

**ROYAL COMMISSION INTO INSTITUTIONAL  
RESPONSES TO CHILD SEXUAL ABUSE**

**Public Hearing - Case Study 29  
(Day 153)**

Level 17, Governor Macquarie Tower  
Farrer Place, Sydney

On Wednesday, 5 August 2015 at 10am

Before	
The Chair:	Justice Peter McClellan AM
Commissioner:	Professor Helen Milroy

Counsel Assisting:	Mr Angus Stewart SC
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1 MR STEWART: As your Honour pleases, the first witness  
2 today will be Mr Vincent Toole.  
3  
4 THE CHAIR: It's necessary for you to be sworn. Will you  
5 take an oath on the Bible?  
6  
7 MR TOOLE: Yes, certainly. Just excuse my voice, there  
8 are some problems.  
9  
10 <VINCENT JOSEPH TOOLE, sworn: [10.04am]  
11  
12 <EXAMINATION BY MR STEWART:  
13  
14 MR STEWART: Q. Mr Toole, will you state your full name,  
15 please?  
16 A. Vincent Joseph Toole.  
17  
18 Q. Do you have a copy of your statement dated 10 July  
19 2015 to hand?  
20 A. Yes, I do.  
21  
22 Q. Are there any amendments or corrections you wish to  
23 make to the statement?  
24 A. No.  
25  
26 Q. Do you confirm the statement to be true and correct?  
27 A. Yes.  
28  
29 MR STEWART: I tender the statement.  
30  
31 THE CHAIR: Mr Toole's statement will be exhibit 29-023.  
32  
33 **EXHIBIT #29-023 STATEMENT OF VINCENT JOSEPH TOOLE DATED**  
34 **10/07/2015**  
35  
36 MR STEWART: Q. As I understand it, you were baptised as  
37 a Jehovah's Witness in 1972; is that correct?  
38 A. Yes, that's correct.  
39  
40 Q. How old were you then?  
41 A. I was born in 1948, so probably 23, 24.  
42  
43 Q. How did you come to be a Jehovah's Witness?  
44 A. I was - I moved into a unit with someone who was  
45 having a Bible study. I'd been brought up quite  
46 religiously. I'd attended a religious boarding school for  
47 five years prior to that, but after I left school

1 I basically stopped attending church and, later on, when  
2 I moved into this unit, this man was studying. I'd never  
3 really read a Bible before.  
4

5 Q. Mr Toole, sorry to interrupt you. I'm just looking  
6 for an a short answer. So you were introduced through  
7 someone you were sharing with?

8 A. Yes, I studied and was satisfied that this was the  
9 truth and wanted to dedicate my life to serve God.  
10

11 Q. You were appointed as an elder in 1977, as  
12 I understand it; is that right?

13 A. Yes, that's correct.  
14

15 Q. As I understand it, between being baptised and being  
16 appointed an elder, typically there would be no formal,  
17 full-time training that someone would go through before  
18 being appointed an elder?

19 A. No formal training, no.  
20

21 Q. So it would be through involvement in the various  
22 activities of the congregation and the teaching and so on;  
23 is that right?

24 A. No tertiary education or anything like that. It was  
25 just involvement in the church, application, and  
26 involvement as such.  
27

28 Q. You were a circuit overseer from 1980 to 1989; is that  
29 right?

30 A. Yes.  
31

32 Q. From 1989 you commenced working at the branch  
33 headquarters; is that right?

34 A. Yes, that's correct.  
35

36 Q. Would it be right to refer to that as Bethel?

37 A. Yes, that's another term.  
38

39 Q. And that term is also used to refer to the world  
40 headquarters in Brooklyn; is that right?

41 A. Yes, that's correct.  
42

43 Q. When you commenced working at branch headquarters, is  
44 it then that you commenced your legal studies?

45 A. Yes, not long after I arrived there.  
46

47 Q. Did the branch committee, or did the Jehovah's

1 Witnesses, then sponsor your legal studies?

2 A. Yes.

3

4 Q. In 1993 you completed those studies and were admitted  
5 as a solicitor; is that right?

6 A. Yes, that's correct.

7

8 Q. Since then you've done legal work for Jehovah's  
9 Witness Australia or Watchtower Bible & Tract Society  
10 Australia on a voluntary basis; is that right?

11 A. Yes, that's correct.

12

13 Q. Since 1995, you have also had your own legal practice  
14 under the name Vincent Toole Solicitor?

15 A. Yes, that's correct.

16

17 Q. Does that legal practice do independent work outside  
18 of Jehovah's Witness work, or do you only do Jehovah's  
19 Witness work through that practice?

20 A. Primarily just Jehovah's Witness work, but I've done  
21 work for my family and other people.

22

23 Q. But am to I understand that you don't run it as a  
24 commercial law practice?

25 A. Not as a commercial practice, no.

26

27 Q. Since 2010, as I understand it, you've had oversight  
28 of the legal department in Australia; is that right?

29 A. Yes, that's correct.

30

31 Q. So you've been involved in the legal department, am  
32 I right, since 1989, and have had oversight since 2010?

33 A. That's correct.

34

35 Q. I take it, then, you also live at Bethel?

36 A. Yes, I do.

37

38 Q. Your daily needs are provided for as a member of the  
39 worldwide order of special full-time servants of Jehovah's  
40 Witnesses; is that right?

41 A. Yes, that's correct.

42

43 Q. In much the same way as Mr Spinks described yesterday?

44 A. Yes, exactly.

45

46 Q. If I can refer to your statement, and starting at  
47 paragraph 13?

1 A. Paragraph 13?

2

3 Q. Yes. You say:

4

5 *All elders serving in congregations of*  
6 *Jehovah's Witnesses throughout the world*  
7 *have been directed to contact the Legal*  
8 *Department in their local Branch Office as*  
9 *soon as they learn of an allegation*  
10 *involving child [sexual] abuse.*

11

12 So am I to understand that there is a uniform process set  
13 out which applies throughout the world?

14 A. Subject to the fact, of course, that many branches  
15 mightn't have a legal department, but they would contact  
16 the branch there. But in Australia we do have a legal  
17 department.

18

19 Q. That process, which is applicable throughout the  
20 world, is determined by the Governing Body?

21 A. It's a general direction throughout the world, as  
22 I understand.

23

24 Q. Yes, and it's a general direction throughout the world  
25 determined by the Governing Body?

26 A. Well, as far as I understand, it's a direction that  
27 elders have been given.

28

29 Q. Yes, but, Mr Toole, you seem to be trying to avoid  
30 what I understand to be quite well accepted, which is that  
31 it's the Governing Body that determines that direction?

32 A. That's what I understand, yes.

33

34 Q. And that is typical, is it, of all Jehovah's Witnesses  
35 policies and procedures - that is, they are determined by  
36 their Governing Body and made applicable throughout the  
37 world?

38 A. Yes, the general policy would be determined by the  
39 Governing Body, but the application in the local setting  
40 would depend on the branch committee applying it to the  
41 relevant things in their local area.

42

43 Q. Yes. Whether a policy is actually followed in  
44 practice is a separate question, but dealing with the  
45 setting of what the practice is supposed to be, that is set  
46 by the Governing Body?

47 A. That's what I understand.

1  
2 Q. Coming to the question of responses to child sexual  
3 abuse allegations specifically, the Australia branch then  
4 follows the guidelines of the Governing Body; is that  
5 right?  
6 A. The guidelines. But they will apply it in any way  
7 that needs to be adjusted in the local - for the local  
8 area.  
9  
10 Q. Let's just be clear on that. The particular  
11 application may vary from case to case; is that right?  
12 A. Yes, yes.  
13  
14 Q. But that application is intended to be within the  
15 parameters of the policy or procedure itself; is that  
16 right?  
17 A. Yes, I'd agree with that.  
18  
19 Q. It's the case, is it not, that the Australia branch  
20 office will not itself set any practice or policy to apply  
21 normatively, unless it's been approved by the Governing  
22 Body?  
23 A. In terms of policy, they will adjust it to the local  
24 circumstances. So, for example, if there was no legal  
25 department in Australia, for example, that direction  
26 wouldn't apply, so they'd have to adjust it to whatever the  
27 local situation was.  
28  
29 Q. Well, there wouldn't then be a direction from the  
30 Governing Body that the legal department should be  
31 contacted. In a country where there was no legal  
32 department, the direction from the Governing Body, which  
33 the branch would then set, or apply, would be that the  
34 branch office be contacted?  
35 A. Yes, that's right.  
36  
37 Q. Is there a constitution by which the Jehovah's  
38 Witnesses internationally are governed?  
39 A. I don't think I could answer that, but my  
40 understanding, it's clearly just what the Bible has to say.  
41  
42 Q. But seeking to address it, for a moment, from a legal  
43 perspective, what I understand from the statements is that  
44 one has a Governing Body situated in New York, but having  
45 an operation, I suppose, throughout the world, and then  
46 branches in various geographic areas and, also,  
47 congregations --

1 A. Yes.

2

3 Q. -- within the jurisdiction of each branch. That's  
4 right so far, isn't it?

5 A. Yes.

6

7 Q. And in Australia it's said that each congregation is,  
8 in a legal sense, a voluntary association; is that right?

9 A. Yes.

10

11 Q. Yet the congregations take their direction and  
12 instructions from the branch, which, in turn, takes its  
13 direction and instruction from the Governing Body - that  
14 would be right factually?

15 A. Yes, I think that's a reasonable --

16

17 Q. So, now, by operation of what legal rule or norm does  
18 that occur? In other words, by what legal rule or norm  
19 does the congregation take its direction from the branch?  
20 Is there a constitution, a contract, a corporation? Is  
21 there something that does it?

22 A. Not that I'm aware of.

23

24 Q. Is it not the case that the Governing Body sets out  
25 what the roles and responsibilities of all the various  
26 structures are and their relationship to each other, and  
27 the whole system, internationally, is operated in  
28 accordance with that?

29 A. You're really talking to me about an area I don't have  
30 much experience in, in terms of that. I just work in a  
31 local branch. But I think, in general terms, what you're  
32 saying, I would understand to be correct.

33

34 Q. Is there a manual or a document published by the  
35 Governing Body which sets that out - what its  
36 responsibilities are, what the branches' responsibilities  
37 are, and so on?

38 A. I'm unaware of any such document.

39

40 Q. So is there not, to your knowledge, a document which  
41 sets out the responsibilities of each of the Governing Body  
42 committees, for example?

43 A. I have no knowledge about that whatsoever.

44

45 Q. And a document, perhaps, which sets out how members of  
46 branch committees are to be appointed?

47 A. I have no knowledge about that. I've never seen or

1 heard of such things.

2

3 THE CHAIR: Q. Can I just understand: are you the  
4 senior lawyer advising the Jehovah's Witnesses in  
5 Australia?

6 A. I'm not sure about "senior", but I look after the  
7 legal department. But I'm being asked questions about  
8 things that I really haven't been involved in at all.

9

10 Q. I know, but I'm trying to get to understand your  
11 relationship to the management structure in Australia and  
12 in New York, you see. Normally, in an organisation, if  
13 there's a legal department and a head lawyer, then that  
14 person's services would be used to advise in relation to  
15 documents - the meaning of documents, the drafting of  
16 documents and so on.

17 A. Nothing - I've never been involved in any of the  
18 document types of situations that I'm being asked about, at  
19 all.

20

21 Q. Who, in the branch here, holds the reins?

22 A. The branch committee.

23

24 Q. The committee. How many people are on that committee?

25 A. Probably nine or 10, but it might be - it's around  
26 that figure. I'm not actually certain, but it's somewhere  
27 around that figure.

28

29 Q. Is that their job, to be members of that committee, or  
30 do they have other roles in the organisation?

31 A. They are appointed members of the branch committee.  
32 They collectively serve together, but they would have  
33 administrative roles at the branch doing different things.

34

35 Q. At the branch, though?

36 A. Yes, at the branch.

37

38 Q. They are all people who work at the branch?

39 A. Yes, they are at the branch.

40

41 Q. Is one of them, as it were, the head of the committee?

42 A. I think it's first among equals. I don't think anyone  
43 is head of the branch, as such, but Mr O'Brien cares for  
44 the coordination of that particular branch committee. But  
45 I don't think anyone has greater authority or lesser  
46 authority. If you're a member of the branch committee,  
47 I understand your an equal member of the branch committee.



1  
2 Q. The next step in the hierarchic organisation of the  
3 Jehovah's Witnesses from the branch committee is to where?

4 A. I think the branch committee goes back to the  
5 Governing Body.  
6

7 Q. In New York?

8 A. In New York. That's as I understand it.  
9

10 Q. Do you know whether they have to provide a report to  
11 the Governing Body?

12 A. I've never been on a branch committee. I don't know  
13 what happens there.  
14

15 Q. You mean you work as the Jehovah's Witnesses' lawyer,  
16 but you have no knowledge of what --

17 A. I have never been involved in a report given that way,  
18 because it's not a legal matter. Nothing has ever been  
19 discussed with me about that.  
20

21 MR STEWART: Q. The branch committee members, Mr Toole,  
22 are appointed by the Governing Body; is that right?

23 A. I understand that's the position, yes.  
24

25 Q. You say your understanding is that the branch  
26 committee members are equals. One of them is actually  
27 designated coordinator, is that not right?

28 A. Yes, I think he's the coordinator of the - of the  
29 branch committee.  
30

31 Q. And that designation or responsibility also is an  
32 appointment by the Governing Body?

33 A. I believe so, but I'm not absolutely certain - but  
34 I believe so. I'm sorry I don't have a lot of information  
35 on that, but I just - I've never been involved.  
36

37 Q. There are other copies coming shortly, but I'd just  
38 like to show you - there's a copy for you - a document.  
39 You see it's headed "Branch Organisation  
40 Effective December 15, 1977, Revised February 2003". It  
41 says:  
42

43 *This material in Branch Organisation --*  
44

45 *being the name of the publication --*  
46

47 *should not be copied or duplicated except*

1                   with the permission of the Branch  
2                   Committee.

3  
4                   It's published in the USA, I understand, by the Governing  
5                   Body. Have you seen this publication before?

6                   A.    No, I have not.

7  
8                   Q.    Do you know if this is the current edition?

9                   A.    I would have no idea.

10  
11                  MR STEWART:   Your Honour, I call for any revision or  
12                  subsequent edition to the publication "Branch  
13                  Organisation".

14  
15                  MR TOKLEY:   Until just then it wasn't called for. I will  
16                  have a look.

17  
18                  THE CHAIR:   I am sorry?

19  
20                  MR TOKLEY:   I'll have an inquiry made about it. There are  
21                  revisions.

22  
23                  THE CHAIR:   More than that: we'd like to know the answer.

24  
25                  MR TOKLEY:   Of course, your Honour. Without wishing to  
26                  interrupt my learned friend's line of questioning,  
27                  Mr O'Brien is coming to give evidence today. It may be  
28                  that some of these questions are best directed towards him.

29  
30                  THE CHAIR:   We'll let counsel take his course.

31  
32                  MR TOKLEY:   Of course, your Honour. Understood. One  
33                  final thing, if I may, could I ask for a non publication  
34                  order in respect of that? I would assume that it is a very  
35                  confidential document.

36  
37                  THE CHAIR:   You'd have to persuade me of that, Mr Tokley.  
38                  The Royal Commission, as far as possible, operates in  
39                  public.

40  
41                  MR TOKLEY:   Understood, your Honour.

42  
43                  THE CHAIR:   Presently, I can't see why this document  
44                  should not be a public document. You'd have to persuade  
45                  me.

46  
47                  MR TOKLEY:   Thank you, your Honour. I might take

1 instructions over the morning break on that.

2

3 MR STEWART: I haven't tendered it yet, your Honour.

4

5 THE CHAIR: I think we assume it's coming.

6

7 MR STEWART: Yes, it is. I'm grateful to my learned  
8 friend in relation to what he says about Mr O'Brien,  
9 because, really, that underscores the point that we really  
10 need, if there is such a document, a revision or updated  
11 version of this during the course of the morning, so that  
12 Mr O'Brien's evidence later in the day can serve some  
13 purpose.

14

15 THE CHAIR: Do you seek to be tender it now?

16

17 MR STEWART: There is no need to tender it right now,  
18 your Honour. I'll allow my learned friend to take his  
19 instructions with regard to a publication order or  
20 otherwise.

21

22 THE CHAIR: All right.

23

24 MR STEWART: Q. Can I take you, Mr Toole, to  
25 paragraph 15 of your statement?

26

27 A. Paragraph 15?

28

29 Q. Paragraph 15, yes. That's Ringtail 03. You'll see  
30 you say:

31

32 *Where the law does not require ministers of*  
33 *religion to report allegations of child*  
34 *abuse, the Legal Department has been*  
35 *instructed to direct the elders to clearly*  
36 *explain to the victim and/or their families*  
37 *that they have an absolute right to report*  
38 *the matter to the authorities and that they*  
39 *should feel completely free to do so.*

40

41 So you say there, that "the legal department has been  
42 instructed to direct", and then you go on to say what  
43 you've been instructed to direct. Who gave that  
44 instruction?

45

46 A. Well, I understand that's just a branch committee  
47 direction in harmony with the directions we've been given.

48

49 Q. Let's just clarify the terminology there. You say,

1 "the legal department has been instructed", so is that the  
2 case - the legal department has been instructed to direct,  
3 as you set out in that paragraph?

4 A. In harmony with the direction we were given in that  
5 previous letter about reporting, my understanding clearly  
6 is that's the direction that we are expected to give  
7 whenever we receive a call in relation to this matter.  
8

9 Q. So it's the branch committee that has given that  
10 instruction to the legal department?

11 A. I understand, in harmony with that letter.  
12

13 Q. In harmony with which letter?

14 A. The letter that is referred to just a little earlier,  
15 that one there, 1 October 2012.  
16

17 Q. That's at tab 124.

18 A. And that certainly is our practice.  
19

20 Q. Can you identify where, in the letter, the legal  
21 department is instructed or directed to direct elders to  
22 clearly explain to the victim and/or their families that  
23 they have an absolute right to report the matter to the  
24 authorities?

25 A. No, I can't, but it's in the spirit of what's being  
26 discussed there. It has always been my understanding that  
27 that's the direction that we're to give.  
28

29 Q. Well, Mr Toole, just to be clear, you say in your  
30 statement that the legal department has been instructed to  
31 do something. I understand, now, you are shifting from  
32 that and you're saying that that is in the spirit of this  
33 letter - it's not an instruction; is that right?

34 A. We don't have a written instruction to do that, no, if  
35 that's what you're asking.  
36

37 Q. You don't have any instruction, do you?

38 A. We've been informed that that's what we should be  
39 advising people when they call.  
40

41 Q. Isn't it the case that the legal department advises on  
42 legal obligations to report or otherwise, and then, with  
43 regard to other matters, the call from the elders is then  
44 passed on to the service desk?

45 A. I've been taking these calls pretty well exclusively  
46 now for the last two or more years. The direction I give  
47 specifically when someone calls in - we discuss the matter

1 as far as any mandatory reporting obligations that may  
2 apply, and then I make a particular point. I say - if the  
3 mandatory obligation doesn't apply in a certain State,  
4 I say, "I want you, two elders, to go back to the victim or  
5 their family and explain to them very clearly that they  
6 have the absolute right to be able to go and report this  
7 matter to the authorities. That's their privilege and they  
8 need to understand that, and that you will support them in  
9 whatever decision they make." That's the instructions  
10 I give every time.

11  
12 Q. So that's your practice, as opposed to being something  
13 you've been instructed to do?

14 A. Well, they don't - I haven't received formal  
15 instructions, that's what I'm saying, but that's what  
16 I understand clearly we have been asked to do.

17  
18 Q. You say you've done this exclusively for, did you say,  
19 two years or two and a half years?

20 A. Yeah, approximately two years, I've been taking the  
21 calls myself.

22  
23 Q. These are calls about allegations of child sexual  
24 abuse?

25 A. Yes.

26  
27 Q. And how many such calls have you taken in that period,  
28 would you estimate?

29 A. I couldn't tell you, but we probably get three,  
30 sometimes four, a month.

31  
32 Q. In respect of any of those, did you take the view that  
33 mandatory reporting requirements applied and, therefore,  
34 that the elders concerned had an obligation to report?

35 A. Yes.

36  
37 Q. And in respect of which States would those have been?

38 A. South Australia and Victoria.

39  
40 Q. I'd like to refer you to the Shepherd the Flock of God  
41 handbook at tab 120 and, in particular, at page 133,  
42 paragraph 22, Ringtail 134, under the heading "Taking  
43 Brothers to Court". You are familiar with this section of  
44 the handbook, I take it, Mr Toole?

45 A. Reasonably familiar.

46  
47 Q. There is a strong scripturally based message here, in

1 these paragraphs 22 and 23, isn't there, against the  
2 referral to secular authorities of disputes?  
3 A. This is entirely civil matters; nothing to do with  
4 criminal.

5  
6 Q. This is what I wanted to come to. What is the basis  
7 for you saying that that is entirely civil and not  
8 criminal?

9 A. Well, this is dealing with situations where people  
10 have personal differences - maybe there is a difficulty  
11 with work; maybe there is a situation with defamation - or  
12 situations that people may well have a dispute with each  
13 other, and so the admonition is why not apply scriptural  
14 principles to try and resolve the matter. But it has - and  
15 if you go on a little further, it actually speaks about  
16 there are some things that even though they are personal  
17 matters, civil matters between individuals, they are the  
18 kind of thing that the congregation has no authority or no  
19 jurisdiction to be able to adjudicate on - things like  
20 custody matters, probate matters and things like that. So  
21 it's just dealing with issues that exist between  
22 individuals, but certainly not criminal matters in any way,  
23 shape or form.

24  
25 Q. You would appreciate that if not in all, certainly in  
26 most circumstances that might give rise to a criminal  
27 charge, a civil wrong would also have occurred which might  
28 give rise to a civil claim or dispute?

29 A. Well, that's potentially possible, yes.

30  
31 Q. Well, let's be more specific. In the case of a sexual  
32 abuse allegation, that may give rise to both a criminal  
33 charge and a civil claim?

34 A. All I can tell you is that that particular scripture  
35 does not prevent --

36  
37 Q. It's going to help us if you just answer my question.  
38 I'm not talking about the scripture. I asked you a  
39 specific question which, between you and I, as lawyers, we  
40 should be able to discuss and find common ground quite  
41 easily.

42 A. Sure.

43  
44 Q. What I said to you is: in the case of a sexual abuse  
45 allegation, the facts of the allegation may give rise to  
46 both a criminal charge and a civil claim.

47 A. Yes, potentially.

1  
2 Q. So a person who has been abused would have an issue or  
3 a dispute with their abuser, which might give rise, in the  
4 law, to matters to be resolved - one criminal, and one  
5 civil?  
6 A. Potentially, yes.  
7  
8 Q. Is it not the case, then, that, absent any clear  
9 guidance to the contrary, publishers who have access to  
10 information like this would understand it to mean that  
11 their dispute which arises from a sexual abuse allegation  
12 is not to be referred to the courts --  
13 A. No.  
14  
15 Q. -- whether that's the criminal component or the civil  
16 component?  
17 A. No, I completely disagree.  
18  
19 Q. Did you follow the evidence in the Commission last  
20 week?  
21 A. Yes.  
22  
23 Q. Particularly of the two survivors, [BCB] and [BCG] who  
24 gave evidence?  
25 A. Yes, I did.  
26  
27 Q. You would have heard [BCB] give evidence that she was  
28 taught that these passages applied equally to criminal  
29 complaints?  
30 A. I did hear her say that.  
31  
32 Q. If I can take you to paragraph 16 of your statement,  
33 the quote that you have in that paragraph says that there  
34 is no obligation on elders to report if the law does not  
35 oblige it?  
36 A. This is paragraph 16, did you say?  
37  
38 Q. Yes, that's right. So:  
39  
40 *Where the law does not obligate elders to*  
41 *report cases that come to their attention,*  
42 *there is no need for them to do so, but if*  
43 *the matter becomes known to the authorities*  
44 *[they must cooperate] ...*  
45  
46 And so on - well, it doesn't actually say that:  
47

1           ... they are required to disclose  
2           information they have in their possession,  
3           they will do so unless they can claim  
4           ecclesiastical privilege.  
5

6           As I understand it - and since you're the one who advises  
7           on reporting obligations, perhaps you can confirm - within  
8           the Jehovah's Witness view of things, in the absence of a  
9           legal obligation to report to authorities - whether police  
10          or child protection authorities - there is no moral  
11          obligation to report; is that right?

12         A.   Elders do not have the scriptural authority to take  
13          away the right of an individual to decide whether or not  
14          they want to pursue the matter or not. They have the right  
15          to make a decision in terms of their own best interests.  
16

17         Q.   You'll appreciate, Mr Toole, that there are often  
18          circumstances in which an individual can't exercise such a  
19          right, such as a child, for example, whose parents, for  
20          whatever reason, don't exercise that right of reporting on  
21          their behalf?

