

5 1. Plaintiff, John Dorman, is an adult male. Plaintiff was a minor at the time of the  
6 sexual abuse alleged herein. In this Third Amended Complaint, Plaintiff John Dorman  
7 asserts causes of action against Defendant Linda Vista Church, Defendant Supervisory  
8 Organization, Defendant Perpetrator and Does 5 through 100 only.

9 1.1 Plaintiff, Joel Gamboa, is an adult male. Plaintiff was a minor at the time of the  
10 sexual abuse alleged herein. In this Third Amended Complaint, Plaintiff Joel Gamboa  
11 asserts causes of action against Defendant La Jolla Church, Defendant Linda Vista  
12 Church, Defendant Supervisory Organization, Defendant Perpetrator and Does 5 through  
13 100.

14 2. Defendant La Jolla Church ("La Jolla Church") is a California corporation, authorized  
15 to conduct business and conducting business in the State of California, with its principal  
16 place of business in the County of San Diego, California. Defendant La Jolla Church has  
17 responsibility for Jehovah's Witness Church operations in the La Jolla area of California.

18 2.1. Defendant Linda Vista Church ("Linda Vista Church") is an entity of unknown  
19 designation, authorized to conduct business and conducting business in the State of  
20 California, with its principal place of business in the County of San Diego, California.  
21 Defendant Linda Vista Church has responsibility for Jehovah's Witness Church operations  
22 in the Linda Vista area of California.

23 2.2. Defendant Supervisory Organization ("Supervisory Organization") is a branch of the  
24 Jehovah's Witness religion of unknown business designation located in Brooklyn, New  
25 York, and conducting business in the State of New York, and elsewhere. Defendant  
26 Supervisory Organization is the highest level of Jehovah's Witness governance, and is  
27 responsible for administration of the Jehovah's Witness Church worldwide, including  
28 operations in California.

2.3. Defendant Gonzalo Campos ("Perpetrator ") was at all times relevant a member of

1 the Jehovah's Witness Church. Perpetrator held various leadership positions within  
2 Defendant La Jolla Church and Defendant Linda Vista Church. During the dates of abuse  
3 of Plaintiffs, Perpetrator was a practicing speaker, ministerial servant and / or Elder in the  
4 leadership at Defendant La Jolla Church, Defendant Linda Vista Church and Does 5  
5 through 100, and was under the direct supervision, employ and control of Defendant La  
6 Jolla Church, Defendant Linda Vista Church, Defendant Supervisory Organization and  
7 Does 5 through 100.

8 3. Defendant Does 5 through 100, inclusive, are individuals and/or business or  
9 corporate entities incorporated in and/or doing business in California whose true names  
10 and capacities are unknown to Plaintiffs, who therefore sue such Defendants by such  
11 fictitious names, and who will amend the Complaint to show the true names and capacities  
12 of each such Doe Defendant when ascertained. Each such Defendant Doe is legally  
13 responsible in some manner for the events, happenings and/or tortious and unlawful  
14 conduct that caused the injuries and damages alleged in this Complaint.

15 4. Each Defendant is the agent, servant and/or employee of other Defendants, and  
16 each Defendant was acting within the course and scope of his, her or its authority as an  
17 agent, servant and/or employee of the other Defendants. The Defendants, and each of  
18 them, are individuals, corporations, partnerships and other entities which engaged in,  
19 joined in and conspired with the other wrongdoers in carrying out the tortious and unlawful  
20 activities described in this Complaint, and the Defendants, and each of them, ratified the  
21 acts of the other Defendants as described in this Complaint.

#### 22 **BACKGROUND FACTS APPLICABLE TO ALL COUNTS**

23 5. Plaintiff John Dorman was born on September 7, 1977. Plaintiff John Dorman was  
24 repeatedly and viciously sexually abused by Perpetrator on numerous occasions between  
25 1983 and 1985, when he was between the approximate ages of six and eight.

26 5.1. Plaintiff John Dorman experienced a strict Jehovah's Witness upbringing. Plaintiff  
27 John Dorman was taught to look at non-members of the Jehovah's Witness faith with  
28 skepticism, and to trust in members of the Jehovah's Witness faith. Plaintiff John Dorman

1 was taught to trust, respect and revere elders in the Jehovah's Witness Church. As a  
2 minor in the Jehovah's Witness faith, Plaintiff John Dorman did not contemplate that an  
3 elder in the Jehovah's Witness Church would mislead him.

4 5.1.1. Plaintiff John Dorman attended religious services with his mother at Defendant La  
5 Jolla Church beginning in approximately 1982, and continued attending services there until  
6 approximately late 1985, or early 1986. Plaintiff John Dorman attended religious services  
7 with his mother at Defendant Linda Vista Church beginning in approximately 1981, and  
8 continuing until approximately 1987. Plaintiff John Dorman and his mother attended  
9 services regularly at both Defendant La Jolla Church and Defendant Linda Vista Church,  
10 varying by the day of the week.

11 5.1.2. Plaintiffs are informed and believe, and on that basis allege, that between 1982 and  
12 1987, Defendant Perpetrator held a position with Defendant La Jolla Church and  
13 Defendant Linda Vista Church as a "pioneer." As a pioneer, the Perpetrator made a  
14 commitment to spend a certain number of hours each month involved in preaching activity.  
15 Plaintiffs are informed and believe, and on that basis allege that regular pioneers must be  
16 recommended by the congregation's elders, before he or she can be appointed as a  
17 regular pioneer.

