

Reference Document

"How Watchtower Spent 25 Years Making Sure the Elder Goes to Prison Instead"

Every Claim, Source, and Verification Status

How to Use This Document

Each entry identifies a specific factual claim made in the video, the source it is based on, where to verify it, and any notes on confidence level. Claims are organized in the order they appear in the video.

Verification levels:

- **PRIMARY** — Sourced from court rulings, legislation, official Watchtower publications (including internal manuals like *Shepherd the Flock of God*), Ninth Circuit opinions, state Supreme Court opinions, federal court dockets, and government records (Pennsylvania Office of Attorney General press releases, Australian Royal Commission reports, etc.). Primary sources can stand on their own.
- **SECONDARY** — Sourced from established advocacy or legal-resource sites, academic researchers, plaintiff-counsel firms hosting case documents, or reputable investigative journalism (*Christianity Today*, AP, regional papers of record). Secondary sources support claims and are most defensible when paired with a primary or another independent secondary.

SECTION 1: Nunez v. Watchtower

Claim: In 2004, an elder in the Thompson Falls, Montana, congregation phoned Watchtower's legal department in New York after learning of child sexual abuse. The Watchtower attorney told him Montana law did not require him to report; the elder did not contact the police; the abuse continued.

- **Source:** Montana Supreme Court, *Nunez v. Watch Tower Bible and Tract Society of New York, Inc.*, 2020 MT 3, DA 19-0077 (Jan. 8, 2020).
- **URL:** <https://law.justia.com/cases/montana/supreme-court/2020/da-19-0077-0.html>
- **Verification:** PRIMARY — Published Montana Supreme Court opinion.
- **Note:** The opinion records that the elders contacted the Watchtower legal department, received advice consistent with not reporting, formed a judicial committee, disfellowshipped the abuser, later reinstated him, and did not contact local police. Names cited in the video — Don Herberger, Maximo Reyes, Holly, Peter, and Alexis ("Lexi") Nunez — are drawn from the published record and contemporaneous coverage.

SECTION 2: The 2000 Corporate Reorganization

Claim: In October 2000, Watchtower formed three new corporations: the Christian Congregation of Jehovah's Witnesses (CCJW), the Religious Order of Jehovah's Witnesses (RoJW), and Kingdom Support Services. The official explanation framed it as administrative — growth, efficiency, and allowing senior ministers who were not Governing Body members to serve as corporate officers.

- **Source:** Mark A. Kellner, "Sects: Watch Tower Undergoes Corporate Shakeup," *Christianity Today*, March 5, 2001.
- **URL:** <https://www.christianitytoday.com/2001/03/sects-watch-tower-undergoes-corporate-shakeup/>
- **Verification:** SECONDARY — Reputable contemporaneous reporting in a national religious-affairs publication. The reorganization itself is documented in subsequent court filings and in Watchtower corporate records, making this a well-corroborated secondary.
- **Note:** The article identifies Watchtower spokesman James N. Pellechia as the source for the "administrative growth and efficiency" framing.

Claim: In the same article, Randall Watters — described by *Christianity Today* as a former employee and elder at the group's Bethel headquarters in Brooklyn — characterized the reorganization as a liability-isolation strategy.

- **Source:** Mark A. Kellner, "Sects: Watch Tower Undergoes Corporate Shakeup," *Christianity Today*, March 5, 2001.
- **URL:** <https://www.christianitytoday.com/2001/03/sects-watch-tower-undergoes-corporate-shakeup/>
- **Verification:** SECONDARY — Quote sourced from *Christianity Today* verbatim.
 - **Key quote:** "They're trying to become less hierarchical, to keep liability at [a] lower level. They think when lawsuits come, they can isolate particular committees."

Claim: Raymond Franz — a former member of the Governing Body who left the religion and wrote about it — observed that Bethel workers signed a vow of poverty under the new structure, reclassifying them as something other than employees. The change followed a German court order requiring Watchtower to provide severance pay to staff treated as employees under local law.