22         A.   Well, their guardian/parent would be perfectly  
23          entitled to decide what's in their best interests.  
24

25         Q.   And if their guardian/parent did not report, or told  
26          the elders, "I'm not reporting", by reason, for example,  
27          that she doesn't want the abusing father to be charged and  
28          potentially go to gaol, then the child remains at risk.  
29          Would that not, within the Jehovah's Witness view of  
30          things, give rise to a moral obligation on the elders to  
31          report in order to protect the child?

32         A.   That's why they contact the service department and  
33          discuss the whole situation and work out how best to be  
34          able to protect the child. There might be a whole lot of  
35          other avenues that the service department, in conjunction  
36          with the local elders, can discuss about how that's to be  
37          done. But at the end of the day, if you go back to an  
38          article that we have, published in 1985, it says that when  
39          you hear a report of child abuse, whatever is necessary to  
40          be done needs to be done to protect the child.  
41

42         Q.   So would it be right that, in some circumstances,  
43          there would be a need for elders to report to the  
44          authorities?

45         A.   There may well be, yes.  
46

47         Q.   Do you see, then, where this quote says there is no



1 need for them to do so:

2

3 *Where the law does not obligate elders to*  
4 *report cases that come to their attention,*  
5 *there is no need for them to do so ...*

6

7 A. Where are you reading from?

8

9 Q. In the quote, in italics:

10

11 *Where the law does not obligate elders to*  
12 *report cases that come to their attention,*  
13 *there is no need for them to do so ...*

14

15 So that is, indeed, a discouragement to elders from  
16 reporting, isn't it?

17 A. No, I think you're possibly reading it a little in  
18 isolation. What that's saying, in terms of mandatory  
19 reporting obligations, if there is an obligation to report,  
20 the elders report. If they don't have an obligation to  
21 report, well, then, as far as their legal obligation is  
22 concerned, then they have no requirement to report. It's  
23 not discussing leading people in or out of danger. It's  
24 just simply stating what their obligation is under the law.

25

26 Q. Could I show you tab 131A, which is a very recent  
27 document, 6 November 2014, a letter from the branch to All  
28 Bodies of Elders, and it's headed, "Procedures when legal  
29 issues are involved". You were probably involved in  
30 drafting this letter, were you, Mr Toole?

31 A. No, I was not.

32

33 Q. But you're familiar with it, I take it?

34 A. Reasonably, yes.

35

36 Q. Perhaps we can go to the third page, paragraph 14,  
37 which deals with "Handling reports of crimes":

38

39 *When the elders learn of alleged criminal*  
40 *activity on the part of one of Jehovah's*  
41 *Witnesses or someone associated with the*  
42 *congregation as the accused or the victim,*  
43 *they should immediately call the Legal*  
44 *Department.*

45

46 It goes on. You can read it to yourself if you like, but  
47 I think it's the seventh line down on the left-hand side it

1 starts:

2

3 *Strict confidentiality ...*

4

5 Do you see that?

6 A. Yes.

7

8

9 *Q. Strict confidentiality must be maintained*  
10 *to avoid unnecessary entanglement with*  
11 *secular authorities who may be conducting a*  
12 *criminal investigation of the matter.*

13

14 A. Yes.

15

16 Q. Just in relation to that, this approach presupposes  
17 that any report of criminal activity is confidential - that  
18 would be right?

19 A. Can you restate the question, please?

20

21 Q. What is stated here presupposes that an allegation of  
22 criminal activity is confidential?

23 A. No, it presupposes that, as far as the elders in  
24 dealing with the matter, information is confidential, but  
25 the other aspect, they don't want to get involved or in any  
26 way disturb a police investigation or situation like that.

27

28 Q. Of course, that confidentiality then, as I understand  
29 it, is confidentiality within the congregation; is that  
30 right?

31 A. Well, it's within - the confidentiality within the  
32 person who is actually hearing it, in fact - it would be  
33 the elder dealing with the matter, if they were dealing  
34 with it.

35

36 Q. Other than as provided for, to have to tell the Body  
37 of Elders, where that's required, that information would  
38 not be passed, or should not be passed, by that elder to  
39 others in the congregation?

40 A. No, they would keep it confidential.

41

42 Q. But there would be no breach of that confidentiality  
43 in the elder reporting an allegation of criminal activity  
44 to the authorities, would there?

45 A. I guess that would depend on the circumstances, but -  
46 in actual fact, they are breaching a confidentiality to do  
47 that, but that may well be necessary in certain

1 circumstances.

2

3 Q. I understand in certain circumstances it may be, but  
4 it's not necessarily so. In other words, if someone  
5 reports to an elder that they saw some criminal activity -  
6 let's say a robbery or something - absent a specific  
7 request from the person reporting that it be kept  
8 confidential, there would be no obligation of  
9 confidentiality on the elder, surely

10 A. Not in relation to that matter, unless they were  
11 handling it themselves. They only have second-hand  
12 information there.

13

14 Q. Passing information to the authorities would not, as  
15 it is put there, produce an entanglement with the secular  
16 authorities; it would be merely making a report to the  
17 secular authorities?

18 A. If they were simply passing on that information, no,  
19 it wouldn't be - they are passing on a comment that they  
20 have heard from someone else. Isn't that what you're  
21 asking?

22

23 Q. Yes, that is what I'm asking. So in the case of a  
24 sexual abuse allegation, you would accept it's the victim's  
25 confidentiality?

26 A. Yes, and their right to be able to preserve or decide  
27 what they want done about it.

28

29 Q. And if the victim does not require of the elder to not  
30 report, then there is no breach of confidentiality in  
31 reporting?

32 A. If the victim was quite happy for the elder to report,  
33 there'd be no reason why the elder wouldn't - maybe even  
34 accompany the parent along to make sure that the report was  
35 made. There's no reason why that wouldn't be done. For  
36 example, in that case - one of those reporting situations  
37 that I mentioned in Victoria, that's exactly what was done.  
38 The two elders went to the police, spoke to the parent.  
39 The parent and the two elders went to the police and  
40 reported the matter.

41

42 Q. If we look at paragraph 15, this question of  
43 confidentiality goes a little further. Do you see  
44 paragraph 15. It's in relation to "Search warrants":

45

46 *Elders should never give consent for anyone*  
47 *to search a Kingdom Hall or any other place*

1           *where confidential records are stored.*  
2           *Conscientious elders do all they reasonably*  
3           *and peaceably can to preserve the*  
4           *confidentiality of the congregation in*  
5           *harmony with the principle set out in Acts*  
6           *5:29.*

7  
8           You are familiar with what that principle is, are you, Mr  
9           Toole?

10          A.    5:29.

11  
12          Q.    "Peter and the other apostles said: 'We must obey God  
13               as ruler rather than men'", are you familiar with that?

14          A.    Yes.

15  
16          Q.    Isn't that a clear message that there are  
17               circumstances in which God's law, or rule or requirement,  
18               will override what the authorities may require?

19          A.    That's possible, but I wonder if we could go back to  
20               I think it's paragraph 4 of this document - I think it's 4.  
21               Let's see. Yes. There it says:

22  
23               *Direction on handling child abuse matters*  
24               *can be found in separate correspondence.*  
25               *However, we are pleased to provide*  
26               *consolidated direction on handling other*  
27               *congregation matters involving legal*  
28               *issues.*

29  
30          See, these are just general legal principles, but it's not  
31               specifically dealing with child abuse matters.

32  
33          Q.    I accept that. But dealing with it at the level of  
34               general legal principles, you will accept that what is said  
35               here, in a reliance on Acts 5:29, there is a clear message  
36               sent to people, which is to not cooperate with secular  
37               authorities unless you have to?

38          A.    No. The principle of 5:29 is that we will obey the  
39               authorities in whatever they ask us to do, but there is a  
40               relative subjection in the sense that we won't do what they  
41               ask us to do if they ask us to break God's law. I think  
42               Mr Spinks basically touched on that fairly clearly  
43               yesterday. So if, in fact, there is no basis to be able to  
44               retain information, we willingly will provide it. If there  
45               is a subpoena to ask for documents, we'll provide it. If  
46               there is a protection to that document, then, that might be  
47               a different situation, but if there is no legal

1 protection - and when it comes to child abuse matters, you  
2 may or may not be aware that ever since 1999 we've  
3 cooperated with the authorities, as far as I understand, on  
4 every instance where the authorities have asked for  
5 information. Elders have made statements, they have  
6 appeared as witnesses, documents have been produced when  
7 they have been requested. We have been absolutely open  
8 every time we've been approached by the authorities in  
9 relation to this matter.

10  
11 Q. I'm just addressing this right now at the level of the  
12 message that is sent to people reading Jehovah's Witness  
13 publications, including elders and publishers. Let me give  
14 you another example. If we can go to tab 127, and starting  
15 at the first page so you can see what the publication is,  
16 it's Keep Yourselves in God's Love. It's published in 2008  
17 and, again, this is a November 2014 printing of that  
18 publication, published by the Governing Body. If we can  
19 look at page 59, Ringtail 16, paragraph 18, that deals with  
20 the concept of "Taking up 'The Complete Suit of Armour'".  
21 You'll see it says:

22  
23 *Those who keep themselves in God's love*  
24 *also enjoy spiritual protection from Satan,*  
25 *who wants to deprive Christians, not just*  
26 *of happiness, but of everlasting life ...*  
27 *"We have a struggle," said Paul, "not*  
28 *against blood and flesh, but against the*  
29 *governments, against the authorities,*  
30 *against the world rulers of this darkness,*  
31 *against the wicked spirit forces in the*  
32 *heavenly places."*

33  
34 Then there is a scriptural support for that:

35  
36 *The word "struggle" suggests that our fight*  
37 *is not long-distance - from the safety of a*  
38 *hidden bunker ...*

39  
40 and so on.

41  
42 *Furthermore, the terms "governments,"*  
43 *"authorities," and "world rulers" indicate*  
44 *that attacks from the spirit realm are*  
45 *highly organised and deliberate.*

46  
47 I'm suggesting to you that this sends out a very clear

1 message that adherence to the Jehovah's Witness system of  
2 beliefs should be sceptical of secular authorities and not  
3 cooperate with them, unless they really have to?

4 A. I completely disagree.

5  
6 Q. How are we to understand this?

7 A. We're talking about spiritual things in terms of  
8 Satan, demons, things that are really trying to attack your  
9 faith. There is a battle. To be able to preserve morality  
10 and preserve a code of behaviour that is acceptable to  
11 Christians is a battle in today's world.

12  
13 Can I just again point you to something so that it  
14 really clarifies this issue?

15  
16 Q. Of course. I would welcome that.

17 A. It's in Romans chapter 13. It was read yesterday.  
18 This is the message that all Christians, Jehovah's  
19 Witnesses, take really seriously. Chapter 13, and it's  
20 talking about the governments, it's talking about the  
21 secular authorities here, it says, chapter 13 verse 1:

22  
23 *Let every person be in subjection to the*  
24 *superior authorities, for there is no*  
25 *authority except by God; the existing*  
26 *authorities stand placed in their relative*  
27 *positions by God. Therefore, whoever*  
28 *opposes the authority has taken a stand*  
29 *against the arrangement of God; those who*  
30 *have taken a stand against it will bring*  
31 *punishment against themselves. For those*  
32 *rulers are an object of fear, not to the*  
33 *good deed, but to the bad. Do you want to*  
34 *be free of fear of the authority? Keep*  
35 *doing good, and you will have praise from*  
36 *it; for it is God's minister to you for*  
37 *your good. But if you are doing what is*  
38 *bad, be in fear, for it is not without*  
39 *purpose that it bears the sword. It is*  
40 *God's minister, an avenger to express wrath*  
41 *against the one practising what is bad.*

42 *There is therefore compelling reason*  
43 *for you to be in subjection, not only on*  
44 *account of that wrath --*

45  
46 that's the authority of the government or the secular  
47 authorities --

1  
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47

*but also on account of your conscience.*

So Christians are being told that they are duty-bound to be obedient to the governments.

Q. But simultaneously they are being told they are in mortal struggle against governments and authorities.

A. Yes, but --

Q. You see. This is the difficulty, Mr Toole: I accept that there are very clear scriptures like that, but it's the case, too, isn't it, that there are equally clear scriptures reproduced and referenced in your publications which say just the contrary?

A. I think if you read the whole of that in context and look at it, it's quite clear what it's saying, but one thing you could never ever cite against Jehovah's Witnesses is that they are ever encouraged to disobey the law. We take it really seriously. In fact, if we weren't going to be obedient to the law, we'd be in contravention of what it says there in Romans chapter 13.

Q. I'm not going to take up the invitation to pursue that, because that will really divert us. I'll leave that for now with the suggestion I've made to you and your response to it.

A. Thank you.

Q. In paragraph 21 of your statement, you say:

*The Legal Department is not involved in managing the risk of child sexual abuse within the Jehovah's Witnesses Church.*

That's, as I understand it, because you advise on the legal obligations; is that right?

A. That's right.

Q. Such as whether to report --

A. That's as far as the legal department goes.

Q. Earlier you said it goes one step further: you, as a practice, make it clear to the elders --

A. Yes, yes, what we discussed.

Q. Just dealing with mandatory reporting requirements,

1 you set out in your statement how, currently, the position  
2 of the law is that mandatory reporting requirements vary  
3 from State to State and Territory to Territory?

4 A. I missed the first part?

5

6 Q. I'm moving now to deal with the question of mandatory  
7 reporting requirements.

8 A. Yes.

9

10 Q. You have set out in your statement that, insofar as  
11 the law is concerned, those requirements vary across the  
12 States and Territories of Australia; is that right?

13 A. Yes.

14

15 Q. I would take it, then - and I'm asking you - that that  
16 is burdensome on an organisation such as yours, to keep  
17 track of the differences in each State and have to advise  
18 accordingly?

19 A. Yes.

20

21 Q. Whether it's achievable or not, of course, is another  
22 question entirely, but I take it you, as a lawyer - the  
23 senior lawyer in the organisation - would welcome it if the  
24 requirements across the States and Territories were made  
25 uniform?

26 A. Yes, I would.

27

28 Q. With regard to confessional privilege which you  
29 mention in various places, but, for example, let's look at  
30 your paragraph 29.

31 A. Paragraph 29?

32

33 Q. You'll see in 29(a) you're dealing with South  
34 Australia and you say:

35

36 *... a number of nominated persons in*  
37 *various professions, including ministers of*  
38 *religion ... are required to report ...*

39

40 Then four lines down you say:

41

42 *... provided that the suspicion is formed*  
43 *in the course of the person's work or in*  
44 *carrying out their official duties with the*  
45 *exception of disclosures made in the*  
46 *confessional.*

47



1 Am I to understand there that, leaving aside the specific  
2 wording of the law in question, in South Australia the  
3 position is that there is an exception for disclosures made  
4 in a confessional setting; is that right?

5 A. Yes.

6  
7 Q. Then in 29(b), in relation to Victoria, equally in the  
8 sixth line you say:

9  
10 *This obligation does not apply if the*  
11 *belief was obtained in a religious*  
12 *confession.*

13  
14 A. That's correct.

15  
16 Q. I think I took you to the paragraph earlier in another  
17 document that referred to minister/communicant privilege.  
18 It is really that that I'm addressing in the Jehovah's  
19 Witness context. You, as I understand it, advise elders on  
20 their obligations under these provisions?

21 A. Yes.

22  
23 Q. So you would be involved in advising when this  
24 confessional exception is available to them or not?

25 A. For the last 15 years, even if it was a confession, if  
26 the authorities approached the elders seeking information,  
27 they have completely cooperated. So there's been no claim  
28 for confessional privilege at all during that period.

29  
30 Q. So do I understand from that, that within the  
31 Jehovah's Witness view of things, an obligation of  
32 confidence that arises from a confession being made is one  
33 that is overridden by any requirements of the law?

34 A. That's the position we've taken.

35  
36 Q. Not so in some other religions where a priest, who  
37 receives a confession in the requisite circumstances, would  
38 face gaol before breaking the confidence of that  
39 confession?

40 A. Yes, that's the situation.

41  
42 Q. Within the Jehovah's Witness understanding of things,  
43 what would be the elements or the requirements for  
44 something to amount to a confession?

45 A. Well, someone confesses.

46  
47 Q. As simple as that?

1 A. Well, I guess you can have different settings, but if  
2 somebody came to me personally and confessed, I'd consider  
3 that as a confession. If it was a serious matter that we  
4 were dealing with and there was a judicial committee and  
5 the person confessed to what, in fact, was some wrongdoing,  
6 or whatever, that would be a confession.

7  
8 Q. Let me clarify it. In the first example you gave, if  
9 someone came to you, I take it that's you as an elder?

10 A. Yes, that's what I mean.

11  
12 Q. So it would need to be to an elder or - an elder of  
13 the organisation, not someone else - would that be one of  
14 the elements?

15 A. Yes, that would be one of the elements.

16  
17 Q. And would another element be that the confession was  
18 made confidentially; in other words, that the person made  
19 it in circumstances where a confidence attached to it?

20 A. In circumstances of confidence, yes, that would be the  
21 case.

22  
23 Q. Would that include in circumstances where the elder to  
24 whom the confession was made was not going to pass it on to  
25 others?

26 A. Well, that would depend upon the usage, for example,  
27 of the church. For example, if, in fact, a confession had  
28 been made about a very serious matter, the usage of the  
29 church in the context of that would be to mention to the  
30 Body of Elders that a very serious matter - broadly the  
31 nature of that wrongdoing, without any details. Then the  
32 Body of Elders would appoint a committee to meet with that  
33 individual. They would then all collectively hear the  
34 confession.

35  
36 Q. And that might then lead to a judicial committee?

37 A. Yes, or that would be - yes.

38  
39 Q. And that would lead to a report to the branch?

40 A. Yes, and the report to the branch would simply set  
41 out - that would be handled in the service department.  
42 They would simply, under the same cloak of confidentiality,  
43 take that, put it in a file, if it was, for example,  
44 something, and then it would be filed there, "child abuse",  
45 permanently.

46  
47 Q. And available for people having the requisite

1 authority or responsibility in the branch to access in  
2 years to come?

3 A. In terms of the service department, those that were  
4 charged with that, yes, that would be the usage of the  
5 church - usage of a confessional structure, yes.

6  
7 Q. And the details would be filed, also, in the  
8 congregation files?

9 A. Yes, basic details, yes. Because now, if - are we  
10 talking about a child abuse matter or just generally?

11  
12 Q. Well, let's be specific about child abuse; you might  
13 as well take that as an example?

14 A. Well, that would be - the branch now, in the service  
15 department, retains all of the files in relation to that.  
16 The congregation there, if they dealt with it, have  
17 sufficient just to be aware of what had happened. But  
18 there would be a notation there, but it would be retained  
19 in the service department.

20  
21 Q. Is it not the case that some report has to be put in a  
22 sealed envelope and kept in a congregation file?

23 A. Yes, a brief little report. Yes.

24  
25 Q. Is the purpose of keeping it in the files so that it  
26 can be referred to in the future, if it needs to be?

27 A. Yes, if that was the case. Yes.

28  
29 Q. That may be elders some years down the track who had  
30 no involvement earlier on?

31 A. Well, the direction is that anyone that opens that  
32 should be one of the people that were involved in handling  
33 the matter. That might not always be possible, but that's  
34 the --

35  
36 Q. What I'm getting to, Mr Toole, as you will have seen,  
37 is really the confidentiality of the confession in the case  
38 of the Jehovah's Witnesses is very qualified, isn't it? It  
39 can end up being a lot of different people who end up  
40 having access to that information?

41 A. That's possible, but in view of the position we've  
42 taken in this country as far as disclosing information, if  
43 the authorities seek information about the particular  
44 confession in relation to child abuse matters, we have been  
45 forthcoming and we've waived any privilege that might  
46 otherwise have existed anyway.

47

1 Q. Of course, that may not always be the case. There may  
2 be circumstances in which you change the position?

3 A. That's potentially the case, yes.  
4

5 Q. Dealing with the question of Working With Children  
6 Checks or analogous checks, I understand that if someone is  
7 nominated to be an elder, then a Working With Children  
8 clearance is sought; is that right?

9 A. Well, they normally would have had one before they  
10 were nominated as an elder, because even as a ministerial  
11 servant they are required to have one before they can serve  
12 in that capacity in those States where it's a requirement.  
13

14 Q. What happens when someone is nominated, or there is an  
15 intention to nominate someone, and they can't get that  
16 clearance?

17 A. They are not appointed.  
18

19 Q. The efficacy of that system, of the Working With  
20 Children Checks and analogous checking systems, of course,  
21 depends upon the authorities having a database of  
22 information with regard to sexual offences; is that right?

23 A. Yes, I understand so.  
24

25 Q. So that they can then reference that database to  
26 decide whether a clearance will be given in a particular  
27 case, or not given?

28 A. Yes.  
29

30 Q. So the efficacy of the system then depends on what  
31 information is furnished to the authorities to be captured  
32 in the database?

33 A. I - that's a corollary, yes, I presume.  
34

35 Q. What I suggest is that if the Jehovah's Witnesses  
36 don't systematically report offenders within their midsts,  
37 then that information does not get to the authorities and  
38 it undermines the efficacy of the system?

39 A. To some degree, but, on the other hand, to report the  
40 matter when they're not required to, if the - if the people  
41 involved, who are the victim in this instance, don't want  
42 it reported, you've got two contrary principles competing  
43 with each other. In actual fact, under those  
44 circumstances, to go and report it anyway, in the face of  
45 someone saying, "I don't want it reported", when there was  
46 no requirement for the minister to report it, basically  
47 means you're walking all over the right of someone to

1 decide what is in their best interests.

2

3 Q. We've traversed that and you've accepted that there  
4 may very well be circumstances in which a person is not in  
5 a position to report, or they require reporting in order to  
6 be protected, so the blanket statement doesn't apply across  
7 the board?

8 A. Yes.

9

10 Q. But, Mr Toole, you'll appreciate there is a  
11 distinction between what the law may require and what is  
12 right and what is wrong. What we are really exploring here  
13 is what is the right way in which these matters should be  
14 handled, with reference to morality. What I'm exploring  
15 is, as it would appear with reference to the Jehovah's  
16 Witnesses' morality, it's not regarded as right to have a  
17 systematic system of reporting credible child sexual abuse  
18 allegations arising in your communities to the authorities?

19 A. The position basically is that it's not right to  
20 overturn someone's right to decide whether they want it  
21 done. Elders are simply not scripturally authorised to  
22 take over the best interests of someone's family.

23

24 Q. Yes, I think we've canvassed that, Mr Toole. There  
25 are circumstances in which the allegation a child may have  
26 will not be reported by his or her parent or guardian, and  
27 others having responsibilities within that community, such  
28 as elders, are in a position to report to the authorities  
29 and protect the child - but you won't do it?

30 A. We would do it if we thought it was necessary to  
31 protect the child, unhesitatingly. If I came across a  
32 situation and the only way that I believed I could protect  
33 a child that was in danger - I would have absolutely no  
34 hesitation at all in going to authorities, even though I'm  
35 not required by a mandatory reporting law.

36

37 Q. So you are saying the only reason why there has never  
38 been such a report is because those circumstances haven't  
39 arisen?

40 A. You're presupposing there's never been a report.

41

42 Q. That's the evidence that is before the Commission thus  
43 far.

44 A. I don't think you can conclude that automatically. As  
45 was pointed out yesterday, there are some - of the cases  
46 that you have, there are some 383 that have had police or  
47 authority involvement in it. The extent to which elders

1 may or may not have reported that, I have no idea, but I do  
2 know that, according to the figures that are produced, some  
3 383 times the authorities have been involved, so I can't  
4 tell you --

5

6 Q. Let's just deal with the 383. That figure was arrived  
7 at by doing a search of words --

8 A. Yes.

9

10 Q. -- in the files for things like "police", "authority"  
11 and so on?

12 A. So the authorities were involved in it.

13

14 Q. Well, they may not have been, because what was  
15 actually written on the document may have said, "Do not  
16 report to the authorities"; the search would have picked up  
17 the word "authorities" and you've counted that in the 383?

18 A. Even so, the point that I'm making, if you divided the  
19 figure substantially, it's still impossible for me to agree  
20 that elders have never gone, because I don't know, but I do  
21 know the authorities have been involved in a number of  
22 those cases.

23

24 Q. For several weeks, now, you've had those figures and  
25 the Royal Commission's analysis of your 1,006 perpetrator  
26 files, and you've not found a single case where there was a  
27 report by the elders or by the branch, other than where  
28 there may have been a mandatory requirement?