18 5.1.3. While serving Defendant La Jolla Church and Defendant Linda Vista Church as a  
19 pioneer, the Perpetrator performed activities such as preaching at religious services,  
20 preaching at people's homes, and providing bible study classes to Jehovah's Witness  
21 children in the children's homes.

22 5.1.4. The Perpetrator regularly taught Plaintiff John Dorman in the family home from  
23 approximately 1982 through approximately 1987. The Perpetrator frequently picked up  
24 Plaintiff John Dorman, and his mother, and took them to religious services at which the  
25 Perpetrator preached.

26 5.1.5. Without the access to Plaintiff John Dorman created by the Perpetrator's position  
27 with Defendant La Jolla Church and Defendant Linda Vista Church as a pioneer, preacher  
28 and bible study teacher, the Perpetrator could not have sexually molested Plaintiff John



1 Dorman.

2 5.2. Plaintiff Joel Gamboa was born on December 31, 1980. Plaintiff Joel Gamboa was  
3 repeatedly and viciously sexually abused by Perpetrator from approximately 1988 until  
4 approximately 1995. The abuse ceased when Plaintiff Joel Gamboa moved away from the  
5 San Diego area in 1995.

6 5.3. At the time of the sexual abuse by Perpetrator, Joel Gamboa attended religious  
7 services at Defendant Linda Vista Church. Perpetrator frequently spoke at religious  
8 services at Defendant Linda Vista Church, and also was sent to Plaintiff Joel Gamboa's  
9 home by Defendant Linda Vista Church to instruct Plaintiff Joel Gamboa in Jehovah's  
10 Witness matters.

11 5.4. Plaintiffs are informed and believe and on that basis allege that Defendant La Jolla  
12 Church was aware that Perpetrator was providing Plaintiff Joel Gamboa instruction through  
13 Defendant Linda Vista Church. Plaintiffs are further informed and believe and on that  
14 basis allege that Defendant Linda Vista was aware that Perpetrator had been reprovved for  
15 his conduct in sexually abusing boys at Defendant La Jolla Church, but continued to allow  
16 Perpetrator access to Joel Gamboa. Plaintiff Joel Gamboa was sexually abused during  
17 these bible study classes taught by the Perpetrator.

18 5.4.1. Without the access to Plaintiff Joel Gamboa created by the Perpetrator's position  
19 with Defendant La Jolla Church and Defendant Linda Vista Church as a pioneer, preacher,  
20 ministerial servant, elder and bible study teacher, the Perpetrator could not have sexually  
21 molested Plaintiff Joel Gamboa.

22 5.5. Plaintiffs are informed and believe and on that basis allege that Defendant  
23 Supervisory Organization exerts influence over which members of the Jehovah's Witness  
24 faith can be appointed as elders and ministerial servants. Plaintiffs are further informed  
25 and believe and on that basis allege that Perpetrator could not have been appointed as an  
26 elder or ministerial servant without the approval of Defendant Supervisory Organization.

27 6. REMOVED.

28 6.0.1. Plaintiffs are informed and believe and on that basis allege that, the Perpetrator was

1 baptized Jehovah's Witness on September 27, 1980. Plaintiffs are further informed and  
2 believe that the Perpetrator was extensively involved in both Defendant La Jolla Church  
3 and Defendant Linda Vista Church from approximately 1982 through at least 1988. During  
4 that time, the Perpetrator served as a pioneer, preached to the congregations at both  
5 Defendant La Jolla Church and Defendant Linda Vista Church, preached to families in the  
6 communities of both Defendant La Jolla Church and Defendant Linda Vista Church, and  
7 taught bible study to Jehovah's Witness children from both Defendant La Jolla Church and  
8 Defendant Linda Vista Church.

9 6.0.2. Plaintiffs are further informed and believe that in 1988, the Perpetrator was  
10 appointed as a ministerial servant of Defendant La Jolla Church. Ministerial servants are  
11 appointed to assist the elders with routine work in the local congregation. Plaintiffs are  
12 further informed and believe that while serving as a ministerial servant, the Perpetrator  
13 continued to preach to the congregations of Defendant La Jolla Church and Defendant  
14 Linda Vista Church, preach in local homes, and teach bible study to children. Plaintiffs are  
15 further informed that the Perpetrator could not have been appointed as a ministerial  
16 servant without the approval of Defendant Supervisory Organization.

17 6.0.3. Plaintiffs are informed and believe that in approximately June of 1993, the  
18 Perpetrator was appointed as an elder of Defendant La Jolla Church. Each congregation  
19 of Jehovah's Witnesses has a body of elders who are responsible for the governance of  
20 the congregation, including selecting speakers, directing preaching and serving on  
21 committees that investigate and decide disciplinary action cases and impose punishments.  
22 The elders are the highest authority at the congregational level. Plaintiffs are further  
23 informed that the Perpetrator could not have been appointed as an elder without the  
24 approval of Defendant Supervisory Organization.

25 6.0.4. Plaintiffs are informed and believe and on that basis allege that by October of 1993,  
26 at the latest, the Perpetrator had been selected as the Secretary of Defendant La Jolla  
27 Church, and was therefore an officer of the corporation.

28 6.1. REMOVED.