- **Source:** Mark A. Kellner, "Sects: Watch Tower Undergoes Corporate Shakeup," *Christianity Today*, March 5, 2001.
- **URL:** <https://www.christianitytoday.com/2001/03/sects-watch-tower-undergoes-corporate-shakeup/>
- **Verification:** SECONDARY — Franz's comments to *Christianity Today*.
 - **Key quote:** "in Germany, the government ordered the Witnesses to provide severance pay to staff members. Now when people apply [to join the staff], they sign a vow of poverty, which frees [the WTBS] from having to treat the person as an employee."

SECTION 3: Padron v. Watchtower (California)

Claim: In *Padron v. Watch Tower Bible and Tract Society of New York*, the trial court ordered Watchtower to produce records of accused child abusers. Watchtower produced records up to March 2001 and argued the post-2001 records belonged to a separate corporation (CCJW) and were therefore beyond its production obligation.

- **Source:** *Padron v. Watch Tower Bible and Tract Society of New York*, California Court of Appeal (opinion published in 2017).
- **URL:** <https://caselaw.findlaw.com/court/ca-court-of-appeal/1879521.html>
- **Verification:** PRIMARY — Published California Court of Appeal opinion.

Claim: The court rejected Watchtower's position as discovery gamesmanship. Discovery sanctions of \$4,000 per day were imposed; the total exceeded \$2 million.

- **Source:** *Padron v. Watch Tower Bible and Tract Society of New York*, California Court of Appeal (2017); see also Leagle archive of related orders.
- **URL:** <https://www.leagle.com/decision/incaco20171109036>
- **Verification:** PRIMARY — Court opinion records the sanctions framework. The cumulative dollar amount is documented in case-tracking summaries by ClassAction.com and other litigation reporters covering the case.

SECTION 4: The 1997 Letter and the Database

Claim: In a letter dated March 14, 1997, Watchtower's Service Department directed all bodies of elders in the United States to report members accused of child sexual abuse to headquarters by mailing a form in a designated blue envelope. The reports formed the basis of an internal database of accused abusers.

- **Source:** EJ Dickson, "Jehovah's Witnesses Accused of Mishandling Child Sexual Abuse Claims," *Rolling Stone*, March 22, 2019; Steven Unthank, submission to the New York State Attorney General (April 2024), Annexure A: Watchtower New York letter dated March 14, 1997.
- **URL:** <https://www.rollingstone.com/culture/culture-news/jehovahs-witnesses-child-sexual-abuse-811927/>
- **Verification:** SECONDARY — *Rolling Stone* investigative reporting summarizing the letter and its effect; the Unthank submission attaches the letter itself as Annexure A.
- **Note:** The letter is also referenced extensively in *Padron* and *Caekaert* case filings as a foundational document of the reporting database.

SECTION 5: Shepherd the Flock of God (the Elders' Manual)

Claim: *Shepherd the Flock of God* is the confidential elders' manual issued by Watchtower. It has been issued in editions dated 2010, 2019, 2020, 2024, and September 1, 2025. The predecessor manual, *Pay Attention to Yourselves and to All the Flock*, was first published in 1977.

- **Source:** JWfacts research database on *Shepherd the Flock of God* editions; AvoidJW analysis of the September 1, 2025 leaked edition.
- **URL:** <https://jwfacts.com/watchtower/elders-manual-shepherd-secret.php>
- **Verification:** SECONDARY — The manual itself is internal Watchtower property; the editions and dates are documented through advocacy-research aggregation of leaked copies and Watchtower's own distribution announcements to elders.
- **Note:** The 2010 edition is also archived on third-party document repositories. The September 1, 2025 leaked edition is documented at AvoidJW:
<https://avoidjw.org/news/shepherd-flock-of-god-elders-rulebook-manual-doctrine/>

Claim: A formal letter to all bodies of elders dated October 7, 2010 lays out the binding and handling rules for *Shepherd the Flock of God*, including that sisters and non-Witnesses are not permitted to bind or laminate the textbook even under supervision.

- **Source:** JWfacts research database, "Secret Elder's Manual — Shepherd the Flock of God."
- **URL:** <https://jwfacts.com/watchtower/elders-manual-shepherd-secret.php>
- **Verification:** SECONDARY — Advocacy research site that reproduces the relevant directive from the October 7, 2010 letter.
 - **Key quote:** "There is no objection if an elder personally spiral binds or laminates his own textbook or does so for other elders."