29 A. Well, I haven't been looking through the cases and  
30 I haven't been looking through the numbers. All I'm  
31 saying, as a general proposition, to say it has never  
32 happened - it may well not even appear in the file to say  
33 that the elder went; it may just say that - that the  
34 authorities became involved. I don't know what the  
35 circumstances are in every case. I'm not trying to make a  
36 major point out of it at all. I'm just simply saying it's  
37 very difficult to say definitively that elders have never  
38 been involved in reporting a case, because we just don't  
39 have the facts to be able to base that on. But in terms of  
40 mandatory reporting in those files, that's not the case.

41

42 Q. You'll accept there is no evidence of elders ever  
43 having reported other than when they were mandatorily  
44 required to do so?

45 A. I haven't reviewed all the files, but, in simple  
46 terms, I assume - if that's the way the files read,  
47 I assume that must be correct. But I'm not prepared to

1 accept the proposition the elders have never been involved,  
2 when, in fact, I don't have the facts to be able to  
3 substantiate that.

4  
5 Q. Just on the files, you may not have searched the  
6 files, but you've had the opportunity to do so, haven't  
7 you?

8 A. Well, for the last little while I've had hardly the  
9 opportunity to do anything. In responding to the requests  
10 of the Royal Commission we've been working to bend over  
11 backwards to cooperate and hardly had time to turn around.  
12 So that's why I asked someone else if they would do it.  
13 That's what they came back and said.

14  
15 Q. So you did have someone search the files?

16 A. Well, they did exactly what you said there - on those  
17 word things on the files that you had, the figures that you  
18 gave us, yes.

19  
20 Q. Yes. That's in the correspondence I tendered  
21 yesterday.

22 A. Yes.

23  
24 Q. I'd like to take you to tab 115. You'll see this is a  
25 letter from the Australia branch, September 12, 2008, it  
26 says to the "Service Committee". As I understand that,  
27 that is to the service committee of the Governing Body,  
28 would that be right?

29 A. Yes, that would be correct.

30  
31 Q. It was from - you'll see on the second page -  
32 Mr Mouritz and he preceded you as being the senior lawyer  
33 at the branch; is that right?

34 A. No, that's not correct.

35  
36 Q. I apologise. Who was he?

37 A. This is Harold Vivian Mouritz. He's the brother of  
38 the person who was involved in the legal department.

39  
40 Q. And he was a member of the branch committee, was he?

41 A. Yes, he was.

42  
43 Q. Was this a letter you were involved in at all?

44 A. No.

45  
46 Q. You'll see in the third paragraph, on the first  
47 page --

1 A. When I say "wasn't involved", I didn't write the  
2 letter; that's what I mean. There might have been some  
3 discussions with me about certain things, but --  
4  
5 Q. Do you remember were there, or were there not?  
6 A. Yes, there would have been some discussion, but I just  
7 didn't draft the letter; that's all I'm saying.  
8  
9 Q. Okay. You'll see it says:  
10  
11 *You ask ...*  
12  
13 So that's to the Governing Body, "You" the Governing Body,  
14 or the service committee:  
15  
16 *... ask about how we propose to track*  
17 *persons who are accused and/or*  
18 *disfellowshipped for child molestation and*  
19 *other abuse. We intend to continue doing*  
20 *what we have done in the past, that is,*  
21 *maintaining a list of such individuals*  
22 *along with the necessary details of what*  
23 *transpired. All appointments processed by*  
24 *the Service Department are checked against*  
25 *the list of names.*  
26  
27 So there is a list of names, I take it, as referred to in  
28 that letter?  
29 A. My understanding - this is all done in the service  
30 department, but my understanding is they simply use the  
31 case files. So they may have a list of case files, but  
32 they just use the case files that they have. That's their  
33 checking mechanism, as I understand, but I've had no  
34 involvement with that at all.  
35  
36 Q. So there is a list of names?  
37 A. There's a list of cases - the cases that you've got.  
38  
39 Q. Well, there are a number of - there are 1,006 files.  
40 We've produced our own list. I understand there is no  
41 separate list of the files that was produced to us, but  
42 I assume that the branch office, in addressing  
43 correspondence to the Governing Body, takes care to be  
44 accurate in what they say?  
45 A. Well, I'm certain.  
46  
47 Q. And would not say that there is a list of names, if



1 there wasn't a list of names?  
2 A. I assume they are just - I've asked the question of  
3 the service department and that's what I have been told,  
4 that they simply use the case files. So they possibly have  
5 a list of the case files they've got. That would be fairly  
6 logical. But beyond that, I can't help you, because I'm  
7 not involved in that area.  
8  
9 Q. So is there a list of the case files?  
10 A. Beg your pardon?  
11  
12 Q. Is there a list of the case files?  
13 A. I don't know.  
14  
15 Q. A subpoena was issued by the Royal Commission - it's  
16 subpoena number S-NSW-462 - on it looks like 28 May 2015,  
17 in which what was sought was in relation to specifically to  
18 this letter - this letter was identified. What was sought  
19 was, "a list of all individuals who are accused and/or  
20 disfellowshipped for child molestation and other abuse",  
21 and nothing has been produced. Are you able to explain  
22 that?  
23 A. All I can explain is that, on the basis of that  
24 summons, we have complied - we have attempted to comply as  
25 fully as possible. My understanding is there is no list,  
26 as such. They use the case files, which is what you've  
27 got. That's what I've been told.  
28  
29 Q. If there is no list, as such, then the branch  
30 committee is not putting the facts to the Governing Body in  
31 saying there is a list.  
32 A. Well, I can't say what they were putting to them. As  
33 I said, I wasn't involved.  
34  
35 MR STEWART: I call for the list of names referred to in  
36 this document, and perhaps my learned friend can respond  
37 some time later as to just what the position is.  
38  
39 MR TOKLEY: I'm happy to do so, your Honour.  
40  
41 MR STEWART: Q. I just want to take you specifically to  
42 the case of [BCG].  
43 A. Mmm-hmm.  
44  
45 Q. And to tab 38 in volume 1. This is a letter from  
46 [BCK], and that is [BCG]'s eldest sister. It has written  
47 across the face of it:

1                   Attention: Vin Toole  
2                   Private & Confidential.

3  
4                   It has a fax header of 15 October 2002 and the letter  
5                   itself is dated 13 October 2002. Did this letter come to  
6                   you?

7                   A. I believe so.

8  
9                   Q. Do you know how it came to you? In other words, did  
10                  it come to you from [BCK], or did it go to someone else and  
11                  was then sent to you?

12                 A. I don't recall, but I know [BCK] personally, so  
13                  I assume it was just faxed to - to the branch office, but  
14                  I can't tell you specifically how it got to me.

15  
16                 Q. If you read that opening paragraph where she says:

17  
18                   *I am writing about some concerns that I*  
19                   *have about my father ... I am concerned*  
20                   *that he may still have contact with young*  
21                   *children in his congregation and they may*  
22                   *be in danger of being abused by him.*

23  
24                  Perhaps we should just, on the chronology, understand that  
25                  at the time of this letter, October 2002, [BCH] had been  
26                  reinstated, having been reinstated in November 1992.

27                 A. That's what I understand.

28  
29                 Q. She goes on:

30  
31                   *I'm sure not many in his congregation are*  
32                   *aware of his attitude toward pedophilia and*  
33                   *may unknowingly expose their children to*  
34                   *risk. As you are most probably aware, he*  
35                   *has had a long history of abusing*  
36                   *children - starting with myself when I was*  
37                   *very young ... and even though, after*  
38                   *learning the truth from the bible, and*  
39                   *bringing his life into harmony with it for*  
40                   *a time, he later allowed himself to other*  
41                   *incidents.*

42  
43                  And she goes on. What did you do in response to this  
44                  letter, do you recall?

45                 A. No, I don't specifically recall.

46  
47                 Q. Do you recall that, at that time, [BCH] was at the

1 Loganholme congregation?

2 A. I don't think I had any idea where he was at that  
3 time.

4  
5 Q. But you would have been able to find out very easily?

6 A. Yes, I could.

7  
8 Q. Do you recall whether you did find out?

9 A. No, I would only say what would have been my practice.  
10 If I received a letter like this, I would have taken it to  
11 the service department and then they would have dealt with  
12 the matter, because that's their - that's their role.

13  
14 Q. If you look at the next tab, tab 39, this is now  
15 10 days later, and again it's addressed "Private and  
16 Confidential" to your attention from [BCK]. Did you  
17 receive this letter?

18 A. Did I?

19  
20 Q. Receive this letter?

21 A. Yes, I did, I believe.

22  
23 Q. She says:

24  
25 *In my letter dated October 13 2002, I spoke*  
26 *about how my father has abused my two*  
27 *sisters ...*

28  
29 referring to the younger sisters --

30  
31 *[one of whom] has spoken to me about what*  
32 *my father did to her and because this*  
33 *matter has not been dealt with - I feel*  
34 *I have an obligation to let you know what*  
35 *she told me.*

36  
37 Then she details what she'd been told regarding a very  
38 serious sexual assault; would you agree?

39 A. Yes.

40  
41 Q. What did you do in response to this letter?

42 A. Again, I don't recall, but my practice would have been  
43 just to take that up to the service department.

44  
45 Q. These are very serious matters that were being brought  
46 to your attention, weren't they?

47 A. The letter is obviously bringing it to my attention.

1  
2 Q. The underlying concern in those letters was a current  
3 concern with regard to child safety?

4 A. And I was also aware that there was a court case going  
5 on at that time involving the very issues that, in  
6 principle, are being raised in these letters.

7  
8 Q. Did you follow up with the service desk as to what had  
9 been done - whether anything had been able to be achieved?

10 A. I don't recall.

11  
12 Q. Mr Spinks yesterday explained that the reference on a  
13 letter to "LLC" is a reference to the legal department; do  
14 you agree with his evidence?

15 A. Yes, that's right.

16  
17 Q. I will show you tab 40. You will see this is a letter  
18 a week or so later to "The Presiding Overseer" at the  
19 Loganholme congregation, and the reference is "LLC".  
20 I take it that came from the legal department?

21 A. I've seen that letter. I looked at it in the bundle.  
22 That is the symbol that I used. I don't recall writing  
23 this letter. I must have had some input into it, or it  
24 wouldn't have my symbol on top, but I don't disagree with  
25 the contents.

26  
27 Q. What this letter does, Mr Toole, is it asks the  
28 Loganholme congregation to look into the position of [BCH]  
29 and to appoint two elders to approach him and inform him of  
30 various things, and that he should be asked to explain, and  
31 so on, as an investigation preceding a possible judicial  
32 committee, is that not so?

33 A. Based on the fact that he's supposedly - according to  
34 paragraph 2, is it? - that he's actually on the public  
35 record of pleading guilty to these charges.

36  
37 Q. What this suggests, Mr Toole, is that what you did in  
38 response to the two letters is you wrote this letter to the  
39 congregation; you didn't take the letters to the service  
40 department?

41 A. No, I would never deal with a matter - this is a  
42 service department matter. But because it's a court case  
43 on foot, they no doubt came and discussed it with me.  
44 Maybe I produced a rough draft that was finalised, but  
45 anything to do with child abuse is service related.

46  
47 Q. Mr Toole, this letter carries your reference and it

1 deals with legal matters. You seem to be trying to  
2 distance yourself from it and suggest that this came from  
3 the service department?  
4 A. No, I'm not suggesting that. I'm saying it would have  
5 gone through with the approval of the service department,  
6 that's all.  
7  
8 Q. With the approval of the service department, but sent  
9 and signed off by you?  
10 A. Well, I never signed - I didn't sign the letter. It  
11 would have gone through the service department, out to the  
12 congregation.  
13  
14 Q. Approved by you?  
15 A. Well, if I drafted the letter, the whole of the  
16 letter, I would have been happy with it. But when it went  
17 to service, they may well have wanted to revise various  
18 aspects of it.  
19  
20 Q. Do you mean to say that the way in which your office  
21 runs is that there are letters with your reference on them  
22 that you didn't approve?  
23 A. Anything at all to do with child abuse, that's dealt  
24 with by the service department.  
25  
26 Q. That can't be so, because this letter, and many others  
27 in the bundle here, have "LLC", or "LLD", and so on, on  
28 them?  
29 A. Yes, that's true. That's true. But it all goes back  
30 to the service department, because they are the ones  
31 responsible for dealing with these matters. They might  
32 have had some legal input or some input from the legal  
33 department, but, nevertheless, it all goes back through  
34 there because they are responsible. We are really just  
35 assisting them in relation to what they're doing.  
36  
37 Q. In assisting them, this is the way forward that you  
38 were party to - in other words, writing to the  
39 congregational elders and telling them what they should do;  
40 is that right?  
41 A. In this particular instance, that seems clearly what  
42 the letter is saying to do, yes.  
43  
44 Q. There is nothing in here about investigating the  
45 safety of children in that congregation from [BCH] and  
46 taking any steps that might be required?  
47 A. No, there isn't, but it is asking them to directly

1 address a very serious matter.

2

3 Q. If we take a look at tab 41 --

4 A. Yes.

5

6 Q. -- you'll see in January of 2003 you wrote what is, on  
7 the face of it, a memorandum from you. It says:

8

9 *Legal - V. Toole.*

10

11 It is to the service department.

12 A. Yes, that's correct.

13

14 Q. So this did actually come from you?

15 A. Yes, no question about that; I remember that.

16

17 Q. And dealing further with this question of [BCH] and  
18 his history in the Jehovah's Witness Church - not so?

19 A. Yes.

20

21 Q. You conclude at the end, if we can look at page 3 -  
22 you will agree that you identify that the concern now is  
23 not about the child sexual abuse itself, but about whether  
24 [BCH] is lying about it?

25 A. No, I disagree entirely.

26

27 Q. Could you explain why?

28 A. The issue here - right at the very outset of that  
29 memorandum it spoke about some documents that had been  
30 shown to me. I don't know what they are, I can't remember,  
31 so obviously it was discussing something that had  
32 transpired from the committee up there. But what I'm  
33 saying here is the primary issue is this man is lying about  
34 abusing his daughter. This man has already admitted to  
35 abusing his daughter and now he's denying it. Like, the  
36 context of this particular memo is to show he's lying about  
37 abusing his daughter.

38

39 Q. I thought that's what I put to you, the principal  
40 issue you determined there is - it says in the last line,  
41 your conclusion:

42

43 *The primary issue before the present*  
44 *committee is the charge of lying.*

45

46 A. But you didn't actually put it to me quite way.

47 That's not what I said - that's what you said. I said it's

1 lying about abusing his daughter, not just simple lying.  
2 He's actually lying about abusing his daughter. So the  
3 context - it's the lie in the context of abusing his  
4 daughter. This is really serious. This man had abused his  
5 daughter, shockingly, he had admitted it.

6  
7 Q. Plural, daughters?

8 A. And then, now, he's compounding the whole thing by now  
9 going back and denying that he actually abused his  
10 daughter.

11  
12 Q. I have to say, I find it very hard to see the lying  
13 about it as nearly as serious as the fact of the abuse  
14 itself?

15 A. Well, the fact of the abuse itself is incredibly  
16 serious.

17  
18 Q. But, more to the point, why was this a legal matter?

19 A. I presume service had come and asked me some questions  
20 about it, so I sent them back that memo, really quite  
21 clearly showing this man's history, what he'd actually  
22 done, according to what the elders had said, and just  
23 making sure they were very aware of this man's shocking  
24 behaviour and his denial of all this.

25  
26 Q. Because it's not clear to me, at least, why a person  
27 lying to congregational elders about conduct that he's been  
28 engaged in is a legal matter or a criminal matter?

29 A. I think the situation was the service department would  
30 have been very conscious of the fact that this man is in  
31 the middle of a court case, and they would have obviously  
32 come to sort of raise it in that context. But, please,  
33 whatever you do, don't conclude that this wasn't a serious  
34 matter. The context of that is this man had admitted to  
35 abusing his daughter, and now he was denying that he  
36 actually did it. He's actually compounding the treatment  
37 he'd given to his daughter.

38  
39 Q. The conclusion, I suggest, is that you take the lying  
40 about it more seriously than the abuse itself?

41 A. Absolutely not.

42  
43 MR STEWART: Those are my questions of this witness.

44  
45 THE CHAIR: Does anyone else have any questions?

46  
47 MS GALLAGHER: I have a few.

1  
2 MS DAVID: Yes, your Honour.

3  
4 THE CHAIR: I see more people rising. I think we might  
5 take the morning adjournment then.  
6

7 **SHORT ADJOURNMENT**

8  
9 THE CHAIR: Who is first?

10  
11 **<EXAMINATION BY MS GALLAGHER:**

12  
13 MS GALLAGHER: Q. Mr Toole, my name is Gallagher and  
14 I represent [BCB] before the Commission.

15 A. Yes.

16  
17 Q. If I might just ask you in relation to Western  
18 Australia, are you aware of the situation as regards the  
19 concept of misprision of felony? Is that a statutory  
20 offence or does it remain a common law offence, are you  
21 aware?

22 A. I am aware of that, but I don't have a lot of intimate  
23 knowledge of it.  
24

25 Q. You know [BCB] came from a house in Western Australia?

26 A. Yes.  
27

28 Q. The situation in New South Wales in relation to the  
29 concept of misprision of felony is that it is now contained  
30 in a statute, the Crimes Act - you're aware of that, aren't  
31 you?

32 A. Yes.  
33

34 Q. It's section 316 of the Crimes Act of New South Wales;  
35 that's correct, isn't it?

36 A. I understand so.  
37

38 Q. Have you been called upon to give advice regarding  
39 that section?

40 A. No, I have not.  
41

42 Q. I was just wondering if I could explore with you -  
43 I'll just turn up the page reference. Mr Toole, you  
44 indicated at page 15763 at line 12:

45  
46 *Elders do not have the scriptural authority*  
47 *to take away the right of an individual to*



1                   *decide whether or not they want to pursue*  
2                   *the matter or not.*

3

4           Do you remember giving that answer a moment ago to --

5           A.    Yes.

6

7           Q.    -- Mr Stewart.  Of course, you're familiar, I assume,  
8           with Galatians - I think I'm pronouncing it correctly -  
9           6:5?

10          A.    Yes.

11

12          Q.    Which indicates "for each one will bear his own load".  
13          That's a correct quote; do you agree?

14          A.    Yes.

15

16          Q.    Is that what you were referring to when you indicated  
17          there that elders do not have the scriptural authority to  
18          take away the right of the individual?

19          A.    That's one of the scriptures.  Other scriptures - the  
20          principle of headship, family autonomy.

21

22          Q.    "Headship"?  As to --

23          A.    The family as a unit.  We don't have the right,  
24          scripturally, to invade a family and start dictating what  
25          they do or don't do.  They've got their right.

26

27          Q.    Of course, the perpetrator may be within the family  
28          unit, though - that's a distinct possibility, isn't it?

29          A.    Yes, that's true.

30

31          Q.    So you're saying that there will be some guardian who  
32          can take on the role of assisting the abused?

33          A.    No, my understanding is that in a situation as you  
34          describe it, the elders would deal with the service  
35          department - and, as I said, I'm not directly involved in  
36          this, but - in terms of working out what they needed to do  
37          to be able to ensure the child is protected.  So they would  
38          work with the guardian/parent.

39

40          Q.    If there was one?

41          A.    If there was one.

42

43          Q.    In relation to obligations, you understand, don't you,  
44          that section 316 effectively creates an obligation upon an  
45          individual who comes to know or believe that a criminal  
46          offence has occurred - do you understand?

47          A.    I understand.

1  
2 Q. So, for example, in a judicial committee, if the two  
3 elders, or perhaps three, each individually, obviously,  
4 came to hold the belief or know that an offence had been  
5 committed, arguably, they are obliged under section 316  
6 each, individually, to report the matter to the  
7 authorities. Do you understand that concept?

8 A. Well, our understanding, if I can just explain, has  
9 been that the mandatory reporting legislation in each of  
10 the States dictates who is responsible to report child  
11 abuse matters and who is not. It designates who they are  
12 or the class of persons, and it also designates the  
13 circumstances under which those particular offences need to  
14 be reported. That has been our understanding.

15  
16 Coming to this Commission and hearing what has been  
17 said here has been quite a wake-up call for me, I can  
18 assure you, because we've operated under that  
19 understanding, that that was the dominating or the  
20 prevailing legislation that governed what was to be done in  
21 relation to reporting child sexual abuse. Having raised  
22 the question now, here, as to whether or not there are  
23 criminal laws that have an overarching or an overreaching  
24 obligation of mandatory reporting, in addition to the  
25 legislation that has actually been specifically designated  
26 as mandatory reporting legislation, is something that I can  
27 assure you we're going to look at very carefully.  
28 Immediately this particular hearing is over, we're going to  
29 instruct independent senior counsel and ask them to give us  
30 clear legal advice on what the position is right throughout  
31 Australia in relation to that, and any obligations that  
32 arise in relation to those laws we will certainly comply  
33 with.

34  
35 THE CHAIR: Q. Mr Toole, the starting point for the  
36 discussion is it's not really mandatory reporting that's  
37 involved, which is a whole scheme in relation to particular  
38 offences or events; but this is the criminal law saying, in  
39 some places, you have an obligation, when you know about a  
40 crime, to report the crime. It's quite a different  
41 character?

42 A. I recognise that, your Honour.

43  
44 Q. Do I then understand that previously the Jehovah's  
45 Witnesses didn't realise that this sort of law existed?

46 A. Well, we realised the law existed, but we were under  
47 the understanding when the government specifically

1 legislated to deal with the matter in question, which is  
2 mandatory reporting, that particular law was the governing  
3 law. Now, if we were wrong on that, we accept that, and  
4 that's why we're going to seek clear advice on the matter.  
5 And so it's a complicated situation, I recognise, but we  
6 will certainly look at it and address the matter.

7  
8 MS GALLAGHER: Q. So if you receive advice from senior  
9 counsel that 316 is akin to mandatory reporting, or  
10 mandates that a report be made if knowledge or belief is  
11 held, then you would, I assume, in some way try and create  
12 some literature that made that plain to the congregation?  
13 A. We have no qualm at all about mandatory reporting. If  
14 the government wants us to report every allegation of sex  
15 abuse that - of child abuse that we ever hear, we're more  
16 than happy to do it. But the problem we have is,  
17 scripturally, elders don't have the right to take away that  
18 right to decide what's in the best interests of the family  
19 from the family. If the law requires us to do it, we have  
20 no hesitation in doing it.

21  
22 Q. Well, sir, the law has, since 1990, required you to do  
23 that. That's when this section was created. Before that,  
24 it was misprision of felony. Do you understand that to be  
25 the position?

26 A. I understand what you're saying, and my response to  
27 that was that we were under the understanding that the  
28 government had legislated specifically to deal with the  
29 area of mandatory reporting.

30  
31 Q. When you say "we", who are you talking about?

32 A. I'm talking about as an organisation.

33  
34 Q. But you've made it plain - and forgive me if I've  
35 misinterpreted your evidence - you really haven't been  
36 providing legal advice in a significant way to the  
37 Jehovah's Witness congregation generally in Australia; is  
38 that right?

39 A. What did you mean by the question, just for me to  
40 understand?

41  
42 Q. I withdraw the question. On issues of legal  
43 interpretation and advice of that nature, you indicate that  
44 you're going to go to senior counsel about this particular  
45 issue?

46 A. Yes.

1 Q. Have you done that in the past in relation to issues  
2 that have arisen - you've sought independent legal advice?  
3 A. Not on this issue at all. We have on other issues but  
4 not on this issue, because we were under the understanding  
5 that the mandatory reporting legislation as it existed  
6 actually determined exactly who had the obligation to  
7 report. Now, we may well have been wrong on that and, if  
8 that's the case, we'll accept the responsibility. But we  
9 now - I can assure you, we'll follow it up to make sure  
10 clearly what the position is.

11  
12 THE CHAIR: Q. When you say, "we were under the  
13 understanding", do you mean you were?

14 A. Well, me, yes.

15  
16 Q. You as the lawyer?

17 A. Yes, yes.

18  
19 Q. Just to make sure we're all on the same ground, the  
20 mandatory reporting legislation imposes obligations on  
21 identified persons.

22 A. Yes.

23  
24 Q. You understand that misprision, or a statutory  
25 equivalent, imposes the obligation on everyone?

26 A. Yes, I understand that.

27  
28 Q. Have you always understood that?

29 A. Well, I understood that it was subjugated or - when  
30 the government passed legislation that specifically dealt  
31 with mandatory reporting, if, in fact, the obligation arose  
32 under another statute, you wouldn't need this particular  
33 statute.

34  
35 Q. They are quite different things.

36 A. Yes.

37  
38 Q. The mandatory reporting legislation is a scheme that  
39 requires identified people to report to identified bodies.  
40 Misprision, or section 316 as it is in New South Wales, is  
41 a general obligation on every citizen --

42 A. Yes.

43  
44 Q. -- to report to the police in relation to a criminal  
45 offence?

46 A. Well, I have become much more aware of it in the last  
47 few days, and that's why we'll be taking very deliberate

1 action to address the matter.