1 6.1.1. Plaintiffs are informed and believe and on that basis allege that prior to his  
2 appointment as an elder of Defendant La Jolla Church in 1993, the Perpetrator was  
3 frequently chosen as a speaker to preach to the congregation by the elders and was being  
4 groomed by the elders at Defendant La Jolla Church to become an elder himself.

5 6.2. REMOVED.

6 7 REMOVED.

7 7.0.1. In approximately December of 1993, or January of 1994, Plaintiff John Dorman  
8 confided in his mother that he had been sexually abused by Perpetrator. On the night that  
9 Mrs. Dorman learned that her son had been sexually abused by Perpetrator, she placed a  
10 telephone call to an elder at Defendant La Jolla Church, Roberto Rivera, and reported the  
11 abuse.

12 7.1. After getting off the phone with the elder from Defendant La Jolla Church, Mrs.  
13 Dorman called Perpetrator to confront him about the abuse of her son. Perpetrator  
14 confessed that he had sexually abused Plaintiff John Dorman, but defended himself by  
15 saying that it had occurred several years earlier, and that he had been "reproved" by  
16 Defendant La Jolla Church, which means that a judicial committee within Defendant La  
17 Jolla Church determined that Perpetrator was considered to be repentant for his acts.

18 7.1.1. Plaintiffs are informed and believe and on that basis allege that Defendant La Jolla  
19 Church and Defendant Linda Vista Church received complaints about sexual abuse by the  
20 Perpetrator prior to the Perpetrator's appointment as an elder of Defendant La Jolla  
21 Church.

22 7.1.2. Approximately the next day, Mrs. Dorman discussed the abuse with elder Jesus  
23 Martinez from Defendant La Jolla Church.

24 7.1.3. Plaintiffs are informed and believe and on that basis allege that Mrs. Dorman also  
25 spoke to elders with Defendant Linda Vista Church about the molestation of her son by the  
26 Perpetrator.

27 7.1.4. Plaintiffs are informed and believe and on that basis allege that in approximately  
28 December of 1993 or January of 1994, Mrs. Dorman reported the abuse of her son by the

1 Perpetrator to Brother Ken Nissen with the Monmouth, Oregon Kingdom Hall. Plaintiffs are  
2 further informed and believe that after speaking with Brother Nissen, Mrs. Dorman wrote a  
3 letter of complaint to Defendant Supervisory Organization regarding the abuse.

4 8. In approximately 1995, Plaintiff John Dorman received a telephone call from an  
5 elder from Defendant La Jolla Church. Plaintiff John Dorman was interviewed about the  
6 abuse by Perpetrator, and was told that the statute of limitations had already expired for  
7 both criminal and civil claims relating to the molestation by Perpetrator. This statement  
8 was not correct when it was made. The civil statute of limitation had not expired on Plaintiff  
9 John Dorman's claim at that time.

10 8.1. Plaintiff is informed and believes and on that basis alleges that the representative of  
11 Defendant La Jolla Church that made this statement knew that it was incorrect when made,  
12 and intentionally misled Plaintiff John Dorman so that he would be unable to exercise his  
13 legal rights to press criminal charges or pursue a civil action resulting from the molestation  
14 by Perpetrator.

15 8.2. Plaintiff John Dorman reasonably relied on the statement by the representative of  
16 Defendant La Jolla Church that he was unable to pursue a civil action or press criminal  
17 charges resulting from the molestation by Perpetrator due to the expiration of the statute of  
18 limitations. Plaintiff, in reliance on the representations by the elder from Defendant La  
19 Jolla Church, did not pursue criminal charges against Perpetrator, nor did he pursue civil  
20 claims against Perpetrator or Defendant La Jolla Church.

21 8.3. Plaintiff John Dorman did not discover, and could not reasonably have discovered,  
22 that the criminal and civil statutes of limitation had not expired in 1995, as represented by  
23 the elder from Defendant La Jolla Church until January of 2010.

24 8.4. During her conversation with an elder from Defendant La Jolla Church, Mrs. Dorman  
25 was told that Defendant was aware that Perpetrator had sexually abused children from  
26 Defendant La Jolla Church, and that she should not pursue the matter any further. The  
27 representative of Defendant La Jolla Church informed Mrs. Dorman that this was a church  
28 matter, and Defendant La Jolla Church would take care of it. The elder at Defendant La

1 Jolla Church also threatened that if Mrs. Dorman pursued there would be repercussions  
2 that would effect her and her family's standing in the local Jehovah's Witness community.  
3 Plaintiffs are informed and believe and on that basis allege that the elder was Roberto  
4 Rivera.

5 8.5. At the time the threat was made, Mrs. Dorman reasonably believed that the  
6 representative of Defendant La Jolla Church would follow through on the threat and that  
7 there would be dire consequences for her and her family.

8 8.6. This threat reasonably caused Mrs. Dorman to cease pursuing the matter of the  
9 molestation of her son by Perpetrator and to accept and believe the representations of the  
10 elder of Defendant La Jolla Church that the criminal and civil statutes of limitations had  
11 expired by 1995.

12 8.7. Defendant La Jolla Church, by virtue of its threats against Mrs. Dorman and its  
13 misleading statements to Plaintiff John Dorman, prevented Plaintiff John Dorman from  
14 commencing an action at any earlier date. Defendant La Jolla Church is equitably  
15 estopped from asserting the statute of limitations as a bar to Plaintiff John Dorman's  
16 action.