Claim: Across all editions of *Shepherd the Flock of God*, when an elder learns of a serious congregational matter — including allegations of child sexual abuse — the manual's instruction is to contact the branch office first.

- **Source:** "A Brutal Breakdown of the Elders Rulebook," AvoidJW (Sept. 14, 2025), summarizing the consistent procedural framework across editions; cross-checked against published copies of the 2010 and 2020 editions.
- **URL:** <https://avoidjw.org/news/shepherd-flock-of-god-elders-rulebook-manual-doctrine/>
- **Verification:** SECONDARY — Advocacy analysis with direct manual citations.

SECTION 6: Caekaert v. Watchtower — Federal Court Findings

Claim: *Caekaert v. Watchtower Bible and Tract Society of New York, Inc.*, U.S. District Court for the District of Montana, Billings Division, Case No. 1:20-cv-00052, was filed April 24, 2020. Plaintiffs Tracy Caekaert and Camilla Mapley sued Watchtower of New York, Watch Tower of Pennsylvania, and Bruce Mapley Sr. The case was assigned to Judge Susan P. Watters.

- **Source:** CourtListener docket for *Caekaert v. Watchtower*, 1:20-cv-00052 (D. Mont.).
- **URL:** <https://www.courtlistener.com/docket/17099295/caekaert-v-watchtower-bible-and-tract-society-of-new-york-inc/>
- **Verification:** PRIMARY — Federal court docket.

Claim: Watch Tower of Pennsylvania filed a motion to dismiss for lack of personal jurisdiction. In support of the motion, Watchtower's general counsel Philip Brumley filed two sworn affidavits asserting that WTPA's role was limited to copyright holding and humanitarian aid, with no operational involvement in local Witness congregations.

- **Source:** *Caekaert v. Watchtower*, Doc. 14-1 (Affidavit of Philip Brumley, June 22, 2020), hosted by JWChildAbuse.org.
- **URL:** <https://www.jwchildabuse.org/document/14-1-affidavit-of-philip-brumley/>
- **Verification:** PRIMARY — Federal court filing.

Claim: Judge Susan P. Watters found that Brumley's affidavits were filed with reckless disregard for the truth and imposed sanctions of \$154,448.11 personally against Brumley under 28 U.S.C. § 1927.

- **Source:** *Caekaert v. Watchtower*, Doc. 135 (Order on Motion for Sanctions, August 23, 2022) and Doc. 219 (Order Awarding Fees of \$154,448.11, April 14, 2023), hosted by JWChildAbuse.org.
- **URL:** <https://www.jwchildabuse.org/document/court-order-on-sanctions-against-philip-brumley/>
- **Verification:** PRIMARY — Federal district court orders.

Claim: On July 7, 2025, the U.S. Court of Appeals for the Ninth Circuit affirmed the district court's sanctions against Brumley.

- **Source:** *Rowland v. Watch Tower Bible & Tract Society of Pennsylvania*, No. 24-5196 (consolidated with No. 24-5200, *Caekaert*), Ninth Circuit Court of Appeals, July 7, 2025.
- **URL:** <https://cdn.ca9.uscourts.gov/datastore/opinions/2025/07/07/24-5196.pdf>
- **Verification:** PRIMARY — Published Ninth Circuit opinion.
 - **Key quote:** *"his conduct demonstrated at [a] minimum, a reckless disregard for providing an accurate and truthful accounting of WTPA's role."*

Claim: A separate finding in the same case held that Watchtower of New York had engaged in spoliation of evidence. The court was prepared to instruct the jury that they could infer Watchtower had intentionally destroyed key documents, prior to settlement.

- **Source:** *Caekaert v. Watchtower*, Doc. 410 (Order on Sanctions for Watchtower New York Spoliation of Evidence, June 10, 2024), hosted by JWChildAbuse.org.
- **URL:** <https://www.jwchildabuse.org/document/410-0-order-on-sanctions-for-watchtower-new-york-spoliation-of-evidence/>
- **Verification:** PRIMARY — Federal district court order.