2

3 MS GALLAGHER: Q. How will it sit with Galatians 6:5?

4 A. How will it sit with Galatians 6:5?

5

6 Q. Yes, because it will effectively be against a  
7 scripture --

8 A. No.

9

10 Q. -- that has continually been relied upon during the  
11 course of this Commission, that each person bears their own  
12 load. So it will be necessarily in direct contradiction,  
13 won't it?

14 A. No, it won't. If I could explain why - that scripture  
15 that I read says that we have to be obedient, as  
16 Christians, to the superior authorities.

17

18 Q. Romans?

19 A. So if, in fact, the superior authorities have a law  
20 that says this is what we need to do, well, that's the end  
21 of it; we'll obey.

22

23 Q. If I could go to tab 131A at Ringtail 0013,  
24 paragraph 14 --

25 A. I haven't got it yet.

26

27 Q. I beg your pardon. Have you got it there?

28 A. Yes.

29

30 Q. Mr Stewart touched on the sentence commencing "Strict  
31 confidentiality" in paragraph 14:

32

33 *... must be maintained to avoid unnecessary*  
34 *entanglement with secular authorities who*  
35 *may be conducting a criminal investigation*  
36 *of the matter.*

37

38 I just want to clarify what that means. Does it mean that  
39 there could be, effectively - if a matter had been reported  
40 to the police, so the secular authorities are dealing with  
41 it, but if the elders wanted to conduct an investigation in  
42 preparation for a judicial committee, does that advocate  
43 that they can, but they effectively keep it strictly  
44 confidential?

45 A. The advice that I give elders when they call -  
46 sometimes the police are already involved in the matter,  
47 and that's how the elders first find out that there's even

1 an allegation. The advice that I give elders when they  
2 call in, in that situation, is that if the police are  
3 involved, don't do anything at all until their  
4 investigation is completed, because we don't want in any  
5 way to interfere with their investigation.  
6

7 When they go and speak to the family or the victim, as  
8 I direct them, if, in fact, that person wants to take  
9 action, the same advice would apply. We don't want to get  
10 involved and in any way influence a police investigation.  
11

12 Q. Yes, certainly. You touch upon that in your  
13 statement, don't you?

14 A. Yes.  
15

16 Q. If the matter is with the police, you, effectively -  
17 have you personally instructed people not to seek to  
18 interview anybody?

19 A. Yes, I have.  
20

21 Q. The accused or the accuser?

22 A. Yes, I have.  
23

24 MS GALLAGHER: Thank you, your Honour.  
25

26 <EXAMINATION BY MS DAVID:  
27

28 MS DAVID: Q. Mr Toole, I'm Ms David and I represent  
29 [BCG] in these proceedings.

30 A. Hi.  
31

32 Q. Just on the issue of reporting, in the situation where  
33 there is a child who has been abused by her father, for  
34 example - as in the case of [BCG] - in that situation, and  
35 the mother was of the view that the matter should be  
36 reported but the father - sorry this is a poor example. In  
37 another situation where a child has been abused and the  
38 mother of the child wanted to go to the authorities, but  
39 the father didn't, what would the situation be there?

40 A. Well, the mother is then the protective guardian of  
41 that child. That child needs the mother to be protective.  
42 If she wanted to go to the authorities, that's her right  
43 absolutely.  
44

45 Q. Even against the wishes of her husband?

46 A. Absolutely. Because the concept is "relative  
47 subjection". If her husband is asking her to do something

1 that God says she shouldn't do, she wouldn't obey him in  
2 any way.

3

4 Q. Would the elders give advice on that to that couple,  
5 to that effect, that that was her right, independent --

6 A. Absolutely.

7

8 Q. -- of the father?

9 A. It's a scriptural principle.

10

11 Q. In the situation where you do have a child who is  
12 abused by their father, as in the case of [BCG], and there  
13 was no effort or attempt by the mother to go to the  
14 authorities or to the police, do you have a procedure?  
15 Nothing occurred then, but do you have a procedure now that  
16 would enable - a process whereby someone is appointed  
17 in loco parentis, as a guardian for that person, to make  
18 that decision?

19 A. No, we don't have a procedure, but what you actually  
20 have is an interchange between the service department and  
21 the elders that are on the spot dealing with the matter,  
22 working out how best to be able to ensure that that child  
23 is protected. But I can assure you, whatever needs to be  
24 done to protect a child, we'll do it. If it means going to  
25 the police, we would have no hesitation in going to the  
26 police.

27

28 Q. What about the situation where you do have a young  
29 child and the parents have decided not to exercise, as you  
30 call it, their absolute right to go to the authorities, and  
31 that child was, for example, a young child of five or six.

32 A. Yes.

33

34 Q. The child is obviously going to become more aware and  
35 independent of her parents - he or she - as they grow. How  
36 do you deal with that situation? Is there a process to  
37 ensure that that child can, at some point, make a  
38 complaint, or knows that they have that right?

39 A. Well, normally - it's a hypothetical situation, but  
40 normally they'd have grandparents or other people.  
41 Firstly, we'd have to come to know about it and, if we came  
42 to know about it, usually that would happen because a child  
43 is talking to maybe a relative, a grandparent. As soon as  
44 they became aware of it, they would mention to the elders  
45 that there's a situation here. Then the matter would be  
46 dealt with appropriately to be able to ensure the child was  
47 protected. Now, it may well be, in those circumstances, if

1 it was a grandparent, then, the elders would help the  
2 grandparent realise that if the parents themselves weren't  
3 going to protect their own child - which would be pretty  
4 shocking behaviour, but if they weren't - then it would be  
5 the responsibility of the grandparent, maybe, to step in.  
6 Maybe they could go along to the authorities with - but if  
7 the situation was such that there was no other way that we  
8 could find to protect that child, we would have no  
9 hesitation in going to the authorities.

10  
11 Q. My question is more directed to how people who have  
12 been subjected to abuse become aware of their absolute  
13 right to go to the authorities. What process, if any, is  
14 there to ensure that people subjected to sexual abuse -  
15 young people - have that awareness that they can go to the  
16 authorities?

17 A. I would think that every Jehovah's Witness in the  
18 country who is of a reasonable age and experience - they go  
19 to school, they do all this - would be fully aware of the  
20 fact that if they wanted to pursue it, they would have an  
21 absolute right to do so.

22  
23 Q. Given that your teachings really discourage any  
24 relationships outside of relationships with Jehovah's  
25 Witnesses, don't you think a young child will grow up  
26 thinking that that is not an option, unless it was clearly  
27 pointed out to them that that was an option which would be  
28 wholeheartedly supported by the congregation?

29 A. We don't isolate ourselves. Children have - they go  
30 to school, they have relationships with teachers, they have  
31 a relationship with a whole host of people. To say that we  
32 live in an isolated community, I think, is really reading  
33 it a little bit strongly. We obviously want our children  
34 to associate with people who are going to help them to  
35 maintain a proper moral standard, and obviously, as  
36 responsible parents, you want to be sure who they are  
37 associating with, but they don't live in a cocoon.

38  
39 Q. They are taught, aren't they, as they are growing up  
40 that people other than Jehovah's Witnesses are worldly  
41 people?

42 A. They are probably taught that people who aren't  
43 Jehovah's Witnesses, many of them, may well not share the  
44 same values, although many do in many respects.

45  
46 Q. It's the case, isn't it, that they are not supposed to  
47 associate closely with people outside of the congregation,



1 are they?

2 A. Well, if someone is a young person, as you describe  
3 them, they are spending probably five or six hours a day  
4 with people who don't share their same faith values. So  
5 they are obviously associating with them at school,  
6 playgrounds and various things, yes.

7

8 Q. Just on that topic, in relation to sex education, for  
9 example, do the Jehovah's Witnesses today have a policy  
10 against the children of Jehovah's Witnesses learning in  
11 secular schools about sex education through that secular  
12 school system?

13 A. That's a decision entirely for the family to make.

14

15 Q. Are you aware that it is a practice of families to  
16 write to the school to say that their children should not  
17 receive sex education?

18 A. No, I'm aware of the opposite, because our literature  
19 says really it's a matter for you to decide, as families.  
20 It's something - the parents have to decide what's in the  
21 best interests of their children, so if they feel it's in  
22 the best interests to have school sex education, so be it.  
23 If they don't feel it, that's their right again.

24

25 Q. Again, for example, in the case of [BCG], she gave  
26 some evidence that she was not able to attend those sex  
27 education classes. So do you see a difficulty in that  
28 particular situation, whereby a young person attending  
29 school would not have the awareness about what behaviour  
30 may be inappropriate?

31 A. Well, I can't really comment on that, but, still,  
32 that's her family's right to choose whether she wants to -  
33 whether they want her or don't want her. Families have to  
34 accept the responsibility for their own wellbeing and their  
35 own children. That's part of being a parent. But you'd  
36 like to think they'd be responsible parents.

37

38 Q. I just want to ask you some questions. If you turn to  
39 paragraph 27 of your statement, please, you were involved  
40 in the preparation of documents and statements for the case  
41 of [BCG]?

42 A. Yes.

43

44 Q. You've said here that you accepted service on behalf  
45 of a number of elders who were involved in the committees  
46 and the appellate process, in accordance with your  
47 Jehovah's Witness process. You said that you assisted them

1 with the preparation of their statements. What do you mean  
2 by "assisted them in the preparation of their statements"?

3 A. It came - I think it was Mr de Rooy who rang and said  
4 he'd been contacted by the police. I spoke with him and he  
5 explained the situation. I'm not sure whether it was then  
6 or a little after, but he gave me instructions to act on  
7 his behalf. He told me that the particular policewoman  
8 that had contacted him was Natalie Bennett. From my  
9 recall, I rang Natalie Bennett and I said, "What's the  
10 situation? What did you want?" As I recall, she explained  
11 to me what was happening in relation to this matter that  
12 [BCG] was involved in, that she wanted to actually have a  
13 statement from the three elders that were involved in the  
14 initial judicial committee. She also wanted a statement  
15 from those three elders that were involved in the appeal  
16 committee. I said, "I will assist you in the matter." So  
17 that's what I did. I went and obtained statements, but  
18 only draft statements, from each one of those elders, and  
19 then either I sent them directly to Natalie Bennett or they  
20 did, but I didn't finalise any of those statements. They  
21 were finalised by the police. I don't think, from memory,  
22 any documents were subpoenaed. I think Natalie Bennett  
23 spoke to me on the telephone and explained what documents  
24 she wanted and I just arranged for them to be produced.  
25

26 Q. Just in relation to that, you assisted in the  
27 preparation of the draft statements?

28 A. Yes.  
29

30 Q. That would mean substantial information was put in  
31 those draft statements?

32 A. I put in the statements what the elders told me.  
33

34 Q. You had been involved in the internal processes of the  
35 Jehovah's Witness procedures in relation to the case of  
36 [BCH] at that stage, hadn't you?

37 A. No, not at all. That was the first I heard about it.  
38

39 Q. Did you not think that there was a conflict of  
40 interest between you assisting in the preparation of  
41 statements from witnesses to a trial that involved a number  
42 of elders from your congregation?

43 A. I didn't see it that way. I was just taking a  
44 statement by way of being of assistance to the police.  
45

46 Q. Did you not see that, as pointed out I think in  
47 document 131A that's been referred to by counsel assisting

1 and Ms Gallagher, that in relation to confidentiality one  
2 of the concerns is the civil liability that may flow to  
3 your congregation as a result of any internal processes?  
4 A. I don't understand the question, I'm sorry.

5  
6 Q. What I'm suggesting to you is that do you not see that  
7 there is some conflict between your role in protecting, if  
8 I put it that way, the congregation against civil liability  
9 suits, and the witnesses providing a full and frank  
10 statement to the police?

11 A. I didn't see the slightest conflict in that matter.  
12 I was just simply helping those elders and assisting to  
13 take down their draft statement and ensuring that it went  
14 to the police. And I understood that Natalie Bennett  
15 finalised every one of those statements. She would have  
16 talked to the elders. There would have been a full and  
17 frank disclosure of whatever they recalled. I didn't see  
18 any conflict at all. I wasn't trying to protect anyone.  
19 I was trying to be of assistance.

20  
21 Q. I'm not suggesting there was a conflict. I'm just  
22 suggesting the appearance of a conflict - that the  
23 statements made and assisted by someone whose primary role  
24 is to work for the Jehovah's Witness Church -  
25 congregation - might appear to be in conflict with a person  
26 who had clearly expressed, over time, her dissatisfaction  
27 with the church, with the congregation's handling of  
28 [BCH]'s case?

29 A. I was completely unaware of [BCG]'s situation. I had  
30 never met her. This is the first I actually heard about  
31 this matter when I was contacted by Ron de Rooy.

32  
33 Q. Shortly thereafter you were involved with  
34 correspondence - received correspondence, for example, in  
35 relation to her sisters - from her elder sister that was  
36 shown to you before. That was in 2002, as I recall - 2003?

37 A. 2003, was it, or something like that, yes.

38  
39 Q. You provided that to the police, did you, that  
40 correspondence that you received?

41 A. I think she actually sent me a copy of her police  
42 statement.

43  
44 Q. No, no. My question to you was: did you send her  
45 letter to the police?

46 A. No, I didn't.

1 Q. Did you not think that that would be of significant  
2 assistance during the course of a trial against [BCG]?  
3 A. Well, the letter contained about --  
4  
5 Q. Sorry, [BCH], I apologise.  
6 A. The letter contained a complete police statement by  
7 that individual, which declared everything and sundries, as  
8 I understood. This case was already - I'm not sure whether  
9 it was the first case or the second case, but I understood  
10 that the police had all that information.  
11  
12 Q. Well, isn't this the problem, though, the conflicts  
13 that can occur? You understood that the police had that  
14 information. You're not in a position to really know  
15 exactly what the police had --  
16 A. No, but if the police have a five-page statement,  
17 I presume that - they've got the five-page statement.  
18 They've interviewed this particular person.  
19  
20 Q. Do you recall whether that statement had in it all the  
21 information about the --  
22 A. I don't.  
23  
24 Q. You don't recall that?  
25 A. No.  
26  
27 Q. So what I'm suggesting to you is that this is where  
28 the conflicts can arise, can't they? You give some  
29 confidentiality to the correspondence that you receive from  
30 a member of your congregation, being the elder sister of  
31 [BCG] and the elder daughter of the accused, and you don't  
32 do anything with it?  
33 A. The letter actually says that she has been contacted  
34 by Natalie Bennett, as I recall. So she's obviously had  
35 full and complete discussions, one would think, with the  
36 police. She's made this statement which has been settled  
37 or finalised by the police. My understanding was whatever  
38 information she wanted it to contain or state would have  
39 been shared with the police or in that statement. But if  
40 I can just mention, there wasn't the slightest question  
41 that I'm trying to protect anyone in this instance at all.  
42  
43 Q. No, I'm not suggesting to you that you did anything to  
44 protect --  
45 A. Right, thank you.  
46  
47 Q. What I'm suggesting to you is the appearance of

1 conflict, and you would be very well aware of that concept,  
2 that you must avoid any appearance of conflict between the  
3 interests of your congregation and the interests of  
4 somebody who was, at that time when she was making the  
5 complaint, outside your congregation - when she made the  
6 complaint to the police?

7 A. I would have thought the help that I gave was  
8 assisting her. As a result, six men went and gave evidence  
9 in her case, I understand; the man was convicted,  
10 I presume, on some of the evidence they produced.

11  
12 Q. To avoid a conflict, wouldn't have been better  
13 actually just to send them to the police so that the police  
14 could take their statement?

15 A. That's a question of judgment, but Natalie Bennett,  
16 I understood, was very happy that I was preparing those  
17 draft statements. Then she's got something that she can  
18 sit down and discuss with those men. She finalised them,  
19 I didn't.

20  
21 Q. Another option would have been to send it to someone  
22 outside - a lawyer outside the congregation?

23 A. I guess, in hindsight, there's all sorts of  
24 possibilities, but I didn't see that in any way, shape or  
25 form I was doing anything inappropriate in what I did.

26  
27 Q. Do you agree that that is an option, though, to send  
28 it outside the Jehovah's Witness --

29 A. Absolutely.

30  
31 Q. Coming back to the absolute right of a member of the  
32 congregation to report to the authorities, a counsellor or  
33 a psychologist wouldn't be classified necessarily as an  
34 authority, would they?

35 A. I don't understand your question.

36  
37 Q. All right. Do you ensure that a person complaining of  
38 child abuse is well informed about his or her absolute  
39 right to go to a psychologist, for example, or a  
40 counsellor, to obtain support and assistance?

41 A. I can't really answer the question, because I haven't  
42 been involved that way. But there is absolutely no  
43 prohibition, dissuadement [sic] or anything as far as  
44 that's concerned. If someone wants to go, that's their  
45 prerogative entirely.

46  
47 Q. I'm not talking about prohibition or persuasion [sic].

1 I'm asking you is there any policy that you're aware of  
2 that positively states that the elders should instruct or  
3 advise the people who have made a complaint of abuse that  
4 they have the absolute right to go to a psychologist, for  
5 example?  
6 A. No, I'm not.  
7  
8 Q. Do you believe that that should be something that  
9 should occur?  
10 A. Well, there are a lot of things that have come out of  
11 this Royal Commission hearing that I'm sure will be  
12 considered very carefully and very considerably over time.  
13  
14 Q. Is that something that you believe should occur?  
15 A. Me personally?  
16  
17 Q. Yes.  
18 A. I guess that would depend on the circumstances, but  
19 there's nothing wrong or inappropriate about it at all.  
20  
21 Q. Does it go against your scriptures to speak to  
22 counsellors outside?  
23 A. No, not at all. People have an absolute right to  
24 speak to who ever they want to.  
25  
26 Q. When either the victim or the survivor of the abuse,  
27 but the person who has been abused, when they are being  
28 informed of their absolute right to go to the police, for  
29 example, are they made aware of what might happen to their  
30 complaint if it is not made quickly? I'll put it this way:  
31 are you yourself aware of how delay in reporting a case of  
32 abuse can impact upon the subsequent trial?  
33 A. Yes, I am.  
34  
35 Q. What is your understanding of the difficulties?  
36 A. Well, obviously, the further you are removed from the  
37 event, the more difficult evidence is, people's  
38 recollections, as has obviously been evidenced at this  
39 hearing here. People are trying to remember events that  
40 took place 26 years ago. Sometimes I have difficulty  
41 remembering what I had for breakfast yesterday. It's  
42 difficult, I appreciate it.  
43  
44 Q. When you're giving that advice to either the parents  
45 or the person who has actually been abused, is that  
46 explained to them?  
47 A. I don't believe it is, but it is something that we

1 could take on board.

2

3 Q. In the process, do you understand - clearly, I think  
4 you've been watching these proceedings over the last --

5 A. Yes.

6

7 Q. During the course of those proceedings, there has been  
8 a lot of reference to the procedure - the committee  
9 procedure whereby - well, two case study examples, for  
10 example, [BCG] and [BCB] - in [BCG]'s case how petrified  
11 she was in that committee process whereby she had to give  
12 evidence or tell her story in front of her father and three  
13 male elders - you're aware of that?

14 A. Yes, I heard what she said.

15

16 Q. Would you agree that that very process does not lend  
17 itself to a young abused person being full and frank about  
18 the detail of what actually happened to them?

19 A. Absolutely, but I understood the evidence that was  
20 given yesterday by Mr Spinks shows that just simply  
21 wouldn't happen today, unless someone wanted actually to  
22 confront the abuser.

23

24 Q. What I'm getting at is that by choosing to go through  
25 your process - the committee process - if a person who had  
26 been abused chose to go to that process, even if it was in  
27 writing or they took some less terrifying way of doing it -  
28 is it pointed out that, for example, when they finally get  
29 to court, if they haven't given a full and frank --

30 A. If they haven't - sorry?

31

32 Q. If they haven't provided a level of detail in the  
33 committee process, and they are subsequently cross-examined  
34 about a later account which has more detail, that they  
35 could be heavily criticised through that court process?  
36 There are inconsistent statements, you would be well aware  
37 of the difficulties with inconsistent statements.

38 A. Yes.

39

40 Q. Are those matters ever pointed out to the elders when  
41 they are advising people who are abused?

42 A. In answer to your question, it's the same as before.  
43 The instructions are to make sure they are fully aware. As  
44 I understand, the elders don't explain to them the point  
45 that you've made. I've taken that on board and I'll  
46 certainly add that in terms of any advice that I give  
47 anyone in the future so they are made fully aware of that.

1  
2 Q. Would it be a possibility for them to be advised  
3 independently of the elders, for example?  
4 A. Absolutely. Absolutely.  
5  
6 Q. By someone like yourself, of all those particular  
7 outcomes, if they don't make the complaint?  
8 A. If they chose to, I'd be more than happy to assist  
9 them in that way.  
10  
11 Q. What about seeking again - referring them to  
12 outside --  
13 A. What about?  
14  
15 Q. Referring them to outside legal representatives?  
16 A. Absolutely. They are perfectly free to go to who ever  
17 they want to. This is their right. They are not stopped  
18 in any way, shape or form from doing what they feel is in  
19 their best interests.  
20  
21 Q. I want to ask you about one other aspect. As a  
22 Jehovah's Witness, as a soldier of Christ, you are  
23 essentially in a theocratic warfare against those who have  
24 a different view of religion - is that the case?  
25 A. No, I don't think that's the case.  
26  
27 Q. Are you aware of the doctrine of theocratic warfare?  
28 A. No.  
29  
30 Q. Never heard of it?  
31 A. Well, I've heard the expression, but I'm not really  
32 sure what it means.  
33  
34 Q. So you don't know what it means?  
35 A. No.  
36  
37 Q. In The Watchtowers in 1957 and 1960, have you heard  
38 they say that:  
39  
40 *As a soldier of Christ, you are in*  
41 *theocratic warfare and you must exercise*  
42 *added caution when dealing with God's foes.*  
43 *Thus the scriptures show that for the*  
44 *purpose of protecting the interests of*  
45 *God's cause it is proper to hide the truth*  
46 *from God's enemies.*  
47



1 Have you heard of that?

2 A. No, and I've never read 1957 magazine articles, I'm  
3 sorry. I only became a Jehovah's Witness in 1972.  
4

5 Q. But, as a lawyer, you would be aware of such concepts,  
6 wouldn't you - that you can lie to protect Jehovah's name?

7 A. We are truthful. To be a Christian, you have to be  
8 truthful.  
9

10 Q. Is there any occasion when there is a basis for  
11 keeping the truth from outsiders?

12 A. Well, if our congregation was being persecuted, like  
13 what happened in the times of Adolf Hitler and he was  
14 taking people to concentration camps because they wouldn't  
15 join his army and go to war, and somebody came to me and  
16 said they wanted a list of everybody in the congregation,  
17 I wouldn't tell them - I'd like to think I wouldn't anyway  
18 under those circumstances. It might cost me my life, but  
19 I'd like to think that I wouldn't divulge that information,  
20 because I know what the consequences would be for the  
21 people I divulged that about.  
22

23 Q. Is there a concept of malicious lying in the Jehovah's  
24 Witness --

25 A. Well, yes, there is, to some degree, in the sense that  
26 sometimes you can tell what you saw at an event, someone  
27 else says what they saw in the event, and the two stories  
28 don't really agree too well, it doesn't mean that you're  
29 actually lying.  
30

31 Q. With respect --

32 A. But if someone is actually setting out, with malicious  
33 intent, to in fact undermine or destroy, or whatever the  
34 case may be, that's the - in the situation of that memo  
35 that was put to me before, I would say that's a classic  
36 case of malicious lying. This man is deliberately and  
37 maliciously lying about what he did to his daughter and  
38 what he admitted to doing to his daughter.  
39

40 Q. So the example that you gave before, it's not a  
41 question of lying. Honest people can be wrong and --

42 A. Sure.  
43

44 Q. They can. So it's not a question of lying. They have  
45 a different recollection, and it's simply that. I'm just  
46 talking about deceiving, that falsehoods presented to God's  
47 enemies are not considered lies if it's to deceive

1 outsiders to advance the organisation's interests?  
2 A. No, that's - that's - I've never heard that.  
3  
4 Q. Never heard that in your role --  
5 A. No, that's a completely foreign concept to my  
6 understanding.  
7  
8 Q. I just want to ask you something else. When a person  
9 is disfellowshipped, they can still attend Kingdom Hall,  
10 can't they?  
11 A. Yes.  
12  
13 Q. And they can sit up the back of Kingdom Hall?  
14 A. Yes.  
15  
16 Q. And they can enter after the congregation has  
17 entered -- as long as they enter and leave before the  
18 congregation --  
19 A. I don't think there's any strict rule about it, but  
20 they'd normally do that anyway, but they really aren't  
21 associating with the congregation at all.  
22  
23 Q. So there is nothing to prevent, for example, a  
24 disfellowshipped person from attending the same  
25 congregation as the - a person disfellowshipped on the  
26 basis of being a sex abuser, there is nothing to prevent,  
27 in your faith, from attending at that congregation, is  
28 there?  
29 A. No, but if it was going to be offensive to the victim,  
30 there would be a very clear instruction given to them that  
31 this was very inappropriate, because obviously the effect  
32 of that - sometimes you have situations where there has  
33 been an adulterous situation in a marriage or something  
34 like that and you've got someone here and someone here.  
35 Sometimes it is very unpleasant, and the elders would  
36 certainly discuss that with the wronged - or the person  
37 that's wronged the other and ask them if they could make  
38 some other arrangements, out of sensitivity to the person's  
39 feelings.  
40  
41 Q. That's the highest you could ever go. You could go to  
42 that disfellowshipped person and ask them not to come to  
43 the congregation, couldn't you?  
44 A. Yes.  
45  
46 Q. But you couldn't actually tell them - you couldn't ban  
47 them, could you, from that congregation?

