

REDACTED

STATEMENT OF MAX HORLEY

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D.O.B: 3rd January, 1960

- 1. An overview of your involvement with the Jehovah's Witnesses Church, including but not limited to an overview of:**

- a. the congregations you have attended;
- b. any roles you have held within the Church; and
- c. your role as an elder in the Narrogin Congregation.

1.1. My parents became Jehovah's Witnesses around the time they were married so I have been associated all my life. I attended the congregation in Pingelly until the year I started school when the family moved to Narrogin in 1966. I got baptized in 1978 and was appointed a Ministerial Servant in 1985. I was appointed as an Elder in 1988 and served as the congregation Secretary until Bill Neil was removed in 1992 and I was appointed the Presiding Overseer (now known as the Coordinator of the Body of Elders). At the end of 1997 I moved to Halls Head along with my young family and was appointed an Elder in the Halls Head congregation in January, 1998. I became the Secretary around May, 2010. When the Dawesville congregation was formed in November, 2012 I was appointed an Elder and continue to serve as Secretary.

- 2. Your knowledge and understanding of the systems, policies and procedures in place within the Jehovah's Witness Church between 1980 and 1986 to:**

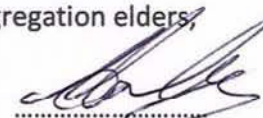
- a. Respond to allegations or complaints of child sexual abuse made within the Church; and
- b. prevent child sexual abuse within the Church; and
- c. identify child sexual abuse within the Church;

including but not limited to, your understanding of those systems, policies and procedures as they related to your role as an elder in the Church.



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- 2.1. I was not appointed an elder until 1988 so my knowledge of policies and procedures was limited to what was contained in Watchtower articles that I could reference. After my appointment, I received some handbooks (dated 1977, 1979, 1981) which had limited additional references. These were combined into one publication in 1991 entitled "Pay Attention to Yourselves and to All The Flock". This publication contained only two references to responding to cases of child sexual abuse and nothing specifically on how to identify or prevent this from happening. The publication did provide information on how to proceed in all cases of sexual misconduct, that is, sexual relations outside of the marriage arrangement. A judicial committee would hear all evidence and then the wrongdoer would be reproofed if repentant and removed from the congregation if unrepentant. Evidence would have to include a confession or testimony of two or more witnesses to the same conduct.
- 2.2. Our monthly magazines the Watchtower and Awake! deal with the issue of child sexual abuse from time to time, from the point of view of stating how wicked it is, helping parents protect children and children protect themselves, and helping victims deal with it and encouraging them to report it.
- 2.3. Also, the congregation is instructed from the Bible that, if they become aware of a case of serious wrongdoing, including child abuse, they are obligated to approach the wrongdoer and encourage him/her to speak to the elders about it, or if this does not happen, to report the wrongdoing themselves to the elders. The relevant Bible principle makes it clear that failure to report another's wrongdoing can make one responsible before God, and this is emphasised to the congregation.
3. **Any training that you have received, participated in, and/or delivered in relation to responding to allegations, prevention, and/or identification of child sexual abuse prior to and/or during your consideration of the allegations made by** BCB **in 1991.**
- 3.1. Over the years elders have received a number of letters from the Watchtower Society with references to child sexual abuse namely, but not limited to, 8/89, 4/92, 11/95, 5/97, 12/98, 2/09, 10/12. The later letters provide updated information and often replaced the earlier ones. In 2010 we received the publication "Shepherd the Flock of God" which also contained information on how to handle reports and cases of child sexual abuse and included references to printed material, i.e. letters to the body of elders. I have also attended a number of training days provided to congregation elders,



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some of which included information on child sexual abuse. These were conducted in 1992, 1995, 1998, 2002, 2006, 2010, and 2012. Now we are directed to contact the branch office legal department if any cases are brought to our attention.

4. **A summary of your experience, both prior to and since the allegations made by** BCB
REDACTED in 1991, of responding to allegations of child sexual abuse within the Church.