Claim: On June 22, 2020, Watchtower of New York filed a cross-claim against its own co-defendant, Bruce Mapley Sr., in the same litigation. The case caption reads: "Watchtower Bible and Tract Society of New York, Inc., Cross-Claimant, v. Bruce Mapley Sr., Cross-Claim Defendant."

- **Source:** CourtListener docket entry, June 22, 2020 ("ANSWER to 1 Complaint, with Jury Demand, CROSSCLAIM against Bruce Mapley, Sr by Watchtower Bible and Tract Society of New York, Inc.").
- **URL:** <https://www.courtlistener.com/docket/17099295/caekaert-v-watchtower-bible-and-tract-society-of-new-york-inc/>
- **Verification:** PRIMARY — Federal court docket entry.

SECTION 7: The Hawaii Apana Case

Claim: In 2023, a Hawaii Circuit Court awarded \$40 million (\$15M compensatory + \$25M punitive) to a survivor abused at age twelve in 1992 by Keneth L. Apana, an elder of the Makaha Congregation of Jehovah's Witnesses. The verdict held Apana personally accountable for the full amount.

- **Source:** *N.D. v. Makaha Congregation of Jehovah's Witnesses, et al.*, Case No. 1CCV-20-0000390, Hawaii Circuit Court (Findings of Fact and Conclusions of Law and Order, July 18, 2023, before Judge Dean Ochiai); hosted by Davis Levin Livingston (plaintiff's counsel).
- **URL:** <https://www.davislevin.com/documents/673-FOF-COL-Order.pdf>
- **Verification:** PRIMARY — Court order from the trial judge, hosted by counsel of record.
- **Note:** The case caption spells the defendant's name "Keneth L. Apana" with a single 'n'; news outlets often modernize to "Kenneth."

Claim: Court records and contemporaneous reporting confirm that claims against the Watchtower organization itself in the same matter resolved by confidential settlement on January 30, 2023 — before the damages trial against Apana.

- **Source:** Davis Levin Livingston (plaintiff's counsel), "Circuit Court Awards \$40 Million to Childhood Sex Abuse Victim," July 2023.
- **URL:** <https://www.davislevin.com/blog/2023/july/circuit-court-awards-40-million-to-childhood-sex/>
- **Verification:** PRIMARY — Statement from counsel of record, paired with the court order above.

SECTION 8: The Pennsylvania Attorney General Investigation

Claim: Since 2022, the Pennsylvania Office of the Attorney General has operated a statewide investigating grand jury into child sexual abuse within Jehovah's Witness congregations. As of mid-2025, the grand jury has produced charges against at least seventeen members of Jehovah's Witnesses in Pennsylvania.

- **Source:** Pennsylvania Office of Attorney General, press release on charges against Timothy Willochell (Westmoreland County), July 2025.
- **URL:** <https://www.attorneygeneral.gov/taking-action/westmoreland-co-man-allegedly-abused-2-children-charges-result-from-grand-jury-investigation-of-jehovahs-witnesses-congregation-members/>
- **Verification:** PRIMARY — Official Pennsylvania OAG press release.
 - **Key quote:** "Willochell is the 17th member of the Jehovah's Witnesses charged by the Office of Attorney General — following grand jury presentments — since 2022."

Claim: Norman Aviles-Garriga, a former Jehovah's Witness elder in Lancaster County, was sentenced November 2024 to 11.5 to 23 years in state prison for the sexual abuse of three children.

- **Source:** Pennsylvania Office of Attorney General, press release dated November 1, 2024.
- **URL:** <https://www.attorneygeneral.gov/taking-action/verdict-former-jehovahs-witnesses-elder-convicted-of-sexual-abuse-of-3-children/>
- **Verification:** PRIMARY — Official Pennsylvania OAG release.

Claim: Luis Manuel Ayala-Velasquez of Reading, Pennsylvania, was sentenced July 2024 to 14 to 46 years in state prison after pleading guilty to five felony counts including rape of an unconscious person.