1 A. Unless they were causing major difficulties, we  
2 couldn't. It's a meeting that's open to the public. If  
3 they sat there - if - in the extreme example you're  
4 discussing, ultimately I guess it would have to be  
5 considered, but if there was a real problem in that regard,  
6 what would happen is the elders would contact the service  
7 department, they'd discuss it thoroughly and work out how  
8 the principles that we operate would apply in that  
9 situation to be able to address the matter.

10  
11 Q. Would you involve the police in the removal of someone  
12 if they were requested not to go and then --

13 A. We have had people come to Kingdom Halls that have  
14 been creating a disturbance, and we have involved the  
15 police. We have revoked their implied invitation to come,  
16 so they become a trespasser if they're there. We're quite  
17 happy to do that, if that's necessary.

18  
19 Q. Before this Commission, as I understand it, there were  
20 two people from the congregation who were not concerned  
21 whether they took an oath on the Bible or an affirmation.  
22 Are you able to make any comment about why someone, who was  
23 a member of the Jehovah's Witness congregation, would not  
24 automatically think that they would swear an oath on the  
25 Bible?

26 A. If you want my honest opinion, it's possibly the first  
27 time they have ever been put in a forum like this, and they  
28 are frightened and so terrified of the whole experience,  
29 they really probably weren't sure what they should be  
30 doing. So it's a pretty daunting experience for some  
31 people that have never been confronted with it before.

32  
33 Q. Is there any guidance on that from the legal  
34 department?

35 A. No. That's a matter entirely for an individual.

36  
37 Q. Would you find it unusual, though, for someone not to  
38 automatically want to swear on the Bible?

39 A. If it was a considered opinion, they thought about  
40 it quite a lot and they didn't want to swear on a Bible,  
41 and I knew them well enough to ask them, I'd ask them why  
42 not just as a point of interest to satisfy myself, but  
43 there is no hard and fast rules.

44  
45 THE CHAIR: Ms David, there are some devout Christians  
46 who, out of respect for the Bible, won't swear on the  
47 Bible. I'm not sure that this is an issue worth pursuing.

1  
2 MS DAVID: No, I appreciate that, your Honour. Thank you,  
3 your Honour. Thank you, Mr Toole.  
4

5 <EXAMINATION BY MS McGLINCHEY:  
6

7 MS McGLINCHEY: Q. Mr Toole, my name is Ms McGlinchey  
8 and I appear for Monty Baker in these proceedings.

9 A. Thank you.  
10

11 Q. Mr Toole, you've said on a number of occasions in your  
12 evidence that, if it was necessary to protect a child, you  
13 would have no hesitation in going to the police.

14 A. That's correct.  
15

16 Q. Just to be clear, is the effect of your evidence that  
17 you have never in fact done that?

18 A. No, I haven't.  
19

20 Q. Is the effect of your evidence that you have never in  
21 fact advised a member of the Jehovah's Witnesses to report  
22 a matter to the police?

23 A. No, I haven't, because I don't give that advice. The  
24 service department deals with that.  
25

26 Q. Thank you. You have an employed solicitor?

27 A. I have a solicitor that is in my firm, but they  
28 operate on the same basis that I do. We're just members of  
29 the order. She's associated and works under my guidance,  
30 yes.  
31

32 Q. Her practising certificate does note that she works  
33 for your firm?

34 A. Yes.  
35

36 Q. Do you supervise her?

37 A. Yes. When we're doing - when we're doing work in my  
38 capacity as an independent solicitor, yes.  
39

40 Q. She's a member of Jehovah's Witnesses as well?

41 A. Yes.  
42

43 Q. Do you know if Ms van Witsen has ever advised a member  
44 of the Jehovah's Witnesses to report a matter to the  
45 police?

46 A. No, I do not.  
47

1 Q. Have you ever given her any instructions on the  
2 circumstances in which that advice should be given?  
3 A. She doesn't give that advice - well, she doesn't take  
4 any calls in relation to those matters.  
5  
6 Q. Are you the only person in your firm who takes calls  
7 in relation to sexual abuse matters?  
8 A. At the present time, that's the position for the last  
9 few years, that's my role.  
10  
11 Q. Just to be clear, the knowledge that you have to base  
12 the advice - the legal advice that you give, have you  
13 undertaken any other training outside the Jehovah's  
14 Witness?  
15 A. Any?  
16  
17 Q. Any outside training perhaps conducted by the Law  
18 Society, or --  
19 A. In relation to what?  
20  
21 Q. How to deal with matters - legal requirements - to do  
22 with matters dealing with child sexual abuse?  
23 A. No.  
24  
25 Q. You have a fairly heavy burden as a senior lawyer  
26 advising the Jehovah's Witnesses; is that correct?  
27 A. Yes, but I'm advising them in only one area, and  
28 that's their obligations to report under the mandatory  
29 reporting regime. I'm not dealing with child sexual abuse  
30 per se. I'm simply just giving legal advice, like any  
31 lawyer would if you walked into his office and said, "What  
32 obligations do I have in these circumstances to report a  
33 matter in this particular State?"  
34  
35 Q. Just to be clear, have you ever advised, in your  
36 capacity as a lawyer, anybody to report under the mandatory  
37 system?  
38 A. Yes, I mentioned that to counsel this morning I have.  
39  
40 Q. I want to understand how your practice works. Do you  
41 have an office?  
42 A. Yes.  
43  
44 Q. Which you attend on a daily basis?  
45 A. Yes, but I'm - I'm also a corporate lawyer and I do  
46 work along with the branches doing normal administrative  
47 legal related work. But there are times, if I take on a

1 client, then I'll act for them independently.

2

3 Q. A Jehovah's Witness client?

4 A. Any client, but generally it's one of Jehovah's  
5 Witnesses, yes.

6

7 Q. In relation to your supervision of Ms van Witsen, does  
8 she attend the office as well?

9 A. Yes.

10

11 Q. And she works under your supervision?

12 A. Yes.

13

14 MS McGLINCHEY: Thank you.

15

16 <EXAMINATION BY MR TOKLEY:

17

18 MR TOKLEY: Q. Mr Toole, as you know, my name is  
19 Andrew Tokley. I represent the Watchtower Bible & Tract  
20 Society of Australia. I also represent you, Mr Spinks, and  
21 Mr O'Brien. Could I please have the document behind  
22 tab 82. Its Ringtail number is 244. Mr Toole, do you see  
23 what's brought up on the screen?

24 A. Yes, "If your child is abused".

25

26 Q. Yes. Do you understand this to be part of an Awake!  
27 publication?

28 A. Yes.

29

30 Q. Could the screen be scrolled down to see the date on  
31 the bottom. Do you see that it's a publication of  
32 8 October 1993?

33 A. Yes, I do.

34

35 Q. Could we now scroll down a little?

36 A. Down or up?

37

38 Q. Down. If you look at the second column on the  
39 right-hand side?

40 A. Yes.

41

42 Q. Do you see the paragraph beginning "What, though"?

43 A. Yes.

44

45 Q. Do you see it says:

46

47 *What, though, when the abuser is one's own*

1           *beloved mate?*

2

3       A.    Yes.

4

5       Q.    Do you recall being asked questions about what might  
6       happen in a situation in which, for example, the husband is  
7       an abuser of a person?

8       A.    Yes, I do.

9

10      Q.    Do you see what it says:

11

12           *Sad to say, many women fail to take*  
13           *decisive action. To be sure, it is never*  
14           *easy to face the ugly reality of a mate who*  
15           *is a child abuser. Emotional ties, and*  
16           *even financial dependency, can be*  
17           *overwhelmingly strong. The wronged wife*  
18           *may also realise that taking action could*  
19           *cost her husband his family, his job, his*  
20           *reputation.*

21

22      A.    Yes.

23

24      Q.    It continues:

25

26           *The hard truth is, though, that he may be*  
27           *just reaping what he has sown. Innocent*  
28           *children, on the other hand, stand to lose*  
29           *much more if they are not believed and*  
30           *protected. Their whole future is at stake.*  
31           *They do not have the resources that adults*  
32           *have. Trauma can scar and shape them*  
33           *adversely for life. They are the ones who*  
34           *need and deserve tender treatment - Compare*  
35           *Genesis ...*

36

37      Is the instruction in that paragraph consistent with your  
38      understanding of how these matters are approached by the  
39      Jehovah's Witness faith?

40      A.    Absolutely.

41

42      Q.    If you go to the next paragraph:

43

44           *Parents must therefore make every*  
45           *reasonable effort to protect their*  
46           *children. Many responsible parents choose*  
47           *to seek out professional help for an abused*

1           *child. Just as you would with a medical*  
2           *doctor, make sure that any such*  
3           *professional will respect your religious*  
4           *views. Help your child rebuild his or her*  
5           *shattered self-esteem through a steady*  
6           *outpouring of parental love.*

7  
8           Is that consistent with your understanding of what the  
9           Jehovah's Witnesses' view is of the role of parents and, in  
10          particular, the role of responsible parents?

11         A.    Yes, it is.

12  
13         Q.    So that a responsible parent would choose to seek out  
14          professional help for an abused child?

15         A.    Yes.

16  
17         Q.    I wonder if I might be able to provide to the witness  
18          a copy of a document that's been provided to my learned  
19          friend. It's an unredacted document. I have copies for  
20          the Commission. Obviously, no names should be mentioned,  
21          Mr Toole, because it's an unredacted document. I'm happy  
22          to provide it to counsel for all parties on the basis they  
23          keep the names confidential.

24  
25               Mr Toole, do you have before you an email?

26         A.    Yes.

27  
28         Q.    It's dated 4 May 2013?

29         A.    Yes.

30  
31         Q.    Was that email solicited by you, or provided to you,  
32          by the author of the email?

33         A.    Provided by the author.

34  
35         Q.    Again, without naming any names, was the email from a  
36          member of the police force?

37         A.    Yes.

38  
39         Q.    Was the person a senior member of the constabulary?

40         A.    Excuse me?

41  
42         Q.    Was the person a senior member of the constabulary?

43         A.    I understood so, yes.

44  
45         Q.    Again, without naming any names, was the email to you  
46          to thank you for the assistance that had been provided by  
47          some elders in relation to the conviction of a person for



1 indecent assault?

2 A. Yes, it was.

3

4 Q. I have no further questions on that document, thank  
5 you.

6

7 THE CHAIR: Do you want it to go into evidence?

8

9 MR TOKLEY: In its redacted form, we'd be happy for it to  
10 go into evidence. In its unredacted form, in order to  
11 preserve the confidentiality of the persons concerned, it  
12 perhaps ought not go into --

13

14 THE CHAIR: The point is, in this instance, the senior  
15 constable expressed her appreciation for what was done. Do  
16 we need any more than that?

17

18 MR TOKLEY: No.

19

20 THE CHAIR: In that case, we might give it back to you so  
21 that there is no chance of there being any breach.

22

23 MR TOKLEY: Thank you, your Honour. I have no further  
24 questions, your Honour.

25

26 MR STEWART: Nothing further, your Honour.

27

28 THE CHAIR: Thank you, that concludes your evidence,  
29 Mr Toole. You are excused.

30

31 <THE WITNESS WITHDREW

32

33 MR STEWART: The next witness is Mr Terrence John O'Brien.  
34 Your Honour, while we're waiting, I renew the call in  
35 relation to the list of names. Perhaps my learned friend  
36 has instructions by now and he can respond to it.

37

38 MR TOKLEY: Your Honour, I'm still taking instructions on  
39 that matter. I will need to speak to the author of the  
40 document, Mr H V Mouritz. I understand he's an elderly  
41 gentleman, in his 90s now, but I want to make sure that the  
42 answer we provide to the Commission is correct and, if need  
43 be, I'll provide an affidavit from Mr Mouritz about that  
44 matter.

45

46 My present understanding is that the service  
47 department did not in fact maintain a list of individuals

1 that could be generated by the computer. Whether that was  
2 Mr Mouritz's understanding at the time is the matter I need  
3 to clarify.

4

5 THE CHAIR: Very well. Mr O'Brien, it's necessary for you  
6 to be sworn. Will you take an oath on the Bible?

7

8 MR O'BRIEN: Yes.

9

10 <TERRENCE JOHN O'BRIEN, sworn: [12.51pm]

11

12 <EXAMINATION BY MR STEWART:

13

14 MR STEWART: Q. Mr O'Brien, will you state your full  
15 name, please?

16 A. Yes, my name is Terrence John O'Brien.

17

18 Q. Mr O'Brien, we have two statements from you, one dated  
19 10 July 2015 and one dated 16 July 2015. Do you have those  
20 to hand?

21 A. Yes.

22

23 Q. Are there any amendments you wish to make to either of  
24 those statements?

25 A. I think I actually had a third statement as well dated  
26 24 July, which was a correction of one point in my first  
27 statement.

28

29 Q. That corrected an aspect in relation to a child abuse  
30 allegation?

31 A. That was the one.

32

33 Q. Taking the second statement to be corrected in that  
34 respect by the third, are there any other corrections you  
35 wish to make?

36 A. No.

37

38 Q. Do you confirm the statements to be true and correct?

39 A. I do.

40

41 MR STEWART: I tender the three statements, your Honour.

42

43 THE CHAIR: They will be exhibit 29-024 as to the first  
44 one, 29-025 and 29-026 for the other two.

45

46 EXHIBIT #29-024 STATEMENT OF TERRENCE JOHN O'BRIEN DATED  
47 10/07/2015

1  
2 EXHIBIT #29-025 STATEMENT OF TERRENCE JOHN O'BRIEN DATED  
3 16/07/2015  
4

5 EXHIBIT #29-026 STATEMENT OF TERRENCE JOHN O'BRIEN DATED  
6 24/07/2015  
7

8 MR STEWART: Q. Mr O'Brien, you are currently the  
9 coordinator of the Australia branch committee of the  
10 Jehovah's Witnesses; is that right?

11 A. The Australia branch, yes.  
12

13 Q. Are you seeking to qualify and say you're not  
14 coordinator of the Australia branch committee?

15 A. Of the Australia branch committee, sorry, yes, that's  
16 correct.  
17

18 Q. You've been a member of the Australia branch committee  
19 since March 2005?

20 A. That's correct.  
21

22 Q. Since when have you been the coordinator of that  
23 branch committee?

24 A. I think for about the last three years. I was acting  
25 coordinator for most of - two of those years when the  
26 coordinator, Mr Mouritz, was overseas, but for the last  
27 almost one year I've been the permanently assigned  
28 coordinator of the branch committee.  
29

30 Q. Prior to that, you've been a Jehovah's Witness since  
31 1975; is that right?

32 A. That's correct.  
33

34 Q. You were baptised in 1976?

35 A. Yes.  
36

37 Q. And you were a ministerial servant in the period 1977  
38 to 1980?

39 A. Correct.  
40

41 Q. And you've been an elder since 1980?

42 A. That's right.  
43

44 Q. In the decade 1987 to 1997 you served as a circuit  
45 overseer in Australia?

46 A. I did, yes.  
47

1 Q. And from 1997 to 2003, you served as a member of the  
2 branch committee of the India branch of the Jehovah's  
3 Witnesses?  
4 A. That's right, yes.  
5  
6 Q. I take it, then, in 2003 or 2004 you returned to  
7 Australia; is that right?  
8 A. Yes, 2003 I returned to Australia.  
9  
10 Q. Dealing first with the Australia branch committee  
11 itself, how many members are there?  
12 A. Presently, we have 12 members.  
13  
14 Q. If I understand correctly, they are all elders - is  
15 that right?  
16 A. All elders, yes.  
17  
18 Q. And that's a requirement, to be a member of the branch  
19 committee one must be an elder?  
20 A. Must be, yes.  
21  
22 Q. It follows, therefore, to be a member of the branch  
23 committee, one must be a man?  
24 A. Correct.  
25  
26 Q. Who are the 12 members, Mr O'Brien?  
27 A. There's myself, of course; then there's Alan Wood;  
28 Graeme Martin; Winston Payne; Vaughn Guy, who is  
29 temporarily overseas on assignment; Donald Maclean;  
30 Viv Mouritz; Douglas King, who is infirmed, not an active  
31 member of the branch committee; Michael Davies; and  
32 Ivan Novion. Is that the 12?  
33  
34 Q. Ten I think we have, Mr O'Brien, including you.  
35 O'Brien, Wood, Martin, Payne, Guy, Maclean, Mouritz, King,  
36 Davies and Nabiyan?  
37 A. Okay, Gregory Frank is an eleventh, and I'll just have  
38 to check who I've missed.  
39  
40 Q. Fair enough. Thank you, Mr O'Brien. Are all those  
41 members serving in that capacity full time?  
42 A. Yes.  
43  
44 Q. So they are in full-time ministry, as it were, in that  
45 capacity?  
46 A. That's correct.  
47

1 Q. And that makes them all members of the Worldwide Order  
2 of Special Full-Time Servants of Jehovah's Witnesses?

3 A. They are.

4

5 Q. So they will all be looked after, as it were, in a  
6 similar way to that explained by Mr --

7 A. Spinks and Mr Toole?

8

9 Q. -- Spinks.

10 A. Yes, exactly the same situation.

11

12 Q. Thank you. They are appointed by the Governing Body;  
13 is that right?

14 A. That's correct.

15

16 Q. Is there a particular length of term of office?

17 A. No.

18

19 Q. So they are appointed until, what, they either retire  
20 or are removed?

21 A. Yes, or expire.

22

23 Q. Or reassigned?

24 A. Yes, that can be the case, too.

25

26 Q. In paragraph 8 of your statement - perhaps we can have  
27 that on the screen - in the second line from the bottom:

28

29 *... the theocratic or Scriptural direction*  
30 *that the Governing Body provides, is the*  
31 *same in every branch and for all of*  
32 *Jehovah's Witnesses, worldwide.*

33

34 Starting with the means by which that direction is  
35 provided, as I understand it, that direction is provided  
36 through the various published manuals and magazines; is  
37 that right?

38 A. Manuals, magazines, letters, can be to congregations.

39

40 Q. I was going to get to that as well. It's also  
41 directives or letters to branches; is that right?

42 A. That's correct.

43

44 Q. Would the Governing Body publish such letters directly  
45 to congregations, or would that be to the branch for the  
46 branch to then publish on to the congregation?

47 A. I can't think of an instance where a letter was

1 directly sent to the congregations, but in the Annual  
2 Yearbook that is released there is a letter in the forward  
3 of that, which is a letter from the Governing Body directly  
4 to every member of the congregation worldwide.

5  
6 Q. What scope is there for branches, such as the  
7 Australia branch, to suggest or request changes, or  
8 participate in any process of change, with regard to the  
9 theocratic or scriptural direction?

10 A. The branch committee doesn't generally get involved in  
11 scriptural interpretation. That's left to the Governing  
12 Body to provide that. The branch committee's general area  
13 of oversight is administering branch matters to do with the  
14 territory in which they oversee, field ministry,  
15 conventions, things such as that.

16  
17 Q. The reason for not being involved in scriptural  
18 interpretation, is that because the Governing Body is seen  
19 as being Jehovah's representatives on earth who give the  
20 scriptural interpretation - the definitive scriptural  
21 interpretation?

22 A. Yes. My understanding is the Governing Body will  
23 approve the information, but they have other what they  
24 refer to as helpers and various committees who assist them  
25 in researching and formulating some of the suggestions.  
26 That would then go to the Governing Body for approval or  
27 adjustment, depending.

28  
29 Q. So, as I understand it, there would be no scope for a  
30 branch - an Australia branch - to adopt a different  
31 scriptural interpretation from that of the Governing Body?

32 A. I'm not aware of it happening.

33  
34 MR STEWART: Would this be an appropriate time?

35  
36 THE CHAIR: Yes, we'll take the luncheon adjournment.

37  
38 **LUNCHEON ADJOURNMENT**

39  
40 MR STEWART: As your Honour pleases.

41  
42 Q. Mr O'Brien, I would like to show you a document  
43 entitled "Branch organisation", January 2015. It was  
44 published in 2012 by the Watchtower Bible & Tract Society  
45 of Pennsylvania. Would I be right to understand that this  
46 is the current version of this manual?

47 A. Yes, January 2015, the date?

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Q. Yes.

A. Yes.

Q. And this is the document that was produced in answer to my call earlier today?

A. That's correct.

Q. As coordinator of the Australia branch, I take it that you are reasonably familiar with this manual?

A. Yes.

Q. I would like to take you to some parts of it and then ask you some questions that follow. Starting with chapter 1 - do you have chapter 1 headed "Governing Body and Governing Body Committees"?

THE CHAIR: Do you have another copy of this document? We only have one between us.

(Document handed to his Honour)

MR STEWART: Q. In paragraph 1 it provides:

*The Governing Body of Jehovah's Witnesses is made up of brothers who are anointed servants of Jehovah God. They have the responsibility for giving direction and impetus to the Kingdom work.*

Some scriptures are cited. Then it says:

*Like its first-century counterpart, the Governing Body today looks to Jehovah, the Universal Sovereign, and to Jesus Christ the Head of the congregation, for direction in all matters.*

That's what it says. Is that the practice? Is that how it works?

A. That's correct.

Q. Then you will see in paragraph 2:

*The Bible says: "Let all things take place decently and by arrangement." ... The Governing Body obeys the direction by*

1           *putting in place various helpful procedures*  
2           *and guidelines that ensure the smooth and*  
3           *orderly operation of the branch offices and*  
4           *the congregations. Responsible Christian*  
5           *men do their part by setting an example of*  
6           *obedience as they put such arrangements*  
7           *into effect.*

8  
9           And, in your experience, is that how it has worked, in  
10          practice?

11         A.    Yes.

12  
13         Q.    In paragraph 4:

14  
15               *The Governing Body gives final approval for*  
16               *new publications as well as new audio and*  
17               *video programs.*

18  
19         Is that right?

20         A.    That's correct.

21  
22         Q.    Is the consequence of that that the branch office does  
23         not, itself, publish anything independently of the  
24         Governing Body?

25         A.    No, but we do have writing desks - for example, the  
26         Australia branch, we have a writing desk; we have writers  
27         who prepare articles and submit those, and they get  
28         published in The Watchtower, Awake! magazines.

29  
30         Q.    That's a process that is actually explained in a later  
31         chapter, so far as I was able to see, whereby people within  
32         the branch would submit articles to the headquarters in  
33         New York and those articles may be accepted for  
34         publication?

35         A.    And get approved by the Governing Body for  
36         publication, yes.

37  
38         Q.    So is it the case, then, the Governing Body, as  
39         a body, would approve each of the publications published by  
40         the Watchtower Bible & Tract Society of Pennsylvania?

41         A.    Yes.

42  
43         Q.    So each Awake! article and each Watchtower article, we  
44         can take, as having been approved by the Governing Body?

45         A.    The Governing Body, as I understand, read every  
46         article before it's published and then give their approval  
47         for that.



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Q. Then in paragraph 5 it says:

*The Governing Body cares for the appointment and deletion of Branch and Country committee members and designates the brother who will serve as the coordinator of the committee.*

That is how it happens in practice, is it?

A. That's correct.

Q. So you were designated as coordinator under this provision?

A. That's right.

Q.

*It also appoints circuit overseers and country representatives. In most cases, such appointments are made based on recommendations received from the Branch Committee. The Governing Body also appoints helpers to Governing Body committees as well as headquarters representatives qualified to make branch visits.*

I take it that is what is done in practice?

A. Yes.

Q. Over the page, as we see in paragraph 8, the various committees of the Governing Body are identified, starting with the coordinators' committee - do you see that?

A. Yes.

Q. In paragraph 8:

*This committee oversees legal matters and the use of the media when necessary to convey an accurate picture of our beliefs. It responds to disasters, outbreaks of persecution, and other emergencies ...*

and so on. I take it that the coordinators' committee does actually exist and function, does it?