17 9. Plaintiffs are informed and believe and on that basis allege that although Defendant  
18 La Jolla Church was aware, prior to December of 1993, that Perpetrator had sexually  
19 abused children at Defendant La Jolla Church, Defendant La Jolla Church determined that  
20 Perpetrator was repentant for his sexual molestation of children and was retained in his  
21 leadership position with Defendant La Jolla Church where he continued to have access to  
22 children and continued to abuse Plaintiff Joel Gamboa. By retaining Perpetrator after  
23 learning of his past sexual abuse of children, Defendant La Jolla Church ratified and  
24 authorized Perpetrator' conduct.

25 9.1. In approximately December of 1993 or January of 1994, Defendant La Jolla Church  
26 gained actual knowledge that Plaintiff John Dorman was sexually abused by Perpetrator.  
27 Notwithstanding this knowledge, Defendant La Jolla Church retained Perpetrator in his  
28 leadership position with Defendant La Jolla Church. By retaining Perpetrator after learning

1 of his sexual abuse of Plaintiff John Dorman, Defendant La Jolla Church ratified and  
2 authorized Perpetrator' conduct.

3 9.1.1. Plaintiffs are informed and believe, and on that basis allege, that in March of 1994,  
4 Defendant La Jolla Church merged into Defendant Linda Vista Church. Following the  
5 merger, the Perpetrator remained an elder of Defendant Linda Vista Church and served as  
6 the Secretary of corporation. Defendant Linda Vista Church thereby ratified the sexual  
7 misconduct by the Perpetrator.

8 9.2. In approximately 1995, after his family had moved away from the San Diego area,  
9 Plaintiff Joel Gamboa received a telephone call from at least two Jehovah's Witness  
10 elders, who Plaintiff Joel Gamboa believed to be Gene Case and Salvador Flores. Joel  
11 was asked if he had been sexually molested by Perpetrator. Joel Gamboa confirmed that  
12 he had been sexually abused. Defendant La Jolla Church did not report the abuse to law  
13 enforcement, did not offer any aid to Plaintiff Joel Gamboa in recovering or minimizing the  
14 damage caused by the molestation, and Plaintiff Joel Gamboa is informed and believes  
15 and on that basis alleges that Defendant La Jolla Church and Defendant Linda Vista  
16 Church retained Perpetrator in his leadership positions. By doing these acts, Defendant La  
17 Jolla Church and Defendant Linda Vista Church ratified and authorized Perpetrator'  
18 conduct.

19 9.3. Defendant La Jolla Church, having knowledge, prior to December of 1993, that  
20 Perpetrator had committed acts of childhood sexual abuse, and retaining Perpetrator in a  
21 leadership position authorized Perpetrator' subsequent sexual abuse of children, including  
22 Plaintiff Joel Gamboa.

23 10. Defendant La Jolla Church, through its Elders, ministerial servants, speakers,  
24 employees, agents ad volunteers knew of unlawful sexual conduct by Perpetrator prior to  
25 some or all of the molestation of Plaintiff Joel Gamboa.

26 10.1. After becoming aware of acts of childhood sexual abuse committed by Perpetrator,  
27 Defendant La Jolla Church did not warn or advise the congregation of the danger that  
28 Perpetrator posed to children, or his past history of sexually abusing minors.

1 10.2. Defendant La Jolla Church actively concealed Perpetrator' sexual abuse of children,  
2 and prevented members of the congregation from learning of Perpetrator' sexual abuse of  
3 children.

4 10.3. Defendant La Jolla Church, notwithstanding its knowledge of acts of childhood  
5 sexual abuse committed by Perpetrator, held Perpetrator out to the community and the  
6 conregation, including Plaintiff Joel Gamboa, as a ministerial servant, speaker and / or  
7 Elder in good standing with Defendant La Jolla Church. In doing so, Defendant La Jolla  
8 Church represented that Plaintiff Joel Gamboa, and other minor parishioners, were safe in  
9 Perpetrator' presence and under his supervision. Defendant La Jolla Church knew these  
10 representations to be false.

11 10.4. Defendant La Jolla Church had sole knowledge of Perpetrator' history of sexually  
12 abusing children. As a result of Defendant La Jolla Church's affirmative and active conduct  
13 in suppressing information relating to Perpetrator' sexual abuse of children, such facts  
14 were not known or reasonably discoverable to Plaintiff Joel Gamboa.

15 10.5. By virtue of their superior knowledge of Perpetrator' past history of sexually abusing  
16 minors, and active conduct in preventing Plaintiff Joel Gamboa from ascertaining similar  
17 knowledge, Defendant La Jolla Church assumed obligations to warn and or disclose the  
18 danger posed by Perpetrator to Plaintiff Joel Gamboa and other parishioners.

19 10.6. Defendant La Jolla Church, having knowledge of the high rates of recidivism among  
20 individuals who commit childhood sexual abuse, and with knowledge that Perpetrator had  
21 repeatedly engaged in acts of childhood sexual abuse even after being reprimanded and  
22 reproved by Defendant La Jolla Church, retained Perpetrator in a leadership position with  
23 Defendant La Jolla Church where he had access to children in conscious disregard of the  
24 substantial likelihood that minor parishioners would be sexually abused as a result of its  
25 actions. Defendant La Jolla Church fraudulently, intentionally and knowingly breached its  
26 obligation by not warning Plaintiff Joel Gamboa of the risk posed by Perpetrator.