- **Source:** Pennsylvania Office of Attorney General, press release dated July 3, 2024.
- **URL:** <https://www.attorneygeneral.gov/taking-action/reading-man-jailed-up-to-46-years-for-sexual-abuse-of-child-charged-after-grand-jury-investigation-of-jehovahs-witnesses-congregation-members/>
- **Verification:** PRIMARY — Official Pennsylvania OAG release.

Claim: Marc Brown of Allegheny County, Pennsylvania, was sentenced March 2025 to 12 to 30 years in state prison after pleading guilty to felony counts of involuntary deviate sexual intercourse, aggravated indecent assault, and endangering the welfare of children.

- **Source:** Pennsylvania Office of Attorney General, press release dated March 28, 2025.
- **URL:** <https://www.attorneygeneral.gov/taking-action/allegheny-county-man-jailed-up-to-30-years-for-repeated-sexual-abuse-of-2-children-charged-after-grand-jury-investigation-of-jehovahs-witnesses-congregation-members/>
- **Verification:** PRIMARY — Official Pennsylvania OAG release.

SECTION 9: The Australian Royal Commission Findings

Claim: In 2015, the Australian Royal Commission into Institutional Responses to Child Sexual Abuse obtained the Australian Watchtower branch's complete internal abuse records — and found 1,006 alleged perpetrators of child sexual abuse, more than 1,800 victims, dating back to 1950. Not one of those perpetrators had been reported by the organization to police.

- **Source:** Royal Commission into Institutional Responses to Child Sexual Abuse (Australia), Case Study 29: "The response of the Jehovah's Witnesses and Watchtower Bible and Tract Society of Australia Ltd to allegations of child sexual abuse" (October 2016 report).
- **URL:** <https://www.abuseincare.org.nz/our-research/library/v/300/case-study-29-the-response-of-the-jehovahs-witnesses-and-watchtower-bible-and-tract-society-of-australia-ltd>
- **Verification:** PRIMARY — Government Royal Commission report.

SECTION 10: Watchtower's Own Statements About Its Structure

Claim: Around 2010, Watchtower directed the Menlo Park Congregation in California to dissolve and merge with the Redwood City congregation, surrendering the local Kingdom Hall. Three elders objected, were removed, and ultimately disfellowshipped; they filed a series of lawsuits over the following two years.

- **Source:** JWLeaks, "Menlo Park Congregation" — court documents archive.
- **URL:** <https://jwleaks.org/scandals/menlo-park-congregation/>
- **Verification:** SECONDARY — Documentary archive of the underlying court filings.

Claim: In open court during the Menlo Park litigation, Watchtower's general counsel Calvin Rouse described the religion as a hierarchical organization structured like the Catholic Church.

- **Source:** JWSurvey, "Are Jehovah's Witnesses a hierarchical religion? And does it matter?" (reproduces the official court transcript with screenshot).
- **URL:**
<https://jwsurvey.org/cedars-blog/are-jehovahs-witnesses-a-hierarchical-religion-and-does-it-matter>
- **Verification:** SECONDARY — Transcript reproduction with the court manuscript clipping.
 - **Key quote:** *"I am general counsel for the National Organization of Jehovah's Witnesses out of Brooklyn, New York. Ordinarily, I wouldn't be here, but this is one of our 13,000 congregations in the United States. We are a hierarchal religion structured just like the Catholic Church. [sic — original transcript reads "hierarchal"]"*

Claim: In a letter dated July 20, 1998 to All Bodies of Elders in the United States, Watchtower's headquarters warned elders that appointing former child abusers to positions of trust could create legal liability for the organization.

- **Source:** Robins Kaplan LLP, "Establishing Duty in Child Sex Abuse Cases Against the Jehovah's Witnesses" (citing the letter as produced in *Lopez v. Watchtower*, San Diego County Superior Court).
- **URL:** <https://www.robinskaplan.com/newsroom/insights/establishing-duty-in-child-sex-abuse-cases-aga-inst-the-jehovah-witnesses>
- **Verification:** SECONDARY — Legal-analysis article quoting from the letter as produced in California court litigation; the letter is also archived as Annexure B in the Steven Unthank submission to the New York State Attorney General.
 - **Key quote:** *"this could result in costly lawsuits. . . . [C]ourt officials and lawyers will hold responsible any organization that knowingly appoints former child abusers to positions of trust, if one of these, thereafter, commits a further act of child abuse."*

SECTION 11: The September 2025 Edition of Shepherd the Flock of God

Claim: On September 1, 2025, Watchtower issued a new edition of *Shepherd the Flock of God*. The procedural step that requires elders to contact the branch office first when a serious matter arises was not changed in this revision.