A. Yes.

1 Q. On the following page, do you see at paragraph 15  
2 there is something called the teaching committee?

3 A. Paragraph 15? Yes.

4  
5 Q. And it says:

6  
7 *This committee supervises the production of*  
8 *spiritual food that is delivered orally for*  
9 *the benefit of the worldwide brotherhood*  
10 *and supervises the format that is to be*  
11 *followed at congregation meetings.*  
12

13 Am I to understanding that correctly, that the teaching  
14 committee is responsible for what is taught orally around  
15 the world?

16 A. Yes, at the congregation meetings, conventions,  
17 assemblies.

18  
19 Q. So it says:

20  
21 *For example, it is directly involved in*  
22 *preparing talk outlines, convention costume*  
23 *dramas and sound-only drama scripts and*  
24 *recordings, convention chairman's*  
25 *introductions, as well as audio and video*  
26 *publications that are distributed on DVD,*  
27 *posted on jw.org, or broadcast through*  
28 *other means.*  
29

30 And so on. That's all the responsibility of the teaching  
31 committee?

32 A. That's correct.

33  
34 Q. Then it sets out schematically, I think two pages  
35 further on, under the heading "World Headquarters", the  
36 Governing Body and then the various committees of the  
37 Governing Body are identified. Amongst them are the  
38 coordinators' committee on the left, the writing committee  
39 on the right, and the teaching committee next to that. As  
40 far as you know, is that how it is actually structured?

41 A. Yes, that's how it operates.

42  
43 Q. Chapter 2 deals with the responsibility of branch  
44 committee members. In paragraph 1 it says:

45  
46 *The Governing Body appoints well-qualified*  
47 *elders to serve as members of a Branch*

1                   *Committee.*

2

3           I think you gave evidence to that effect earlier in any  
4           event, so that happens in practice, does it?

5           A.    That's - yes, that's correct.

6

7           Q.    And skipping one sentence it says:

8

9                   *As the representatives of the Governing.*  
10                  *Body in their assigned territory, Branch*  
11                  *Committee members must faithfully implement*  
12                  *and follow the direction coming from God's*  
13                  *Word and "the faithful and discreet slave."*

14

15           Firstly, to understand the reference to the "faithful and  
16           discreet slave", that's a reference to the Governing Body,  
17           am I right?

18           A.    That's synonymous, yes.

19

20           Q.    So are we to understand that the branch committee  
21           members must faithfully implement and follow the direction  
22           given by the Governing Body?

23           A.    Yes.

24

25           Q.    And in paragraph 3 you will see:

26

27                   *Each Branch Committee member should be able*  
28                  *to give as well as to follow direction. He*  
29                  *must keep up-to-date with the policies and*  
30                  *direction from the Governing Body and help*  
31                  *others in oversight at the branch office to*  
32                  *do likewise.*

33

34           I take it that, at your branch office, you try to do that?

35           A.    We do, yes.

36

37           Q.    And in paragraph 4:

38

39                   *Branch Committees also have the*  
40                  *responsibility to keep the organisation*  
41                  *clean.*

42

43           And there is a scriptural reference:

44

45                   *They must be courageous in seeing to it*  
46                  *that all unrepentant ones are removed from*  
47                  *the congregation.*

1  
2 I take it you seek to fulfil that requirement, do you?  
3 A. Yes, the branch committee doesn't actually do that,  
4 unless they are an elder in a particular congregation that  
5 would handle - be on a judicial committee. But they are  
6 responsible to ensure the procedures are in place in  
7 congregations - qualified elders to carry out that.  
8  
9 Q. And they do that by their - that is, the branch  
10 committee's - oversight of the congregations.  
11 A. Yes.  
12  
13 Q. If we then skip a page and we go to paragraph 16, we  
14 will see:  
15  
16 *Branch Committee Coordinator.*  
17  
18 That's the position you hold; is that right?  
19 A. That's correct.  
20  
21 Q. Some aspects are set out in relation to that. Could  
22 I then take you to the coordinators' committee, which is at  
23 chapter 3. The pages themselves are not numbered, so far  
24 as I can see.  
25 A. Yes.  
26  
27 Q. This is dealing with the coordinators' committee of  
28 the branch committee - do I understand that correctly?  
29 A. No. No, this is --  
30  
31 Q. I beg your pardon, I meant of the Governing Body.  
32 A. The Governing Body.  
33  
34 Q. The coordinators' committee of the Governing Body?  
35 A. That's correct, yes.  
36  
37 Q. Thank you. Paragraph 1 is introductory. In  
38 paragraph 2 it sets out the branch committee's roles  
39 saying:  
40  
41 *[It] should feel free to ask the Governing*  
42 *Body or one of its committees any question*  
43 *relating to the Kingdom work in the*  
44 *territory under the oversight of the branch*  
45 *office. It is best that such questions be*  
46 *expressed clearly and carefully in writing*  
47 *rather than by telephone.*

1  
2 So do I understand from that that if the branch committee  
3 has questions with regard to any policy or procedure or  
4 scriptural interpretation, it has the ability to write and  
5 seek clarification?  
6 A. That's correct, yes.  
7  
8 Q. Is that procedure utilised in practice?  
9 A. Yes.  
10  
11 Q. I won't go to the details, but in paragraph 5 there is  
12 set out what desk symbols should be used. Mr Spinks gave  
13 some evidence with regard to that. Paragraph 6 is  
14 correspondence standards. Then we go over, through naming  
15 of files, and even in paragraph 14, in particular, I might  
16 identify:  
17  
18 *In addition to the use of numbered letters*  
19 *and memorandums, departments at*  
20 *headquarters and at the branch offices --*  
21  
22 A. Sorry, I just missed where you are.  
23  
24 Q. Paragraph 14, do you see, headed "E-Mail"?  
25 A. Yes.  
26  
27 Q. I am drawing attention to where it says that:  
28  
29 *... departments at headquarters and at the*  
30 *branch offices may be approved by oversight*  
31 *to use e-mail to communicate directly with*  
32 *departments or individuals in other lands*  
33 *about technical and routine matters.*  
34 *However, e-mail does not replace numbered*  
35 *letters or memorandums.*  
36  
37 So am I to understand that. In practice, certain people  
38 are approved to use emails for these kinds of  
39 communications?  
40 A. Yes, as it mentions, routine matters - for example,  
41 our computer department assists other branches that don't  
42 have qualified personnel, so rather than use branch mail,  
43 they can communicate just by email, because it is a routine  
44 matter.  
45  
46 Q. So to summarise, then, is it the case that this manual  
47 sets out the rules by which the Jehovah's Witness

1 organisation internationally operates?

2 A. Yes, from the Governing Body and the branch - it's  
3 branch organisation, so it is direction for branch  
4 committees.

5

6 Q. And right down to the details of who may communicate  
7 with whom and in what medium?

8 A. Yes, in fairly broad parameters, though. The branch  
9 committee has the responsibility to decide who may. But  
10 the majority of the office workers use email to correspond.

11

12 Q. So when the Governing Body gives the directive to the  
13 branch to deal with something in a particular way, this is  
14 the document which sets out the Governing Body's authority  
15 to do that, and the branch's obligation to obey; is that  
16 right?

17 A. Yes, in conjunction with the scriptures, but the  
18 scripture reference that was used twice there in  
19 Matthew 24:45-47 says that Jesus appointed the faithful and  
20 discreet slave to provide the spiritual food to the  
21 domestics - that's God's people. So on the basis of that  
22 scripture, that's the scriptural reference for the whole  
23 procedure here.

24

25 Q. Broadly, it is believed to be modelled on  
26 First-Century Christendom, as set out in Acts?

27 A. Acts chapter 15, as an example. So there, there was  
28 a question on doctrine and rather than the apostle Paul  
29 making a decision on whether circumcision was a requirement  
30 for Christians, which was the issue, he took that back to  
31 the Governing Body of older men, the apostles, and other  
32 older men in Jerusalem. They made the decision and then  
33 they sent that decision by letter back with travelling  
34 representatives to the congregations, letting them know  
35 what the decision of the Governing Body was.

36

37 THE CHAIR: Q. Mr O'Brien, I have discussed this with  
38 other witnesses, but the Bible was, of course, written by  
39 people who lived a long time ago.

40 A. Yes.

41

42 Q. And who lived in a particular political and social  
43 structure.

44 A. True, yes.

45

46 Q. For example, slavery was still part of everyday life?

47 A. That's correct, yes.

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Q. And taking that as an instance, society generally - not everywhere, but society generally, and certainly in western society, has moved on where slavery is no longer permitted?

A. True.

Q. That's an illustration of social change.

A. Yes.

Q. Now, the learnings that you take from the Bible and then translate into obligations, as I presently understand it, in many instances are learnings that were created in order to benefit and create a stable and healthy society more than 2,000 years ago?

A. Correct, yes.

Q. Is it open to the Jehovah's Witnesses to take another look and ask the question whether what the Bible says was appropriate for those times remains the obligation of the 21st century?

A. So that's the issue - with the Hebrew scriptures or the Old Testament, and the Greek scriptures or the New Testament, that was a significant change in Bible law and Bible understanding, and much of the Christian era recorded in the Greek scriptures or the New Testament, basically is principles rather than laws and commandments, although it does still contain some laws. But the Mosaic law that the nation of Israel had lived by, that was done away with Christ, and so the principles - we believe many of them are timeless, in any place, any time.

Q. That's the question: that's your belief.

A. Yes.

Q. And I was careful to say "there are principles which you have accepted as obligations". And that's the position, isn't it?

A. Yes, that can be - yes.

Q. But is it open to Jehovah's Witnesses, as perhaps you have done with slavery - I mean, I assume that Jehovah's Witnesses would find slavery abhorrent.

A. Yes, yes, particularly the --

Q. Whereas the New Testament accepts it?

A. It was a different type of slavery to what generally

1 is - like the African slavery that was taking place in  
2 those centuries, the settlement of the empires - the  
3 slavery back then was much more like an employed person.  
4

5 Q. Not the impression I have of Rome.

6 A. Well, yes, the Christian era, in the household of  
7 Christians, it was that way. The Bible gives counsel to  
8 masters who had slaves, how they were to treat their  
9 slaves - not the way the Romans did.  
10

11 Q. They weren't exactly employees, though, were they?

12 A. No, but they were cared for. The point I'm making is  
13 it was different to the type of slavery people associate  
14 with, say, the African-Americans.  
15

16 Q. At the centre of the issues that the Commission is  
17 concerned with, of course, as you know, is the process  
18 whereby the Jehovah's Witnesses receive, investigate and  
19 determine allegations of sexual abuse.

20 A. Right.  
21

22 Q. You understand that?

23 A. Yes, I do, yes.  
24

25 Q. And you understand the discussion we have had about  
26 the difficulties that women might face in expressing their  
27 intimate concerns to three men in the tribunals that you  
28 have provided?

29 A. I do, and that's why I think Mr Spinks made the point  
30 yesterday that that just doesn't happen, nowadays, that -  
31 unless the woman wanted to face her accuser *[sic]*.  
32

33 Q. It's not the accuser *[sic]*. We're talking about the  
34 adjudicator.

35 A. Yes. So if it's a matter of gathering evidence, the  
36 principle is that the elders who are going to investigate  
37 the matter simply need to be convinced that the statement -  
38 receive the statement from the victim. That can be done  
39 any number of ways. She doesn't have to sit and face three  
40 elders, because there is no clear Bible principle that says  
41 that she must do that. So --  
42

43 Q. But, nevertheless, she is disclosing her intimate  
44 details to three men.

45 A. Well, not necessarily, I think, your Honour. She can  
46 meet one elder, depending on the age of the person. It's  
47 historical --



1  
2 Q. All right. Ultimately, the adjudication process will  
3 require three men?  
4 A. Three men. But she may not need to be involved after  
5 she has provided her statement.  
6  
7 Q. After she has given the intimate details?  
8 A. Yes.  
9  
10 Q. Correct? Now, is there room for women to be involved  
11 in the investigation and decision-making process?  
12 A. Well, that's one of the points we need to take back  
13 and discuss, give that much more consideration than we  
14 have, because that - if it's based upon the Bible  
15 standards, then we would present that to the Governing Body  
16 as one of the recommendations from the Commission. We  
17 certainly - I can see the point being made with it, and  
18 I don't see why a woman couldn't be involved in the  
19 process, particularly in establishing the victim's  
20 statement, so she doesn't have to face three men.  
21  
22 Q. Now, as I understand it, the role of a woman in early  
23 Christian society was quite different to the role which  
24 women have in western society today?  
25 A. Yes.  
26  
27 Q. Is that correct?  
28 A. Yes, I'd say that's true.  
29  
30 Q. And the Bible, in identifying men as the leaders - and  
31 thus you have turned that into the elders - was reflecting  
32 the social structure that existed in those communities in  
33 those days, wasn't it?  
34 A. It was.  
35  
36 Q. Society has changed in the western world, and  
37 continues to change, in relation to the role of women,  
38 doesn't it?  
39 A. Yes, very much so.  
40  
41 Q. Now, why would it be that the Jehovah's Witnesses  
42 would stay with a structure that is reflected in a society  
43 of 2,000 years ago, and not one that is a contemporary  
44 society today?  
45 A. I think the fundamental issue, your Honour, is whether  
46 or not we accept the Bible as being the word of God, and  
47 God, as the sovereign, has the right to decide on those

1 matters. So that is how we view the Bible. But we realise  
2 that society in general doesn't have that view.

3  
4 Q. No, but you have moved away from a number of the  
5 precepts of early Christian society - we have discussed  
6 slavery, but I think yesterday I discussed with one of your  
7 colleagues the role of women in the church itself and their  
8 capacity to speak, and so on. You probably heard that  
9 exchange?

10 A. Yes, I heard the discussion, yes.

11  
12 Q. I mean, a number of things have been put to one side  
13 or have been changed.

14 A. Yes. So if a review of our process - which we will  
15 take back - I will take that definitely back to our branch  
16 committee and our service department personnel to just have  
17 another good look at the procedures, and if we can see  
18 a need to make some adjustments in that, that's what we  
19 would recommend to the Governing Body. There's no question  
20 on that.

21  
22 Q. So that is it right to understand that if the evidence  
23 from this Commission and the gathered expertise of  
24 professional people suggests that your process, by not  
25 involving women at the decision-making level, was a flawed  
26 process - would it be open to change?

27 A. I definitely think it is open to change. It always  
28 is. We've been reviewing the process for years, decades.

29  
30 Q. I'm specifically asking about the decision. Would it  
31 be open to change the composition of the decision-making  
32 body?

33 A. Of the judicial committee?

34  
35 Q. Yes.

36 A. I can't see how it could, personally, but then I'm not  
37 the decision-maker on that. That would be the Governing  
38 Body. But scripturally --

39  
40 Q. But some things can change, for example, the role of  
41 women in the church and their capacity to speak, but  
42 whether or not women are decision-makers can't change; is  
43 that the idea?

44 A. As I understand it.

45  
46 Q. Now, why is that?

47 A. Because the scriptures are very clear, that an

1 overseer or an elder has to be a man. There's no provision  
2 in the scriptures for a woman to be an overseer. It is the  
3 elders who are the shepherds and would judge in these  
4 matters. I think that's dealing now at the situation of  
5 the judicial process with the wrongdoer, not with the  
6 victim. The earlier processes that we've been talking  
7 about and listening to - I think there is certainly scope  
8 there for women to be involved in those steps.

9  
10 Q. What you are looking at is a determination of whether  
11 or not the allegation is true.

12 A. That's correct.

13  
14 Q. All that I'm asking is, leaving aside whatever might  
15 be the other role of men in the church - I don't go there -  
16 but why is it not open to say, now, given that you, as  
17 Jehovah's Witnesses, have created this process with its  
18 investigation and determination steps - why is it not open  
19 to change that process to include women in the  
20 decision-making component?

21 A. Well, it's probably a question that I'm not authorised  
22 to really give you a definite answer on. But it is  
23 certainly one that I will be taking back to our branch  
24 committee and passing on to the Governing Body, because  
25 I can see the reasoning behind the suggestion, the  
26 recommendation.

27  
28 Q. I assume you would accept that women bring a different  
29 perspective and a different understanding to an issue such  
30 as whether or not a young girl or a woman was sexually  
31 assaulted than a man might bring?

32 A. Most definitely. That's - women have the motherly  
33 instincts that a man just can't have.

34  
35 Q. And what your process does at the moment is exclude  
36 them from the decision-making component altogether, doesn't  
37 it?

38 A. So when you refer to the decision-making, excuse me --

39  
40 Q. The determination of whether or not the allegation is  
41 true?

42 A. No, women could be involved in that step. So that's  
43 the point I was trying to make --

44  
45 Q. As decision-makers?

46 A. To - well, she's listening to the comments - for  
47 example, a mother listens to her daughter.

1  
2 Q. No, no, no. We're talking about the processes which  
3 you have for determination, and ultimately judicial  
4 determination, of the truth of the allegation. Those  
5 processes, at the moment, exclude men [sic] - we've agreed  
6 on that.  
7 A. Exclude women.  
8  
9 Q. Exclude women.  
10 A. I don't think it's so entirely, because women can be  
11 involved in the - that's talking about the investigation  
12 process.  
13  
14 Q. No, I'm talking about the decision-making process.  
15 A. Whether or not it is --  
16  
17 Q. Whether or not it is true.  
18 A. Yes. So I don't see --  
19  
20 Q. Women are presently excluded from that decision, are  
21 they not?  
22 A. No, they could be involved in the discussions with the  
23 elders who have been investigating it. Like there are many  
24 situations where women have perhaps been involved in  
25 talking to the victim or maybe the victim is only  
26 comfortable to talk to a woman. She is sharing her  
27 observations with the elders. But there is nothing wrong  
28 with that. Nothing --  
29  
30 Q. Well, I think I have exhausted my capacity to get to  
31 the real issue, but the real issue is whether the church's  
32 processes will allow for women to participate in the actual  
33 decision. Do you understand? That's the question.  
34 A. In the decision of whether it needs to be a judicial  
35 matter or not, establishing guilt.  
36  
37 Q. The truth of the allegation.  
38 A. Mmm, yes.  
39  
40 MR STEWART: Q. Perhaps it can be put like this, leaving  
41 the word "involved" out of it. On the present structure,  
42 a woman cannot be a decision-maker on whether or not the  
43 allegation is found to be sufficiently proved?  
44 A. She wouldn't be one of the two elders investigating, I  
45 could narrow it down to that.  
46  
47 Q. So she cannot be the decision-maker. And, equally, on

1 the judicial committee, a woman cannot be a decision-maker?  
2 A woman might be involved giving evidence --  
3 A. Right.

4  
5 Q. -- or whatever, but can't be a decision-maker.  
6 A. No.

7  
8 Q. The question, then, is do you see scope for that  
9 changing, as to who the decision-makers are, and having  
10 a woman being a decision-maker?

11 A. I certainly see scope in presenting that as an option  
12 to be explored more deeply than perhaps it has been up  
13 until now, yes, definitely.

14  
15 Q. Mr O'Brien, you have followed these proceedings  
16 closely over the last week and a half, I take it?  
17 A. Yes, I have.

18  
19 Q. I sought to have a message conveyed to you yesterday  
20 evening - I hope you got it - and that is as to whether,  
21 having listened to it all, you have identified aspects of  
22 your process which seem, to you, to require re-examination  
23 and change.

24 A. Yes, I think a number of areas have come up for  
25 consideration that we need to now go back and look at much  
26 more carefully. One of them is the matter of some clearer  
27 documentation for the ones who will be involved in handling  
28 investigations and judicial cases - involving child sexual  
29 abuse, I'm talking about, maybe specific information just  
30 tailored to that, so that the elders would be - have much  
31 more at their fingertips in one package, the information  
32 they need. That's certainly one observation I will be  
33 taking back.

34  
35 A second consideration would be that in the initial  
36 meetings with the victim, or the parents of the victim if  
37 it is a minor, that it's very clearly explained to them  
38 what the options are for them and what the implications are  
39 for either option, knowing that they will have the full  
40 support of the elders whatever is their decision.

41  
42 Q. By "options", you are referring to the possibility of  
43 reporting to the authorities?

44 A. Reporting to the authorities or, if they wanted it  
45 handled just within the church itself, leaving them make  
46 the decision.

47

1 Q. Yes.

2 A. So those are two factors that stand out significantly  
3 to me that we need to - and probably, then, in the process,  
4 the various steps that are taken from the initial  
5 discussion with the victim, or the victim's parents in the  
6 case of a minor, each step of the way ensuring that the  
7 victim or the parents understand what the next step is  
8 going to be, so there is complete clarity in the mind of  
9 those, what the process is all about. Because I think that  
10 is a weakness that has been identified that needs  
11 clarification.  
12

13 Q. Anything further you have identified?

14 A. I think they are probably the three major things.  
15 I do take on board the point of more involvement with women  
16 in the process, if that can be accommodated. I'm not in a  
17 position, really, to state whether that would be or would  
18 not be, but I can certainly take that as a matter on the  
19 agenda for consideration.  
20

21 Q. You would have heard quite a bit about the question of  
22 the sufficiency of evidence, in other words, what has been  
23 referred to as the two-witness rule. Firstly, from what  
24 you have heard and the way in which it operates, do you  
25 consider it to be justified?

26 A. Yes, again, because we accept that scriptural  
27 direction that did come from Christ himself, that we don't  
28 see we have authority to go outside of that. But that's in  
29 establishing whether or not there will be a judicial  
30 committee to follow. It doesn't mean that we don't believe  
31 the victim or that we wouldn't take certain precautions and  
32 action where we can, but it just means that we don't have  
33 a basis to form a judicial committee at that point.  
34

35 Q. Insofar as the judicial committee itself is concerned,  
36 so not dealing with the step before that, what about on the  
37 question of whether the victim herself must give evidence,  
38 in circumstances where there is no confession and no other  
39 witness, or no second other witness?

40 A. That she must give evidence? Sorry, maybe I just  
41 didn't quite understand the point of the question.  
42

43 Q. My understanding of where things landed with Mr Spinks  
44 yesterday was that when it comes to the judicial committee  
45 hearing itself, unless there is a confession or two other  
46 independent witnesses, it will be necessary for the victim  
47 herself to give evidence.

1 A. No, she would have been able to do that in the written  
2 statement. She wouldn't need to appear before the judicial  
3 committee, or before the accused.

4  
5 Q. What about the requirement that the victim must face  
6 her attacker?

7 A. No.

8  
9 Q. Or, as it is put differently, that the accused has  
10 a right to be faced by his accuser?

11 A. I think the information that has been presented from  
12 the Shepherding book indicates that that is not necessarily  
13 the case. Not even limiting it to child abuse, even if the  
14 victim is timid, they may not feel capable to face the  
15 accused. If that's the case, the elders would quite  
16 happily accept a written statement.

17  
18 Q. We will go back to what Mr Spinks said himself, and  
19 the documents that he referred to, which were tendered as  
20 exhibit 29-020, but do I understand from you that you  
21 accept that an appropriate process would not require the  
22 victim to give evidence in the face of her attacker or her  
23 alleged attacker?

24 A. Definitely not. If she felt she was not able to do  
25 that, that wouldn't be a requirement. In fact, she would  
26 only be required to do it if she wanted to.

27  
28 Q. And with regard to the possible outcomes of a judicial  
29 committee hearing, reproof, of course, leaves a known  
30 offender in the congregation and in the family, if the  
31 offender is in a family - not so?

32 A. Yes.

33  
34 Q. And disfellowshipping leaves a known offender in the  
35 family and/or at large in the community?

36 A. That's true.

37  
38 Q. Both those problems can only be resolved with  
39 systematic reporting to the authorities; would you agree?

40 A. Yes, I - well, that's true. But it doesn't  
41 necessarily remove the person, as I understand, from the  
42 community. If they were imprisoned, it would, but once  
43 they are released, you still face the same dilemma that we  
44 do, that the person is free in the community.

45  
46 Q. You may be aware, Mr O'Brien, that in New South Wales,  
47 at least, there is legislation that deals with that

1 question of serious sex offenders coming to the end of  
2 their terms in gaol and as to assessments then being made  
3 as to whether they should be released. And there is  
4 a complicated process involving many professionals and  
5 reports and so on. Are you aware of that?

6 A. Yes. The challenge that I see with the process for  
7 ourselves as a religious organisation, and also with the  
8 judiciary, is that there is a wide range of acts that  
9 constitute child abuse - like, to us, an adult sexting with  
10 a minor, we would regard that as child abuse and they would  
11 be dealt with judicially.

12  
13 Q. So would the law.

14 A. Right. But would they receive the same type of  
15 penalty as, say, somebody who raped a child? That's what  
16 I'm just saying.

17  
18 Q. Obviously not, or presumably not, but that would be up  
19 to the particular court.

20 A. Certainly.

21  
22 Q. But our point is this, Mr O'Brien: you, as the  
23 Jehovah's Witness organisation, don't have the power to  
24 intervene in a family in such a way as to ensure protection  
25 of children; you can give advice and counsel, but you can't  
26 really do more than that, can you?