4.1. The case involving BCB is the only one concerning child sexual abuse in which I have been involved.

5. **The response of the Narrogin Congregation to allegations of child sexual abuse made by** BCB
in relation to William (Bill Neill) in or around 1991, with specific reference to:

- a. **when, and in what circumstances, you became aware of the alleged abuse;**
- b. **any correspondence, including the substance of that correspondence, that you, alone and/or together with any other member of the Narrogin Congregation, had with the Legal and/or Service Departments of Watchtower Australia after you became aware of the alleged abuse;**
- c. **any discussion(s) or meeting(s) that you, alone and/or together with any other member of the Narrogin Congregation, were involved in, including the substance of those discussions or meetings, with any person about the alleged abuse, including but not limited to any discussions or meetings with:**
 - i) BCB;
 - ii) BCC;
 - iii) **William (Bill) Neill;**
 - iv) **Bronwyn Neill;**
 - v) **any other member of the Neill family; and/or**
 - vi) **Doug Jackson.**

- 5.1. Unfortunately my recollections are vague as it was a very long time ago and I did not keep any notes at the time. I remember BCB visiting me at home and I think BCC was with her although I do not remember if they were already married or only dating at the time. I did not contact the Watchtower Society. I do not remember talking to Bill Neill about the allegations on my own however we must have been expecting a visit of the



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Circuit Overseer and, when he did visit, both Doug Jackson and I met with Bill and also [BCB] separately to discuss the allegations. When [BCB] left school she was working [REDACTED] in Narrogin. As her family lived on a farm a 45 minute drive from town, [BCB] stayed with Bill's family during the week and went home on the weekends. She became a part of the Neil family while living with them and shared a room with one or more of the daughters. The accusation was that Bill touched [BCB]'s breasts through her nightgown on more than one occasion either when he went to the room to kiss the girls good night or at other times when he was showing affection. Bill denied that he had deliberately done anything improper and, if anything had happened, it had been unintentional. Due to the lack of clear proof from either party, it became a case of one person's word against another. However, it had cast a cloud over the qualifications for Bill to remain an elder. I do not recall talking to Bronwyn Neil or any other members of the Neil family.

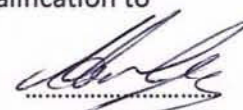
5.2. I don't recall [BCB] mentioning any other abuse by Bill Neill other than him touching her breasts. I am not saying that she did not, it is just that after more than 20 years I cannot remember it.

5.3. I do recall having a conversation with [BCB] around this time, in the course of which I said to her words to the effect, "It would be better not to talk about this matter within the congregation, because there's a fair bit of talk going around about why Bill [referring to Bill Neill] has stood down as an elder." I said this because I believed that gossip and speculation about the matter would be hurtful to [BCB] and her family, and to Bill and his family. I said this of my own initiative and was not asked to say it by anyone.

5.4. I never said anything to [BCB] about whether she should or should not report Bill's behaviour to the authorities.

6. The decision that William (Bill) Neill step down as an elder of the Narrogin congregation in 1992, and the reasons for that decision.

6.1. Prior to this issue being raised, I was involved with Bill Neil in handling another situation that had arisen in the congregation. I felt that the comments he made to the people involved was out of character for an elder, not given in a loving and caring manner. The comments he made on that occasion and other comments around that time then coupled with the case involving [BCB] cast doubts on his qualification to



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serve. I felt that he no longer had freeness of speech, that he was no longer 'Irreprehensible' or 'free from accusation'. (1Tim. 3:2, Titus 1:6,7). Doug Jackson agreed with me to recommend his removal as an elder. This was conveyed to the Watchtower Society along with a report on what had occurred. His deletion was then announced to the congregation without mentioning the reasons.

7. Your involvement, if any, in any decision to reappoint William (Bill) Neill as an elder of the Narrogin congregation, and the reasons for that decision.

7.1. Bill did speak to me on a few occasions about being reappointed in the years between 1992 and 1995. However, I did not feel enough time had passed to live down any negative feelings from the rest of the congregation. Bill and his family moved to Willetton congregation in Perth in about 1995. I later heard that he had been reappointed as an elder in that congregation. He was not reappointed in Narrogin congregation.


8. Any correspondence , including the substance of that correspondence, that you, alone and/or together with any other member of the Narrogin congregation and/or Doug Jackson, had with any other Jehovah's Witness congregation and/or Watchtower Australia relating to the allegations of child sexual abuse made by BCB

8.1. As mentioned above, the only correspondence I recall is the report sent to the Watchtower Society along with the recommendation to remove Bill as an elder by Doug Jackson. I do not have a copy of that report.

9. Your recollection of William (Bill) Neill's attendance at and membership of the Narrogin Congregation following the decision in 1992 for him to stand down as an elder, including but not limited to:

- a. The period of his membership in the Congregation from 1992;
- b. His role(s) within the Congregation from 1992;
- c. Any privileges or restrictions applied to him by the Narrogin congregation;
- d. Any specific systems and/or procedures that the body of elders of the Narrogin congregation put in place in relation to his contact with children.

9.1. Bill continued to attend meetings along with his family. In fact, he was rarely missing. I do not recall any specific restrictions applied to him. I understand he and his family moved to Perth in 1995 and attended meetings in the Willetton congregation.



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