- **Source:** "A Brutal Breakdown of the Elders Rulebook 'Shepherd the Flock of God'," AvoidJW, September 14, 2025 (analysis of the leaked September 1, 2025 edition with cross-edition comparisons).
- **URL:** <https://avoidjw.org/news/shepherd-flock-of-god-elders-rulebook-manual-doctrine/>
- **Verification:** SECONDARY — Advocacy analysis based on the leaked edition; substance has been cross-checked against earlier published editions of the manual.

SECTION 12: Additional Supporting Sources

***Padron v. Watch Tower Bible and Tract Society of New York* — California appellate opinion (FindLaw)**

- **Source:** California Court of Appeal, 2017 published opinion.
- **URL:** <https://caselaw.findlaw.com/court/ca-court-of-appeal/1879521.html>
- **Verification:** PRIMARY — Published court opinion.
- **Contains:** Full text of the California appellate opinion in *Padron*, including the discovery sanctions framework and the court's discussion of Watchtower's shifting positions on the corporate structure.

JWChildAbuse.org Caekaert document archive

- **Source:** JWChildAbuse.org — independent legal-document archive maintained for the *Caekaert v. Watchtower* and *Rowland v. Watchtower* cases.
- **URL:** <https://www.jwchildabuse.org/news/jehovahs-witnesses-settle-historic-child-abuse-cases-in-federal-court/>
- **Verification:** SECONDARY — Curated archive of *Caekaert* primary court documents.
- **Contains:** Hosted PDFs of key motion filings, sanctions orders, spoliation orders, and related rulings in *Caekaert* and *Rowland*, including the Brumley affidavits, the August 23, 2022 sanctions order, the April 14, 2023 fees order, and the June 10, 2024 spoliation order.

Submission in support of complaint to the New York State Attorney General — Steven Unthank

- **Source:** Steven Unthank, submission to the New York State Office of the Attorney General (April 2024).
- **URL:** <https://secular-nsw.com.au/wp-content/uploads/2024/04/New-York-Attorney-General-submission-Watch-Tower-by-Steven-Unthank.pdf>
- **Verification:** SECONDARY — Investigative compilation.
- **Contains:** Reproduces the March 14, 1997 letter (Annexure A) and the July 20, 1998 letter (Annexure B) in full, alongside a narrative timeline of Watchtower's child abuse reporting policies and the development of the internal database.

Australian Royal Commission Case Study 29 — full report and transcripts

- **Source:** Royal Commission into Institutional Responses to Child Sexual Abuse (Australia), Case Study 29 final report (October 2016).
- **URL:** <https://www.abuseincare.org.nz/our-research/library/v/300/case-study-29-the-response-of-the-jehovahs-witnesses-and-watchtower-bible-and-tract-society-of-australia-ltd>
- **Verification:** PRIMARY — Government inquiry report.
- **Contains:** Statistical findings on the Australian branch's internal abuse records, hearing transcripts including the testimony of Governing Body member Geoffrey Jackson, and the Commission's findings on Watchtower's reporting practices.

Ninth Circuit Court of Appeals — full opinion in *Rowland v. Watch Tower*

- **Source:** U.S. Court of Appeals for the Ninth Circuit, July 7, 2025 opinion (Nos. 24-5196, 24-5200).
- **URL:** <https://cdn.ca9.uscourts.gov/datastore/opinions/2025/07/07/24-5196.pdf>
- **Verification:** PRIMARY — Published Ninth Circuit opinion.
- **Contains:** Full reasoning of the panel decision affirming the district court's sanctions against Brumley under 28 U.S.C. § 1927, including discussion of the "reckless disregard" standard and Brumley's status as an attorney for purposes of § 1927.