27 A. No; that's correct, yes, we can't take --

28  
29 Q. Whereas child protection authorities, in certain  
30 circumstances, can?

31 A. Yes.

32  
33 Q. So would you at least accept this: it warrants  
34 further consideration by the Jehovah's Witness organisation  
35 as to whether they should systematically report child  
36 sexual abuse allegations?

37 A. I understand, listening to Mr Toole and Mr Spinks,  
38 that we have no hesitation in doing that, if that's what is  
39 required by the law. But we don't see that we have the  
40 right to take that prerogative away from the victim or the  
41 parents of the victim, if they chose not to.

42  
43 Q. And that's because of a scriptural principle?

44 A. Yes, that's right.

45  
46 Q. With regard to redress, by which I mean responding to  
47 and potentially compensating victims of child sexual abuse



1 within the organisation, I understand that in Australia,  
2 the Jehovah's Witness organisation doesn't have a redress  
3 scheme?

4 A. No, and that's because we've never had a request, so  
5 far, for redress, so we haven't --  
6

7 Q. Well, you recognise that maybe there has been no  
8 request for redress because no scheme has been available?

9 A. I couldn't say why victims haven't requested that.

10

11 Q. I'm suggesting that it may not be a good reason to not  
12 have a scheme, because there have been no claims; it may be  
13 that a scheme will be the very thing that gives comfort to  
14 a lot of people that their allegations are taken seriously  
15 and that they actually get compensated?

16 A. Yes, certainly.

17

18 Q. Is that not something that the Jehovah's Witness  
19 organisation should consider, having a redress scheme?

20 A. Yes, I agree with that.

21

22 Q. Because if we consider [BCB]'s case as an example --  
23

24

25 THE CHAIR: Q. Just a second. You know that the  
26 Commission's been looking at the issue of redress,  
27 I assume?

28 A. I do, yes.

29

30 Q. And it is fairly clear that the Commission will be  
31 recommending a response which brings together all of the  
32 institutions where there may have been problems, to  
33 contribute their fair share - you understand that?

34 A. I recall that from the closed hearing we had with  
35 yourself.

36

37 Q. Are Jehovah's Witnesses prepared to contribute to such  
38 a scheme?

39 A. I'm not in a position to personally give that  
40 undertaking, your Honour, but certainly --  
41

42

43 Q. Who is?

44 A. -- we can present that and discuss that.

45

46 Q. Who is?

47 A. That would be a decision - if it is the Watchtower  
Bible & Tract Society, then that would be a decision for  
the 26 members. I don't have executive powers over the

1 committee or the members. But I can certainly present  
2 that, because I can see that that is a need that needs to  
3 be considered.  
4

5 Q. Would you recommend that the church join in such  
6 a scheme?

7 A. I don't know whether I would recommend that the church  
8 join in with other organisations, but certainly that we  
9 have some redress scheme of our own to care for victims who  
10 are Jehovah's Witnesses. I would agree with that.  
11

12 Q. Why wouldn't you recommend that you join with others  
13 so that there is a uniform response across the country?

14 A. If I may just indulge, your Honour, when we had the  
15 closed meeting with yourself and others, that was a matter  
16 that I think it was almost universally felt as a last  
17 option by those who were assembled, for a variety of  
18 reasons. I think some may feel that - would it be fair on  
19 smaller organisations and unfair on the - or, rather,  
20 unfair on smaller ones, fairer on the larger ones? To  
21 manage it I would see it as a much greater difficulty than  
22 for the individual organisation to provide their own  
23 scheme.  
24

25 Q. You must have a different recollection to me. But the  
26 theory would be that there be an organisation constituted  
27 to administer the scheme, and then each organisation  
28 contributes in accordance with its identified number and  
29 extent of survivor needs. You understand?

30 A. Yes, I understand the principle you mentioned.  
31

32 Q. And why wouldn't you join in that?

33 A. Well, again, I can't say that we would or wouldn't,  
34 but --  
35

36 Q. Sorry, why wouldn't you recommend that you join --

37 A. Yes, well, I'd have to give it good consideration to  
38 recommend it. But I wouldn't rule out that we wouldn't  
39 consider that or that I wouldn't recommend that. But we  
40 would have to see what the parameters were, what the - say,  
41 the considerations were for the organisation.  
42

43 Q. The matter has been now talked about for months. Has  
44 your organisation considered it in any structured way?

45 A. No.  
46

47 Q. We have had discussion papers, we've had roundtables.

1 A. No --

2

3 Q. We've had public hearings.

4 A. Yes, the roundtable discussion, I came away from that  
5 without any real conclusions. I felt - maybe I didn't get  
6 the right, what do you say, message from it, but I didn't  
7 feel that it was a universally agreed-to option. I haven't  
8 read or heard any more about it since, to be honest.

9

10 MR STEWART: Q. On the question of joining any form of  
11 scheme and a decision in relation to that, you said that  
12 would be a decision of the Watchtower Bible & Tract Society  
13 and the 21 members. Why would that be so? Why not the  
14 Jehovah's Witness organisation itself, separate from one of  
15 the corporations that it uses?

16 A. Well, the challenge would be if it's an unincorporated  
17 group, an association of people, providing the funding  
18 I would see as a major difficulty for victims who have  
19 a just and fair claim.

20

21 Q. Just dealing with the decision making on it, the  
22 decision would have to be made by the Governing Body,  
23 wouldn't it?

24 A. As far as providing redress?

25

26 Q. Yes, well, as far as having a redress scheme or  
27 insofar as joining some other scheme along the lines that  
28 his Honour was engaging you about, with other  
29 organisations?

30 A. Yes, it would have to be presented to the Governing  
31 Body for approval, but we would have to provide the scheme  
32 for victims in - within Australia. The Governing Body  
33 wouldn't be taking that into their consideration.

34

35 Q. Because the corporation you are referring to is the  
36 Australian corporation?

37 A. The Watchtower Bible & Tract Society of Australia.

38

39 Q. And that is an instrument of the Jehovah's Witness  
40 organisation itself - not so?

41 A. It is, and it's the one that can legally handle  
42 financial matters, whereas Jehovah's Witnesses themselves  
43 or the branch committee --

44

45 Q. And you as the church organisation use that  
46 corporation to your ends - not so?

47 A. Yes, for a variety of reasons.

1  
2 Q. And so it must do what you say it must do?  
3 A. Sorry, I just missed that?  
4  
5 Q. So it must do what you say it must do - not you  
6 personally but the organisation?  
7 A. Yes, what the members approve. It's true. It still  
8 is a legal organisation, it has to have membership  
9 approval.  
10  
11 Q. But you couldn't conceive of a situation of the  
12 members of the organisation doing something other than what  
13 the branch committee was happy for them to do?  
14 A. That's true, and I think it's because the branch  
15 committee wouldn't recommend something that we didn't feel  
16 was proper.  
17  
18 Q. So it is a bit artificial, isn't it, to say it is up  
19 to the 21 members of the corporation, when the corporation  
20 is actually, and factually, under the control of the branch  
21 committee?  
22 A. No, I don't think so, because the branch committee, as  
23 I mentioned before, is 12 people, who would have to discuss  
24 this and provide that, then, and they - most of the branch  
25 committee are members of the Watchtower Bible & Tract  
26 Society in any case.  
27  
28 Q. That probably illustrates the point. But moving on,  
29 Mr O'Brien, Mr Geoffrey Jackson, who is a member of the  
30 Governing Body, as I understand - he heads the teaching  
31 committee; is that right?  
32 A. He's a member of two committees. My understanding is  
33 that each of the Governing Body members are members of two  
34 committees. I understand he is a member of the writing  
35 committee and the teaching committee.  
36  
37 Q. I have to say, my information, as at September 2014,  
38 also puts him as a member of the personnel committee.  
39 A. Well, that's different to my understanding.  
40  
41 Q. We will leave personnel out of it for a moment. So -  
42 but Mr Jackson is - I'm not sure what the designation is,  
43 whether it is coordinator or chair or responsible for, but  
44 he is, in effect, the head or responsible for the teaching  
45 committee, isn't he?  
46 A. No, I don't think - the chairman is simply, like - the  
47 similar role of being a coordinator of the branch

1 committee, is that he just coordinates the work of that  
2 committee, but he's not - he doesn't have, like, executive  
3 authority over the committee.  
4

5 Q. Yes. Very well. That's what I'm getting at. So he  
6 is a coordinator of the teaching committee?

7 A. I don't know. I know he is a member of the teaching  
8 committee and of the writing committee. But his actual  
9 function I don't know.  
10

11 Q. And the teaching committee has the responsibilities  
12 set out in the branch organisation manual that we were  
13 looking at a few minutes ago; is that right?

14 A. Yes, the role that is mentioned there.  
15

16 Q. And that includes what will be taught in the various  
17 Kingdom of Ministry schools and a whole plethora of other  
18 means by which publishers around the world are taught about  
19 your word; is that right?

20 A. Some of the schools - some of these schools would be  
21 the responsibility of the service committee. If it is  
22 schools for elders and travelling overseers, the service  
23 committee would care for the --  
24

25 Q. Shepherd the Flock of God is the guiding textbook which  
26 would guide also the activities of the teaching committee?

27 A. Again, I think that would be probably something  
28 approved by the entire Governing Body, but perhaps coming  
29 more from the service committee, because it's service  
30 related.  
31

32 Q. I understand that you have not served as a member of  
33 the Governing Body, so I'm asking you from what your  
34 understanding is. But your understanding is that the seven  
35 members of the Governing Body, as a Governing Body, meet  
36 weekly, do they, every Wednesday?

37 A. Yes, so those who are present meet weekly.  
38

39 Q. It will be that Governing Body as a whole, or those  
40 who are present, who would authorise the various  
41 publications and guides and guidelines, and so on; is that  
42 right?

43 A. They would give the final approval for the publishing  
44 of them, yes.  
45

46 Q. You will have heard yesterday that senior counsel  
47 representing the Jehovah's Witnesses in Australia and the

1 Watchtower Bible & Tract Society of Australia said that  
2 Mr Jackson would not be likely to be able to assist this  
3 Commission, because his role is in the translation of  
4 matters. Now, that, do you accept, is in clear variance to  
5 what you have explained in your evidence?

6 A. No - sorry, it's not. The translation, it comes under  
7 the writing committee, as I understand, which is what  
8 Mr Jackson is a member of.

9  
10 Q. But he's also the coordinator of the teaching  
11 committee that has many other responsibilities, and not  
12 translation - not so?

13 A. Yes, he - as a member of the Governing Body, he has  
14 a number --

15  
16 Q. So can you explain, Mr O'Brien, how it came about that  
17 senior counsel representing the organisation was given  
18 instructions that Mr Jackson's role is confined to the  
19 translation of matters, when it clearly is not?

20 A. His role, as I understand, is principally translation,  
21 but translation is part of the writing committee. He - as  
22 a Governing Body member, he has numerous functions to  
23 perform, not just as a translator.

24  
25 Q. Yes, indeed. And as a consequence of those numerous  
26 functions, he would have knowledge across a whole scope of  
27 activity of the Governing Body - not so?

28 A. I guess he would have --

29  
30 Q. Far beyond translations?

31 A. Yes, yes, more than translation.

32  
33 THE CHAIR: Q. Mr O'Brien, did you give those  
34 instructions to senior counsel?

35 A. The instructions regarding Mr Jackson?

36  
37 Q. Yes.

38 A. Yes.

39  
40 Q. It led me to believe that there was little that  
41 Mr Jackson could add to the discussion, and no doubt that  
42 is what you expected would happen; is that right?

43 A. That's true, and I still concur with that.

44  
45 Q. Well, I'm starting to form a totally different  
46 impression, I have to tell you.

47 A. Well, if I could explain that Mr Jackson - his two

1 principal roles, as far as I understand, in the Governing  
2 Body are with the writing and - what's the other committee?  
3 The two committees I have mentioned, the writing and --  
4

5 MR STEWART: Q. Teaching?

6 A. And part of that involves translation. Mr Jackson was  
7 in the Pacific Islands for many years, understood many of  
8 the Pacific Island languages, helped --  
9

10 THE CHAIR: Q. I understand that he may have a role in  
11 translation. But I'm now coming to understand he has  
12 a significant role in relation to teaching, but also the  
13 general affairs of the Jehovah's Witnesses?

14 A. I - he wouldn't have involvement in matters to do with  
15 the coordinators' committee, which handles legal; nor with  
16 the service committee, which handles service matters.  
17

18 Q. But he sits at the top with others in relation to all  
19 of those committees, doesn't he?

20 A. No, they are - different Governing Body members are  
21 assigned specifically to different committees.  
22

23 Q. I understand that. But, nevertheless, the Governing  
24 Body, I assume, has the ultimate say in all things?

25 A. When things come back to them as a Governing Body,  
26 yes.  
27

28 Q. And he is a member of that?

29 A. Yes, he's a member of the Governing Body.  
30

31 Q. He is here in Australia?

32 A. He is with his father - well, I understand he is still  
33 in Australia. I don't talk with Mr Jackson, but  
34 I understand his father is gravely ill, very close to  
35 death, and that's why he is here, to be with his father.  
36

37 MR STEWART: Q. Mr O'Brien, how many editions of  
38 Watchtower and Awake! are published each year?

39 A. The Watchtower and Awake! in their public editions are  
40 published monthly. There is also a study edition of the  
41 Watchtower which is used in congregation meetings. That's  
42 also published monthly.  
43

44 Q. What other publications are regular periodicals to  
45 congregations - that congregations would get?

46 A. We have a monthly item called the kingdom ministry,  
47 which sets out the schedule for our mid-week meetings; and

1 then annually there are also released books or brochures.  
2 There's a Yearbook published every year.  
3  
4 Q. And how many articles are there generally in a  
5 Watchtower magazine?  
6 A. In the public edition - well, there are 16 pages, so  
7 depending on the size of the article, maybe six --  
8  
9 Q. And Awake!?  
10 A. Awake! would be similar.  
11  
12 Q. Sixteen pages?  
13 A. And the study edition of the Watchtower is 32 pages.  
14  
15 Q. And now, as I understand it, some publications or  
16 articles are specifically identified for group study by  
17 congregations during the course of the month?  
18 A. Yes, that's specifically The Watchtower study edition.  
19  
20 Q. So the whole of the study edition will be studied  
21 through the course of the month?  
22 A. Yes, or - in pursuing *[sic]* months. The November  
23 issue, for example, may not be studied  
24 until January/February. But there will be four or five  
25 study articles in that which would cover one month.  
26  
27 Q. With regard to the guide to publishers, the baptismal  
28 guide - are you familiar with the one I'm referring to? I  
29 may be using the wrong terminology.  
30 A. "Organised to Accomplish Our Ministry"?  
31  
32 Q. Yes. That is issued, as I understand it, when someone  
33 is baptised; is that right?  
34 A. Prior to that - when a person qualifies to share in  
35 the public preaching work, that's with the congregation,  
36 that's when they can obtain a copy.  
37  
38 Q. And then they have, as it were, a personal copy?  
39 A. They do.  
40  
41 Q. And they treasure it, I take it?  
42 A. Yes, well, that's then the book they use to review the  
43 questions for their baptism afterwards.  
44  
45 Q. Then when a new edition is published, maybe 10 years  
46 later, do they then get a copy of the new edition and use  
47 that? Does it replace the earlier one?



1 A. Yes, everyone in the congregations would receive the  
2 new updated copy.  
3  
4 Q. And the old ones are discarded or filed away for  
5 historical purposes?  
6 A. Yes, whatever they wish to do with them.  
7  
8 Q. Not regarded as current?  
9 A. No.  
10  
11 Q. In Australia, I understand from your statement that  
12 there are 821 congregations; is that right?  
13 A. That's right.  
14  
15 Q. There are 68,000 active members?  
16 A. That's correct.  
17  
18 Q. And if my arithmetic has not let me down, that would  
19 give an average congregation size of 83?  
20 A. I guess, on average, but some are much larger, some  
21 smaller.  
22  
23 Q. Yes. And congregants, as I understand it, tend to  
24 know each other and associate closely with one another; is  
25 that right?  
26 A. That's true, yes.  
27  
28 Q. Would it be true that amongst the Jehovah's Witness  
29 faith in Australia, there is a strong sense of community?  
30 A. Yes, I think that's very true. We probably refer to  
31 one another as brothers and sisters.  
32  
33 Q. And the congregation members gather to worship with  
34 each other twice a week and spend much of their social time  
35 in each others' company?  
36 A. Yes, twice a week, the congregation meetings. We  
37 probably also meet together again on a different occasion  
38 to share in our preaching activity, and maybe at other  
39 times, too.  
40  
41 Q. And they meet up to three times each year with larger  
42 groups at gatherings such as assemblies and conventions,  
43 where friendships continue to be maintained and  
44 strengthened; would that be right?  
45 A. It would be three times. We have two - twice a year  
46 we have a one-day, what we call an assembly, a circuit  
47 assembly, and once in the year we will have a three-day

1 convention.

2

3 Q. And as a faith, each member is genuinely concerned  
4 with the welfare of their fellow brothers and sisters as  
5 they refer to each other - that would be right?

6 A. That's correct.

7

8 Q. As one article, I think, describes it, would you  
9 accept this: the congregations are essentially  
10 a collection of overlapping families?

11 A. Overlapping families and individuals. Not all - like  
12 I'm the only person in my family, but now I've married my  
13 wife, but prior to that, I was the only member of my family  
14 who was a Jehovah's Witness.

15

16 Q. And so for a Jehovah's Witness, his or her social  
17 network is amongst other Jehovah's Witnesses?

18 A. I would say generally that would be the case, yes.

19

20 Q. I want to put to you a scenario. If you take a victim  
21 of sexual abuse in a congregation, where her attacker is in  
22 the congregation, and she reports that to the elders, and  
23 they cannot act judicially because there is not sufficient  
24 evidence - take that scenario. Now, that can happen,  
25 I think we've established that over the last 10 days?

26 A. That's possible, yes.

27

28 Q. Now, take the scenario that she feels silenced and  
29 unhappy with the organisation's response as a consequence  
30 of that. Do you see that?

31 A. Yes.

32

33 Q. And she cannot bear to be in the same organisation as  
34 her abuser and have to see him or face him, and as  
35 a consequence, she decides to leave the Jehovah's Witness  
36 organisation. Do you follow the scenario?

37 A. Yes, I've got that.

38

39 Q. Now, to do that - in other words, to leave - she must  
40 disassociate from the organisation; that's right, isn't it?

41 A. No.

42

43 Q. Well, if she leaves otherwise, she would, in any  
44 event, be regarded as an apostate?

45 A. No. If I could explain, to correct your thinking on  
46 that? If a person, for whatever reason, wishes to attend  
47 a different congregation, they are at liberty to. A person

1 is not bound to be in any particular congregation at any  
2 time. If, for personal reasons, they decided they no  
3 longer wanted to attend any congregation, to stop  
4 associating with Jehovah's Witnesses, they would be viewed  
5 as just an inactive Witness, and they are free to resume  
6 their activity any time they wished.

7  
8 If a person wants to take the step of actually  
9 disassociating themselves, wanting to be known no longer as  
10 one of Jehovah's Witnesses, and have that known to the  
11 congregation, that would be a step they would take, and we  
12 would try to assist them, if there was some way we could  
13 help them remain in the faith, but if they were adamant,  
14 then that would be their decision. But that's what  
15 disassociation is.

16  
17 Q. Let's take the scenario where this woman feels so  
18 silenced and unhappy in the organisation as a consequence  
19 of what I set out that she decides to disassociate, and  
20 that then means, as it is put in the manual, making known  
21 a firm decision to no longer be one of Jehovah's Witnesses;  
22 is that right?

23 A. That's right. That's disassociation, yes.

24  
25 Q. As I understand it, the same consequences then flow,  
26 insofar as how she is then treated by the remaining  
27 congregants, to if she had been disfellowshipped?

28 A. So that's because she has made that decision, not  
29 because the congregation has. A person who is  
30 disfellowshipped is disfellowshipped by the congregation  
31 for whatever actions that disqualified them. A person who  
32 disassociates themselves, they personally decide on that  
33 action, knowing that the consequences of disassociation  
34 mean that they will be cutting themselves off from the  
35 congregation, not the other --

36  
37 Q. Yes, indeed, but you see in the scenario that I have  
38 painted for you that this person's feeling is so deep that  
39 she wishes to disassociate from the congregation. Now, the  
40 consequence of that is that those, as it is said, in the  
41 truth, being Jehovah's Witnesses, are not allowed to  
42 associate with the disassociated person - that's right?

43 A. That's true. But it's because of the person's  
44 decision. If they just remained inactive, if they just  
45 wanted to not be coming along to the meetings, then they  
46 can still have free spiritual association with any of  
47 Jehovah's people.

1  
2 Q. I'm dealing with a scenario, as you well appreciate,  
3 where this person, because of the way in which her abuse  
4 occurred and allegation was dealt with, she wishes to  
5 disassociate.

6 A. Okay.

7  
8 Q. And the consequence of that is that those who remain  
9 are not allowed to fraternise or converse with the  
10 disassociated person; is that so?

11 A. I agree.

12  
13 THE CHAIR: Q. Mr O'Brien, what happens in the  
14 situation - I will go back a step. Do the elders of  
15 a particular congregation accept an obligation to care for  
16 the safety of those in that congregation?

17 A. Yes, that's why they are shepherds - to care for the  
18 flock of God.

19  
20 Q. And if an allegation is made by a woman that she has  
21 been sexually abused, which the elders, or at least the  
22 judicial committee, or those investigating, accept is true  
23 but there is not a second witness --

24 A. Yes.

25  
26 Q. -- in that situation, the elders would be continuing  
27 to accept the abuser as a member of that congregation,  
28 notwithstanding that they knew that he had sexually abused,  
29 wouldn't they?

30 A. Yes.

31  
32 Q. How is that reconciled with any obligation they have  
33 to care for the safety of those in that congregation?

34 A. Well, then, I think it was explained by Mr Spinks,  
35 that in that situation the elders would meet with the  
36 alleged abuser, even though it can't be proven, they would  
37 still have taken the victim's accusations to him or her and  
38 then, as a result of that, would give very clear direction  
39 on what restrictions would apply to their association with  
40 children, with others in the congregation, and they would  
41 monitor that.

42  
43 Q. And would others in the congregation know that that  
44 person had those restrictions placed on them?

45 A. No.

46  
47 Q. That means that supervision is confined to when the

1 elders or an elder is present and observes the abuser?  
2 A. That's true. But if it was reported to the elders -  
3 if it came to their attention that the person was in  
4 violation of the restrictions, well, then the elders would  
5 take firmer action. A person could even be  
6 disfellowshipped if they disregarded --

7  
8 Q. But that is dependent on the elder observing --  
9 A. Or it being reported.

10  
11 Q. How is it going to be reported if the others don't  
12 know to report it?

13 A. Perhaps - yes, I can't say. I don't know.

14  
15 Q. It wouldn't happen, would it?

16 A. No.

17  
18 Q. Do you think that's a proper discharge of the  
19 obligation - that you say they accept - to care for the  
20 safety of that congregation?

21 A. Again, it's governed by that scriptural command or  
22 requirement that elders are not authorised to go beyond  
23 that, that the matter be established at the mouth of two or  
24 three witnesses. So that they can take whatever care they  
25 feel is necessary to try to protect the congregation, but  
26 beyond that, unless there is a second witness to a similar  
27 type of event, or the same, then the elders' hands are tied  
28 with warning the person and --

29  
30 MR STEWART: Q. Can I take you to tab 120. That's  
31 Shepherd the Flock of God at page 115. That's  
32 Ringtail 116. Do you see in paragraph 5 - this chapter 10  
33 is headed "Matters Related to Disfellowshipped and  
34 Disassociated Ones", and you will see in paragraph 5 it  
35 says:

36  
37 *Disfellowshipped and disassociated ones are*  
38 *generally expected to make their own*  
39 *arrangements for transportation to and from*  
40 *congregation meetings. However, in some*  
41 *instances a disfellowshipped or*  
42 *disassociated individual who is making a*  
43 *determined effort to regain a right*  
44 *standing with Jehovah may be in a situation*  
45 *that prevents him from obtaining*  
46 *transportation. It may be that he has no*  
47 *car and that family members or others are*

1 not able to help him. Perhaps he cannot  
2 afford public transportation, or it is not  
3 available in his area. It may be that the  
4 distance involved, personal safety, or  
5 severe weather make it inadvisable to walk.  
6 In cases of such desperate need, the elders  
7 can determine whether some assistance may  
8 be provided ... Such assistance would be  
9 viewed as similar to public transportation  
10 in that there should be no fraternising or  
11 conversing with the disfellowshipped or  
12 disassociated person.

13  
14 That's the principle, isn't it - no conversing or  
15 fraternising with the disassociated person?