27 10.7. Defendant La Jolla Church affirmatively misrepresented to Plaintiff John Dorman in  
28 approximately 1995 that the statute of limitations for both a criminal action against

1 Perpetrator and a civil case resulting from the abuse had expired, and that no legal action  
2 could be taken by Plaintiff John Dorman.

3 10.8. This representation was false when made since Plaintiff John Dorman had not  
4 reached the age of majority and the civil statute of limitations had not even commenced  
5 running. Defendant La Jolla Church and its agent and representatives knew this statement  
6 to be false when uttered.

7 10.9. Plaintiff John Dorman reasonably relied on the statement to his detriment.

8 11. The sexual abuse and exploitation of Plaintiff John Dorman and the circumstances  
9 under which it occurred caused Plaintiff John Dorman to develop various psychological  
10 coping mechanisms which reasonably made him incapable of ascertaining the resulting  
11 damages from that conduct, or the wrongfulness of Perpetrator' conduct. Plaintiff John  
12 Dorman did not begin to discover the causal relationship between the molestation and  
13 adulthood psychological injuries until after the birth of his son in 2008. Thus, within the  
14 three years prior to the filing of this Complaint, Plaintiff discovered that the psychological  
15 injury or illness occurring after the age of majority was caused by the sexual abuse.

16 11.1. The sexual abuse and exploitation of Plaintiff Joel Gamboa and the circumstances  
17 under which it occurred caused Plaintiff Joel Gamboa to develop various psychological  
18 coping mechanisms which reasonably made him incapable of ascertaining the resulting  
19 damages from that conduct, or the wrongfulness of Perpetrator' conduct. In approximately  
20 2008 or 2009, Plaintiff Joel Gamboa learned that Perpetrator was still associated with, and  
21 attending Jehovah's Witness services in the San Diego area. At that time, Joel was forced  
22 to revisit his victimization by Perpetrator, and discovered, for the first time, that  
23 psychological injuries occurring during his adulthood were caused by the molestation by  
24 Perpetrator. Thus, within the three years prior to the filing of this Complaint, Plaintiff  
25 discovered that the psychological injury or illness occurring after the age of majority was  
26 caused by the sexual abuse.

27  
28  
///



1 **FIRST CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
4 **Supervisory Organization and Does 5 through 100; Plaintiff Joel Gamboa Against**  
5 **Defendant Linda Vista Congregation, Defendant La Jolla Congregation, Defendant**  
6 **Supervisory Organization, and Does 5 through 100)**

7 12. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

8 13. Defendants had a duty to protect the minor Plaintiffs when they were entrusted to  
9 their care by Plaintiffs' parents. Plaintiffs' care, welfare, and/or physical custody was  
10 temporarily entrusted to Defendants. Defendants voluntarily accepted the entrusted care  
11 of Plaintiffs. As such, Defendants owed Plaintiffs, minor children, a special duty of care, in  
12 addition to a duty of ordinary care, and owed Plaintiffs the higher duty of care that adults  
13 dealing with children owe to protect them from harm.

14 14. Defendants, by and through their agents, servants and employees, knew or  
15 reasonably should have known of the Perpetrator's dangerous and exploitive propensities  
16 and/or that the Perpetrator was an unfit agent. It was foreseeable that if Defendants did  
17 not adequately exercise or provide the duty of care owed to children in their care, including  
18 but not limited to Plaintiffs, the children entrusted to Defendants' care would be vulnerable  
19 to sexual abuse by the Perpetrator.

20 15. Defendants breached their duty of care to the minor Plaintiffs by allowing the  
21 Perpetrator to come into contact with the minor Plaintiffs without supervision; by failing to  
22 adequately hire, supervise, or retain the Perpetrator who they permitted and enabled to  
23 have access to Plaintiffs; by failing to investigate or otherwise confirm or deny such facts  
24 about the Perpetrator; by failing to tell or concealing from Plaintiffs, Plaintiffs' parents,  
25 guardians, or law enforcement officials that the Perpetrator was or may have been sexually  
26 abusing minors; by failing to tell or concealing from Plaintiffs' parents, guardians, or law  
27 enforcement officials that Plaintiffs were or may have been sexually abused after  
28 Defendants knew or had reason to know that the Perpetrator may have sexually abused

1 Plaintiffs, thereby enabling Plaintiffs to continue to be endangered and sexually abused,  
2 and/or creating the circumstance where Plaintiffs were less likely to receive medical/mental  
3 health care and treatment, thus exacerbating the harm done to Plaintiffs; and/or by holding  
4 out the Perpetrator to the Plaintiffs and their parents or guardians as being in good  
5 standing and trustworthy. Defendants cloaked within the facade of normalcy Defendants'  
6 and/or the Perpetrator's contact and/or actions with the Plaintiffs and/or with other minors  
7 who were victims of the Perpetrator, and/or disguised the nature of the sexual abuse and  
8 contact.

9 16. As a result of the above-described conduct, Plaintiffs have suffered, and continue to  
10 suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
11 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
12 enjoyment of life; have suffered and continue to suffer spiritually; were prevented and will  
13 continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
14 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
15 capacity; and/or have incurred and will continue to incur expenses for medical and  
16 psychological treatment, therapy, and counseling.

17 **SECOND CAUSE OF ACTION**

18 **NEGLIGENT SUPERVISION/FAILURE TO WARN**

19 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
20 **Supervisory Organization and Does 5 through 100; Plaintiff Joel Gamboa Against**  
21 **Defendant Linda Vista Congregation, Defendant La Jolla Congregation, Defendant**  
22 **Supervisory Organization, and Does 5 through 100)**

23 17. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

24 18. Defendants had a duty to provide reasonable supervision of the Perpetrator; to use  
25 reasonable care in investigating the Perpetrator; and to provide adequate warning to the  
26 Plaintiffs, the Plaintiffs' families, minor students, and minor parishioners of the  
27 Perpetrator's dangerous propensities and unfitness.

28 19. Defendants, by and through their agents, servants and employees, knew or

1 reasonably should have known of the Perpetrator's dangerous and exploitive propensities  
2 and/or that the Perpetrator was an unfit agent. Despite such knowledge, Defendants  
3 negligently failed to supervise the Perpetrator in the position of trust and authority as a  
4 Jehovah's Witness speaker, ministerial servant, Elder, religious instructor, counselor,  
5 surrogate parent, spiritual mentor, emotional mentor, and/or other authority figure, where  
6 he was able to commit the wrongful acts against the Plaintiffs. Defendants failed to provide  
7 reasonable supervision of the Perpetrator, failed to use reasonable care in investigating the  
8 Perpetrator, and failed to provide adequate warning to Plaintiffs and Plaintiffs' families of  
9 the Perpetrator's dangerous propensities and unfitness. Defendants further failed to take  
10 reasonable measures to prevent future sexual abuse.

11 20. As a result of the above-described conduct, Plaintiffs have suffered, and continue to  
12 suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
13 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
14 enjoyment of life; have suffered and continue to suffer spiritually; were prevented and will  
15 continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
16 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
17 capacity; and/or have incurred and will continue to incur expenses for medical and  
18 psychological treatment, therapy, and counseling.

19 **THIRD CAUSE OF ACTION**

20 **NEGLIGENT HIRING/RETENTION**

21 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
22 **Supervisory Organization and Does 5 through 100; Plaintiff Joel Gamboa Against**  
23 **Defendant Linda Vista Congregation, Defendant La Jolla Congregation, Defendant**  
24 **Supervisory Organization, and Does 5 through 100)**

25 21. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

26 22. Defendants had a duty to not hire and/or retain the Perpetrator, and other  
27 employees, agents, volunteers, and other representatives, given the Perpetrator's  
28 dangerous and exploitive propensities.

1 23. Defendant La Jolla Church, Defendant Linda Vista Church, Defendant Supervisory  
2 Organization and Does 5 through 100, by and through their agents, servants and  
3 employees, knew or reasonably should have known of the Perpetrator's dangerous and  
4 exploitive propensities and/or that the Perpetrator was an unfit agent. Despite such  
5 knowledge, Defendants negligently hired and/or retained the Perpetrator in the position of  
6 trust and authority as a Jehovah's Witness speaker, ministerial servant, Elder, religious  
7 instructor, counselor, surrogate parent, spiritual mentor, emotional mentor, and/or other  
8 authority figure, where he was able to commit the wrongful acts against the Plaintiffs.  
9 Defendants failed to use reasonable care in investigating the Perpetrator and failed to  
10 provide adequate warning to Plaintiffs and Plaintiffs' families of the Perpetrator's  
11 dangerous propensities and unfitness. Defendants further failed to take reasonable  
12 measures to prevent future sexual abuse.

13 24. As a result of the above-described conduct, Plaintiffs have suffered, and continue to  
14 suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
15 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
16 enjoyment of life; have suffered and continue to suffer spiritually; were prevented and will  
17 continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
18 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
19 capacity; and/or have incurred and will continue to incur expenses for medical and  
20 psychological treatment, therapy, and counseling.

21 **FOURTH CAUSE OF ACTION**

22 **REMOVED**

23 25. REMOVED

24 26. REMOVED

25 27. REMOVED

26 28. REMOVED

27 29. REMOVED

28 30. REMOVED

1 31. REMOVED

2 32. REMOVED

3 **FIFTH CAUSE OF ACTION**

4 **NEGLIGENT FAILURE TO WARN, TRAIN, OR EDUCATE PLAINTIFF**

5 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
6 **Supervisory Organization and Does 5 through 100; Plaintiff Joel Gamboa Against**  
7 **Defendant Linda Vista Congregation, Defendant La Jolla Congregation, Defendant**  
8 **Supervisory Organization, and Does 5 through 100)**

9 33. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

10 34. Defendants breached their duty to take reasonable protective measures to protect  
11 Plaintiffs and other minor parishioners and/or students from the risk of childhood sexual  
12 abuse by the Perpetrator, such as the failure to properly warn, train, or educate Plaintiffs  
13 and other minor parishioners and/or students about how to avoid such a risk, pursuant to  
14 Juarez v. Boy Scouts of America, Inc., 97 Cal.Rptr.2d 12, 81 Cal.App.4th 377 (2000).

15 35. As a result of the above-described conduct, Plaintiffs have suffered, and continue to  
16 suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
17 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
18 enjoyment of life; have suffered and continue to suffer spiritually; were prevented and will  
19 continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
20 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
21 capacity; and/or have incurred and will continue to incur expenses for medical and  
22 psychological treatment, therapy, and counseling.

23 **SIXTH CAUSE OF ACTION**

24 **REMOVED**

25 36. REMOVED

26 37. REMOVED

27 38. REMOVED

28 39. REMOVED

1 **SEVENTH CAUSE OF ACTION**

2 **REMOVED**

3 40. REMOVED

4 41. REMOVED

5 42. REMOVED

6 43. REMOVED

7 44. REMOVED

8 **EIGHTH CAUSE OF ACTION**

9 **SEXUAL BATTERY (Civil Code § 1708.5)**

10 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
11 **Supervisory Organization, Defendant Perpetrator and Does 5 through 100; Plaintiff**  
12 **Joel Gamboa Against Defendant Linda Vista Congregation, Defendant La Jolla**  
13 **Congregation, Defendant Supervisory Organization, Defendant Perpetrator and Does**  
14 **5 through 100)**

15 45. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

16 46. From approximately 1983 to 1985, the Perpetrator engaged in unpermitted, harmful  
17 and offensive sexual contact upon the person of Plaintiff John Dorman, and Defendant La  
18 Jolla Church, Defendant Linda Vista Church, Defendant Supervisory Organization and  
19 Does 5 through 100 ratified or approved of that sexual contact.

20 47. From approximately 1988 to approximately 1995, the Perpetrator engaged in  
21 unpermitted, harmful and offensive sexual contact upon the person of Plaintiff Joel  
22 Gamboa, and Defendant La Jolla Church, Defendant Linda Vista Church, Defendant  
23 Supervisory Organization and Does 5 through 100 ratified or approved of that sexual  
24 contact.

25 48. As a result of the above-described conduct, Plaintiffs have suffered, and continue to  
26 suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
27 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
28 enjoyment of life; have suffered and continue to suffer spiritually; were prevented and will

1 continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
2 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
3 capacity; and/or have incurred and will continue to incur expenses for medical and  
4 psychological treatment, therapy, and counseling. Pursuant to Civil Code § 1708.5(c),  
5 Plaintiffs are also entitled to injunctive relief for this cause of action pursuant, in which the  
6 Perpetrator is enjoined from committing further acts of sexual battery.

7 **NINTH CAUSE OF ACTION**

8 **SEXUAL HARASSMENT**

9 **(Plaintiff John Dorman Against Defendants Linda Vista Church, Defendant**  
10 **Perpetrator and Does 5 through 100; Plaintiff Joel Gamboa Against Defendant La**  
11 **Jolla Church, Defendant Linda Vista Church, Defendant Perpetrator and Does 5**  
12 **through 100)**

13 49. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

14 50. During Plaintiff John Dorman's time as a congregant, church member and student at  
15 Defendant La Jolla Church, Perpetrator intentionally, recklessly and wontonly made sexual  
16 advances, sexual solicitations, sexual comments and sexual requests and engaged in  
17 other visual, verbal or physical conduct of a sexual nature based on Plaintiff John  
18 Dorman's gender that were unwelcome, pervasive and severe, including but not limited to  
19 engaging in sexual talk with John Dorman and touching John Dorman in a sexually  
20 motivated and illegal manner, all while Perpetrator was acting in the course and scope of  
21 his agency with Defendant La Jolla Church and Does 5 through 100.

22 51. During Plaintiff Joel Gamboa's time as a congregant, church member and student at  
23 Defendant Linda Vista Church, Perpetrator intentionally, recklessly and wontonly made  
24 sexual advances, sexual solicitations, sexual comments and sexual requests and engaged  
25 in other visual, verbal or physical conduct of a sexual nature based on Plaintiff Joel  
26 Gamboa's gender that were unwelcome, pervasive and severe, including but not limited to  
27 engaging in sexual talk with Joel Gamboa and touching Joel Gamboa in a sexually  
28 motivated and illegal manner, all while Perpetrator was acting in the course and scope of

1 his agency with Defendant Linda Vista Church and Does 5 through 100.

2 52. The incidents of sexual misconduct and sexual harassment outlined herein took  
3 place while Plaintiff John Dorman was under the control of Perpetrator, in his capacity as a  
4 ministerial servant, teacher and speaker at Defendant La Jolla Church and while  
5 specifically acting on behalf of the Defendant La Jolla Church and Does 5 through 100.

6 53. The incidents of sexual misconduct and sexual harassment outlined herein took  
7 place while Plaintiff Joel Gamboa was under the control of Perpetrator, in his capacity as a  
8 ministerial servant, teacher and speaker at Defendant La Jolla Church, and while  
9 specifically acting on behalf of the Defendant La Jolla Church, Defendant Linda Vista  
10 Church and Does 5 through 100.

11 54. During Plaintiff John Dorman's time as a church member, congregant and student at  
12 Defendant La Jolla Church, Perpetrator intentionally, recklessly and wantonly did acts  
13 which resulted in harmful and offensive contact with intimate parts of Plaintiff John  
14 Dorman's person, including but not limited to, using his position as a ministerial servant,  
15 teacher and speaker to require Plaintiff John Dorman to give into his sexual suggestions,  
16 and used his authority and position of trust to exploit John Dorman physically, sexually and  
17 emotionally.

18 55. During Plaintiff Joel Gamboa's time as a church member, congregant and student at  
19 Defendant Linda Vista Church, Perpetrator intentionally, recklessly and wantonly did acts  
20 which resulted in harmful and offensive contact with intimate parts of Plaintiff Joel  
21 Gamboa's person, including but not limited to, using his position as a ministerial servant,  
22 teacher and speaker to require Plaintiff Joel Gamboa to give into his sexual suggestions,  
23 and used his authority and position of trust to exploit Joel Gamboa physically, sexually and  
24 emotionally.

25 56. Because of Plaintiff John Dorman's relationship with Perpetrator, Plaintiff John  
26 Dorman's young age as a minor congregant and student, and Plaintiff John Dorman's  
27 inexperience, Plaintiff John Dorman was emotionally unable to terminate the contact he  
28 had with Perpetrator.



1 57. Because of Plaintiff Joel Gamboa's relationship with Perpetrator, Plaintiff Joel  
2 Gamboa's young age as a congregant and student, and Plaintiff Joel Gamboa's  
3 inexperience, Plaintiff Joel Gamboa was emotionally unable to terminate the contact he  
4 had with Perpetrator.

5 58. Because of Perpetrator' position of authority over Plaintiff John Dorman, Plaintiff  
6 John Dorman's mental and emotional state, and Plaintiff John Dorman's young age under  
7 the age of consent, Plaintiff John Dorman was unable to, and did not, give meaningful  
8 consent to such acts.

9 59. Because of Perpetrator' position of authority over Plaintiff Joel Gamboa, Plaintiff  
10 Joel Gamboa's mental and emotional state, and Plaintiff Joel Gamboa's young age under  
11 the age of consent, Plaintiff Joel Gamboa was unable to, and did not, give meaningful  
12 consent to such acts.

13 60. Even though Defendant La Jolla Church, Defendant Linda Vista Church and Does 5  
14 through 100 knew or should have known of these activities by Perpetrator, Defendant La  
15 Jolla Church, Defendant Linda Vista Church and Does 5 through 100 did nothing to  
16 investigate, supervise or monitor Perpetrator to ensure the safety of the minor students and  
17 choir members.

18 61. Defendant La Jolla Church, Defendant Linda Vista Church and Does 5 through  
19 100's conduct was a breach of their duties to Plaintiffs.

20 63. As a result of the above-described conduct, Plaintiffs have suffered and will continue  
21 to suffer great pain of mind and body, shock, emotional distress, physical manifestations of  
22 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of  
23 enjoyment of life; have suffered and will continue to suffer spiritually; were prevented and  
24 will continue to be prevented from performing Plaintiffs' daily activities and obtaining the full  
25 enjoyment of life; have sustained and will continue to sustain loss of earnings and earning  
26 capacity; and/or have incurred and will continue to incur expenses for medical and  
27 psychological treatment, therapy, and counseling.

28

1 **TENTH CAUSE OF ACTION**

2 **BREACH OF FIDUCIARY DUTY AND/OR CONFIDENTIAL RELATIONSHIP**

3 **(Plaintiff John Dorman Against Defendant Linda Vista Congregation, Defendant**  
4 **Supervisory Organization, Defendant Perpetrator and Does 5 through 100; Plaintiff**  
5 **Joel Gamboa Against Defendant Linda Vista Congregation, Defendant La Jolla**  
6 **Congregation, Defendant Supervisory Organization, Defendant Perpetrator and Does**  
7 **5 through 100)**

8 64. Plaintiffs incorporate all paragraphs of this Complaint as if fully set forth herein.

9 65. Because of Plaintiffs' young ages, and because of the status of the Perpetrator as  
10 an authority figure to Plaintiffs, Plaintiffs were vulnerable to the Perpetrator. The  
11 Perpetrator sought Plaintiffs out, and was empowered by and accepted Plaintiffs'  
12 vulnerability. Plaintiffs' vulnerability also prevented Plaintiffs from effectively protecting  
13 themselves.

14 66. By holding the Perpetrator out as a qualified pioneer, preacher, bible study teacher,  
15 ministerial servant, counselor, surrogate parent, spiritual mentor, emotional mentor, elder  
16 and/or any other authority figure, and by undertaking the religious and/or secular instruction  
17 and spiritual and/or emotional counseling of Plaintiffs, Defendants entered into a fiduciary  
18 and/or confidential relationship with the minor Plaintiffs.

19 67. Defendants and each of them breached their fiduciary duty to Plaintiffs by engaging  
20 in the negligent and wrongful conduct described herein.

21 68. As a direct result of Defendants' breach of their fiduciary duty, Plaintiffs have  
22 suffered, and continue to suffer great pain of mind and body, shock, emotional distress,  
23 physical manifestations of emotional distress, embarrassment, loss of self-esteem,  
24 disgrace, humiliation, and loss of enjoyment of life; have suffered and continue to suffer  
25 spiritually; were prevented and will continue to be prevented from performing Plaintiffs'  
26 daily activities and obtaining the full enjoyment of life; have sustained and will continue to  
27 sustain loss of earnings and earning capacity; and/or have incurred and will continue to  
28 incur expenses for medical and psychological treatment, therapy, and counseling.

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WHEREFORE, Plaintiffs pray for damages; costs; interest; statutory/civil penalties according to law; punitive damages against all Defendants; attorney's fees and such other relief as the court deems appropriate and just.

**JURY DEMAND**

Plaintiffs demand a jury trial on all issues so triable.

THE ZALKIN LAW FIRM, P.C.

Dated: 10-13-11

By:   
Devin M. Storey  
Attorney for Plaintiffs