16 A. That's correct, yes.

17  
18 Q. Then in the next paragraph:

19  
20 *If members of the congregation are known to*  
21 *have undue association with*  
22 *disfellowshipped or disassociated relatives*  
23 *who are not in the household, elders should*  
24 *counsel and reason with those members of*  
25 *the congregation from the Scriptures.*  
26

27 So the position is that if a disassociated person is in the  
28 same household as a Jehovah's Witness on everyday matters  
29 in the household, there can be that association. But if  
30 they are not in the same household, the same rules apply as  
31 if they were not in the same family?

32 A. Yes, so with disfellowshipping and disassociation, if  
33 they live in the same household, then it's understood that  
34 it's referring, then, to spiritual association. Obviously,  
35 if it is a husband or wife or a child or mother or father,  
36 of necessity, there has to be conversation. But it's the  
37 spiritual association that would now be restricted.

38  
39 Q. But if they are not in the same household, then social  
40 association is also restricted?

41 A. Yes, kept to a minimum, at least.

42  
43 Q. You see there is then a reference there:

44  
45 *Review with them information from the*  
46 *"God's Love" book, pages 207-208 ...*  
47

1 I would like to take you to that. Part of this document is  
2 already in the tender bundle, but not this part. So are we  
3 to understand that these pages here, 207 and 208, are the  
4 guidance that is being referred to at what we were looking  
5 at a moment before - is that right?

6 A. That's correct, yes.

7  
8 Q. You will see halfway down page 207, starting on the  
9 right-hand side, it says:

10  
11 *The Watchtower of September 15, 1981,*  
12 *page 25, stated: "A simple 'Hello' --*

13  
14 A. Sorry, I have just missed where you are. Paragraph 2.

15  
16 Q. Yes, halfway down the page:

17  
18 *The Watchtower of September 15, 1981, page*  
19 *25, stated: "A simple 'Hello' to someone*  
20 *can be the first step that develops into*  
21 *a conversation and maybe even a friendship.*  
22 *Would we want to take that first step with*  
23 *a disfellowshipped person?"*

24  
25 Now, we are to understand that as applying also to  
26 a disassociated person, aren't we?

27 A. Yes.

28  
29 Q. Then the question is asked:

30  
31 *Is strict avoidance really necessary?*

32  
33 and the answer is:

34  
35 *Yes, for several reasons. First, it is*  
36 *a matter of loyalty to God and his Word.*  
37 *We obey Jehovah not only when it is*  
38 *convenient but also when doing so presents*  
39 *real challenges. Love for God moves us to*  
40 *obey all his commandments ...*

41  
42 and so on. At the foot of the next page, 208, starting the  
43 second line from the bottom, you will see it says:

44  
45 *Loyal Christian family members do not look*  
46 *for excuses to have dealings with*  
47 *a disfellowshipped relative --*

1  
2 that applies also to a disassociated relative, not so:  
3  
4 *not living at home.*

5  
6 A. Yes.

7  
8 Q. Then:

9  
10 *Rather, loyalty to Jehovah and his*  
11 *organisation moves them to uphold the*  
12 *Scriptural arrangement of*  
13 *disfellowshipping. Their loyal course has*  
14 *the best interests of the wrongdoer at*  
15 *heart and may help him to benefit from the*  
16 *discipline received.*

17  
18 Indeed, there are other publications that set out these  
19 forms of principle, aren't there?

20 A. That's true, yes, that's an understanding I have.

21  
22 Q. Now, the consequence in the scenario that I've put to  
23 you is that this survivor of abuse, who wishes to leave the  
24 organisation, is put to a choice, isn't she: she either  
25 stays in the organisation or she leaves and, thereby,  
26 potentially loses her whole family, or much of it,  
27 depending upon how many remain in the Witnesses, and her  
28 social network?

29 A. No, I think there's that other option that you have  
30 missed there, by just ceasing her activity in the  
31 congregation --

32  
33 Q. Well, I am presupposing, Mr O'Brien, that her feeling  
34 is sufficiently intense that she wishes to disassociate  
35 from the organisation.

36 A. Yes. So then she would appreciate the implication of  
37 that.

38  
39 Q. Yes. And her friends and family would face the  
40 implication, too, that they would have to disassociate from  
41 her.

42 A. Yes.

43  
44 Q. It is an impossible choice, isn't it? I mean,  
45 no-one - is it not right, Mr O'Brien - should be put to the  
46 choice of remaining in an organisation which she feels is  
47 protective of her abuser, and losing her family and social



1 network?  
2 A. Well, I can only be guided by what the scriptures say  
3 on that.  
4  
5 Q. Well, do you accept that it is psychologically  
6 devastating and cruel?  
7 A. The whole purpose of disfellowshipping or  
8 disassociation is to help the person see the benefits of  
9 associating, so a disassociated person, a disfellowshipped  
10 person, is free to come back. A disassociated person  
11 particularly, they don't have to go through a lengthy  
12 procedure to come back, whereas a disfellowshipped person  
13 has to prove their repentance suitably.  
14  
15 Q. It makes the organisation a captive organisation,  
16 doesn't it?  
17 A. I don't follow what you mean by that.  
18  
19 Q. Well, it makes it incredibly hard for someone to leave  
20 because of the huge pain, suffering, cruelty that she must  
21 face if she does leave.  
22 A. I don't believe so.  
23  
24 Q. Do you appreciate, Mr O'Brien, that this point of  
25 shunning, as it is called, is the one that probably makes  
26 people the most angry around the world amongst the  
27 ex Jehovah's Witnesses?  
28 A. But if it is disassociation - again, it's a choice  
29 they make. They don't have to disassociate themselves to  
30 stop associating. They don't lose their spiritual or  
31 familial association by being inactive.  
32  
33 Q. I can see you might get some support for it by the  
34 manner in which First Century Christians organised  
35 themselves, but is it justified, in today's world and  
36 today's morality, to treat people in this way?  
37 A. Well, personally, I - what is accepted as today's  
38 morality in many ways I wouldn't say is acceptable to  
39 a Christian.  
40  
41 MR STEWART: Your Honour, I tender the Branch  
42 Organisation January 2015 --  
43  
44 THE CHAIR: Before you do that, I will mark the "Keep  
45 Yourselves in God's Love" extract as 29-027.  
46  
47

1 EXHIBIT #29-027 EXTRACT FROM "KEEP YOURSELVES IN GOD'S  
2 LOVE"

3  
4 MR TOKLEY: I wonder if I might be heard briefly on the  
5 tender --

6  
7 THE CHAIR: Sorry, on the "Branch Organisation" document?  
8

9 MR TOKLEY: Yes, your Honour. I wonder if your Honour  
10 would be so good as to just accept the pages that have been  
11 referred to, but to still keep confidential those matters  
12 that have not been referred to. There is no public  
13 interest in those matters that have not been referred to.  
14 There is no purpose to be served --

15  
16 THE CHAIR: I haven't read the whole document. I don't  
17 know.

18  
19 MR TOKLEY: Your Honour, I imagine if they were relevant,  
20 my learned friend, counsel assisting, would have taken  
21 Mr O'Brien to those matters. The concern is simply that  
22 they are confidential to branch committee members, they are  
23 not for general distribution within the branch itself. We  
24 would seek to maintain their confidentiality.

25  
26 THE CHAIR: So you are telling me that members of the  
27 church don't know the rules that govern that church?  
28

29 MR TOKLEY: Your Honour, I suspect that they do in the  
30 sense that they are probably told them, but the document  
31 itself is confidential. I can understand --

32  
33 THE CHAIR: But if they know, then protecting it now is a  
34 little late, isn't it?  
35

36 MR TOKLEY: Your Honour, not really. Not really,  
37 your Honour. It's to protect that which is regarded as  
38 confidential within the organisation, and on the other  
39 hand, there is no public interest to members outside --  
40

41 THE CHAIR: I don't know about that, because I haven't  
42 read the whole document. But I can understand that the  
43 bits that we have discussed so far fit into the context of  
44 the whole document. Look, I think you would have to  
45 persuade me that there was any particular section that, by  
46 reason of the content, needed to be kept confidential,  
47 before I would take that step. You realise that royal

1 commissions, by convention, work in public.

2

3 MR TOKLEY: Yes, your Honour.

4

5 THE CHAIR: And the public has a right to know what it is  
6 we're looking at and, in relation to the organisation for  
7 which you appear, how that organisation is structured and  
8 managed to deal with these sorts of problems --

9

10 MR TOKLEY: Yes, your Honour.

11

12 THE CHAIR: The rules of the organisation are obviously  
13 important.

14

15 MR TOKLEY: They are, your Honour, and I don't argue  
16 against those parts which are relevant to the matters the  
17 Commission has to determine being made public. It's those  
18 parts which have not been referred to at all and which  
19 would not be of any assistance to the Commission which  
20 I seek to protect.

21

22 THE CHAIR: At the moment, it doesn't help me, because  
23 I haven't read the whole document, and you haven't given me  
24 any content beyond the fact that they haven't been referred  
25 to and, therefore, they shouldn't be --

26

27 MR TOKLEY: Understood, your Honour. If your Honour would  
28 be so good as to give us the opportunity to put a brief  
29 submission in writing, which your Honour can then consider  
30 at your Honour's leisure. If your Honour rules against me  
31 on that point, then so be it. Of course, we would accept  
32 the ruling. But if your Honour would give us the  
33 opportunity, I would be grateful.

34

35 THE CHAIR: Mr Stewart?

36

37 MR STEWART: Your Honour, I would certainly resist any  
38 restriction on the document, for two reasons: first, I,  
39 too, haven't had the opportunity to consider the whole of  
40 the document, so I'm not sure what other aspects --

41

42 THE CHAIR: Should we leave it on the basis, as Mr Tokley  
43 puts it, that we will keep what hasn't been referred to  
44 confidential at this stage, subject to him persuading us  
45 with a written submission?

46

47 MR STEWART: I am content to deal with it on that basis,

1 with some time frame, your Honour.  
2  
3 THE CHAIR: I will make the document exhibit 29-028.  
4 In terms of what has been referred to, if I look at the  
5 index - and I seem to have a page missing --  
6  
7 MR STEWART: Chapters 1, 2 and 3 were referred to.  
8  
9 THE CHAIR: Chapters 1, 2 and 3 I would have thought, on  
10 any view, have to be relevant, Mr Tokley; would that be  
11 right?  
12  
13 MR TOKLEY: Yes, your Honour.  
14  
15 THE CHAIR: I haven't looked at the content, but what  
16 about chapters 5 and 7?  
17  
18 MR STEWART: Yes, 5 and 7.  
19  
20 THE CHAIR: Mr Tokley?  
21  
22 MR TOKLEY: Your Honour, I can't see how 5 or 7 would  
23 assist, in the sense that by the looks of it, for example,  
24 under 5, it deals with accounting matters, allowances,  
25 auditing --  
26  
27 THE CHAIR: Its heading is "Publishing committee", which  
28 I assume means the publication of educational and other  
29 material.  
30  
31 MR TOKLEY: I think, your Honour, it deals with the  
32 financial aspects of such matters.  
33  
34 THE CHAIR: I don't know.  
35  
36 MR TOKLEY: No. That's why I seek the permission --  
37  
38 THE CHAIR: What about chapter 7?  
39  
40 MR TOKLEY: Chapter 7 is in relation to organisational  
41 matters. Chapter 7 may be relevant to your Honour's  
42 purposes, and I don't seek to argue against that.  
43  
44 THE CHAIR: What about chapter 8?  
45  
46 MR TOKLEY: I would have to review chapter 8, your Honour,  
47 to make sure.

1  
2 THE CHAIR: What I will do at the moment is I will allow  
3 publication of chapters 1, 2, 3 and 7, and if you can give  
4 me and the Commissioner a submission tomorrow, I will rule  
5 in chambers in relation to the matter on Friday.  
6

7 MR TOKLEY: Thank you, your Honour.  
8

9 THE CHAIR: So the whole document is exhibit 29-028, but  
10 I order that the chapters other than 1, 2, 3 and 7 at this  
11 stage not be published. Yes?  
12

13 **EXHIBIT #29-028 DOCUMENT HEADED "BRANCH ORGANIZATION**  
14 **JANUARY 2015" (CHAPTERS OTHER THAN 1, 2, 3 AND 7 ARE NOT TO**  
15 **BE PUBLISHED AT THIS STAGE)**  
16

17 MR STEWART: I have no further questions of this witness,  
18 your Honour.  
19

20 THE CHAIR: Does anyone else have any questions?  
21

22 MS DAVID: Yes.  
23

24 **<EXAMINATION BY MS DAVID:**  
25

26 MS DAVID: Q. Mr O'Brien, my name is Ms David, and  
27 I appear on behalf of [BCG] in these proceedings. Just one  
28 area of concern that in my view has been highlighted  
29 through these proceedings, and that is the manner in which  
30 the scriptures are used to assist a victim. Of course, it  
31 is accepted that it is an important part of the healing  
32 process --

33 A. Particularly spiritually, yes.  
34

35 Q. Spiritually. Again, I want to emphasise that I would  
36 think that you would agree that the Commission proceedings  
37 highlight the need for, really, a comprehensive approach,  
38 including spiritual, that must have psychological or other  
39 care given to the particular person abused, so not just  
40 spiritual guidance?

41 A. True, yes, I agree.  
42

43 Q. What concerns me - and I don't mean any of this as  
44 a criticism - is the way in which, sometimes, the  
45 scriptures have been used, for example, in the case of  
46 [BCG]. She has given evidence that she doesn't recall, in  
47 her particular case, receiving any scriptural guidance,

1 other than that she was essentially told in a letter from  
2 head office to keep her tears in a bottle. That particular  
3 document is tender bundle tab 30. Perhaps if that can be  
4 brought up, please. This was in response to a very long  
5 and rather - a letter from a clearly distressed victim of  
6 abuse, in which she had talked about the fact that she had  
7 been - essentially, she had a life sentence by reason of  
8 the abuse on her, and she spoke about her sister. She was  
9 clearly distressed. I won't repeat all the distress, but  
10 it's obvious. But in the response, she was essentially  
11 told, if you would agree, in paragraph 2 of that letter,  
12 firstly, "Always Throw Your Burden on Jehovah", and then  
13 she was told that:

14  
15 *The heart warming prayer of David is*  
16 *appropriate where he entreated Jehovah to*  
17 *preserve his tears in his "skin bottle".*  
18

19 Now, it is clear from her evidence that the manner in which  
20 she understood that was to silence her, to bottle it up.  
21 So what I'm asking you is how you see the organisation  
22 perhaps addressing how those scriptures are ministered to  
23 ensure that victims don't improperly internalise a bit of  
24 scripture to the point where they believe they have to  
25 bottle their pain - for example, as in this case?

26 A. Yes, so if that's how she interpreted it, it's  
27 a shame, because it's not the meaning of the scripture. It  
28 means that Jehovah would - he would preserve her tears. He  
29 would take them to himself, he would remember them, and he  
30 wouldn't forget them, because now they are kept in a skin  
31 bottle. But the point you are making is that she didn't  
32 interpret it that way, from the letter.  
33

34 Q. Yes.

35 A. Well, I think the article that is referred to there,  
36 in The Watchtower April 1, 1996 - and there are many  
37 articles - this is what I would say almost every elder  
38 would use on their shepherding calls visiting a victim of  
39 any kind, but particularly in this case, articles specific,  
40 with scriptures specific to the needs of the victim.  
41

42 Q. Yes. What I'm saying is: how do you see that that  
43 can be done without the danger that somebody like [BCG]  
44 will interpret or take that scripture isolated and feel  
45 that she must bottle her pain, or that she must just simply  
46 bear it and not do anything about it? Do you see any  
47 mechanism within your organisation to ensure that those

1 scriptures are not given in a way that is potentially  
2 damaging? Again, I stress I'm not being critical of the  
3 scriptures?

4 A. I agree, it's a good point. I think we do have an  
5 arrangement where that could easily be incorporated. We  
6 have every six months a circuit overseer visits  
7 a congregation. He meets with the elders. He arranges to  
8 go with elders on two or three shepherding calls on ones  
9 who have a need, and so we could maybe write and ask  
10 circuit overseers to specifically ask if there are victims  
11 of abuse in the congregation to make that a definite  
12 arrangement, if the person wanted to do that, and then  
13 ensure proper scriptures are used to console and comfort.  
14

15 Q. Would you see a benefit of perhaps consulting with an  
16 expert professional in the area of dealing with victims of  
17 abuse to ensure - to look at a more comprehensive approach  
18 of ministering those scriptures?

19 A. I think the point was made here at the Commission that  
20 there are Jehovah's Witnesses, probably men and women, who  
21 have expertise in psychology and psychiatry, and I can see  
22 definite value in consulting them on what they may suggest  
23 could be incorporated by elders who don't have that type of  
24 experience when they are shepherding victims such as [BCG]  
25 and others.  
26

27 Q. On the issue of The Watchtower, The Watchtower is  
28 studied - I think you have said that there is an edition  
29 that is the subject of study meetings?

30 A. That's true, yes.  
31

32 Q. If, for example, a person is not at that meeting, or  
33 not a member of the congregation at the time that that  
34 particular Watchtower is being considered, how would they  
35 ever know what was in it?

36 A. We have provision that is available to every member of  
37 the congregation, that was provided to the Commission here,  
38 it's called The Watchtower library on CD. Every year, that  
39 is updated with the latest publications, and in referencing  
40 that, it provides two indexes of publications going back  
41 many years and all a person, with even very basic computer  
42 knowledge, would need to do would be to type in "Child  
43 abuse", "Comfort" - whatever word - and that would bring up  
44 every article where that particular point is discussed. So  
45 the average Witness is very familiar with that.  
46

47 We also have an online program, Watchtower Online,

1 which has publications going back - Watchtower and Awake!  
2 publications - from the year 2000 to present, and the same  
3 research tool is there, to do a search on any word and it  
4 will bring up the publications that discuss that.

5  
6 Q. To ensure a consistency of approach by elders dealing  
7 with this issue in the congregation, do you advise them  
8 that they must have regard to all those publications?

9 A. Yes, the elders certainly are reminded at each visit,  
10 almost, with the circuit overseer, when he meets with the  
11 Body of Elders, he will talk to them about the needs of  
12 shepherding. I'm an elder in a congregation in addition to  
13 my other responsibilities, and there hardly would be  
14 a visit on a six-monthly basis where we are not given  
15 encouragement on our shepherding role in the congregation.

16  
17 Q. Just coming back to - just looking at it from the  
18 perspective of prevention, again, a person within the  
19 congregation, the general - the publisher or anybody that  
20 is baptised, they would not necessarily be minded to go to  
21 read these publications, would they, about child abuse,  
22 unless there was a fairly consistent and continual  
23 reminder? Is there any process to ensure that there is an  
24 ongoing education and prevention program directed at the  
25 members of a congregation?

26 A. I think if you visited the jw.org site, currently, in  
27 the broadcasting program for this month - there is one each  
28 month - there is a little video animated clip of parents  
29 helping their children to know how to defend themselves  
30 from abuse.

31  
32 Q. And that is this month. I guess what I'm asking you:  
33 what is the process to ensure that this is consistent from  
34 month to month, from day to day?

35 A. Well, there are so many issues confronting families  
36 and Jehovah's Witnesses, like the rest of the community,  
37 that we don't just focus on any one, obviously, each month,  
38 but from time to time articles are published. There is  
39 a publication particularly designed for parents - I think  
40 again, that was provided to the Commission - where the  
41 parents can discuss the story with their child, and one of  
42 them covers protecting themselves from abuse.

43  
44 MS DAVID: Thank you.



1 <EXAMINATION BY MS McGLINCHEY:

2  
3 MS McGLINCHEY: Q. Mr O'Brien, my name is Ms McGlinchey  
4 and I appear for Monty Baker in these proceedings?

5 A. Thank you.

6  
7 Q. Mr O'Brien, I just want to be clear on circumstances  
8 which will lead to a matter of sexual abuse being reported  
9 to the police, and it may be best for me to put a scenario  
10 to you and you can perhaps answer some questions on that  
11 scenario. So the scenario that I want to suggest is that  
12 a complaint comes to you of a sexual abuse of a child, and  
13 the abuser is the child's father, and the child remains at  
14 risk.

15 A. Okay.

16  
17 Q. Do you report the matter to the police?

18 A. In that scenario?

19  
20 Q. Yes.

21 A. The report - so there are a couple of issues in the  
22 scenario I would have to have clear - it was reported to me  
23 by the child to me, or by --

24  
25 Q. By any source at all.

26 A. If it was by the mother, I would presume, generally,  
27 then we would - I think as Mr Toole brought out earlier, we  
28 would ask the mother what she was doing to make sure the  
29 child was now protected from any further abuse. If she  
30 felt incapable of doing that --

31  
32 Q. The scenario was the assumption that the child remains  
33 at risk?

34 A. Yes. So if the child remains at risk and there is no  
35 responsible adult within the family to remove it from the  
36 further risk of abuse, then we would report that to the  
37 police.

38  
39 Q. Have you ever done that?

40 A. No, I've never had a need. I've never been involved -  
41 I think I mentioned in my submission that the only time  
42 I've had any involvement with child abuse was when I was  
43 a circuit overseer and was simply reporting the matter to  
44 the branch office so that it could be followed up by the  
45 congregation.

46  
47 Q. So you have never come across a situation like that

1 personally?  
2 A. No, never.  
3  
4 Q. In your knowledge of the church, have you ever heard  
5 of anybody else reporting a matter to the police - a matter  
6 of child sexual abuse?  
7 A. No, I haven't personally but, again, my area of  
8 responsibility within the branch committee doesn't deal  
9 with child abuse matters generally, but for the  
10 Royal Commission, I've taken the interest in it as a member  
11 of the branch committee and a director of Watchtower  
12 Society, to do that.  
13  
14 Q. And in the interest you have taken in it, just to be  
15 clear, you haven't come across or heard of any instances of  
16 a report to police?  
17 A. No, but that doesn't mean I haven't heard --  
18  
19 Q. I understand that.  
20 A. -- that it's not happening, either.  
21  
22 Q. Just moving on, the Jehovah's Witnesses has a legal  
23 branch?  
24 A. A legal branch?  
25  
26 Q. Yes.  
27 A. We have a legal department in the branch, yes.  
28  
29 Q. Legal department, I'm sorry. And that branch includes  
30 two practising solicitors - that's Mr O'Toole *[sic]* and  
31 Ms van Witsen.  
32 A. Mr Toole I think.  
33  
34 Q. Mr Toole, I am sorry.  
35 A. And Ms van Witsen, yes, that's correct.  
36  
37 Q. They are both Jehovah's Witnesses?  
38 A. That's right.  
39  
40 Q. And their office is located at Bethel - their legal  
41 office?  
42 A. Yes, their legal office, yes.  
43  
44 Q. Do they both reside at Bethel?  
45 A. They both reside there, yes.  
46  
47 Q. Is it the case, Mr O'Brien, that the other branches of

1 the Jehovah's Witnesses, however described, rely on the  
2 legal branch to keep you abreast on legal obligations?  
3 A. Sorry, when you say "the legal branch", you mean the  
4 legal department within the branch?

5  
6 Q. Yes, I'm sorry, yes.

7 A. Yes. So if a branch has a legal department - not all  
8 do, because not all have solicitors, sometimes it might be  
9 an adjunct to the service department - but if there is  
10 a legal department within the branch, then we do rely on  
11 legal advice. But the legal department itself may  
12 outsource advice, which has happened on a number of issues  
13 that we've faced.

14  
15 Q. Mr O'Brien, I just want to take you very briefly back  
16 to a matter that there has been considerable questions  
17 about in the Commission, and that is the role of women in  
18 the church.

19 A. Okay.

20  
21 Q. I want to just see if you can help me understand some  
22 of the spiritual and scriptural underpinnings of the role  
23 of the women - what women can do and what they can't, okay?  
24 Now, would you understand that 1 Timothy does provide  
25 guidance on that issue?

26 A. Yes, that's the scripture that was discussed yesterday  
27 regarding the role of women in the congregation, is it?

28  
29 Q. I think it might have partly been discussed yesterday,  
30 yes. Are you familiar with that scripture?

31 A. I think you would have to remind me of the specific  
32 verse. It's a --

33  
34 Q. Perhaps if I could read it to you. It is not very  
35 long.

36 A. No, that's okay, if you just give me the reference,  
37 I can --

38  
39 THE CHAIR: Q. It is 1 Timothy 2:11-12.

40  
41 MS McGLINCHEY: Q. Yes. If you have it in front of you,  
42 but for the benefit of everybody else, I will just read it,  
43 okay.

44 A. Sure.

45  
46 Q.  
47 *Let a woman learn in silence with full*

1           *submissiveness. I do not permit a woman to*  
2           *teach or to exercise authority over a man,*  
3           *but she is to remain silent. For Adam was*  
4           *formed first, then Eve. Also, Adam was not*  
5           *deceived, but the woman was thoroughly*  
6           *deceived and became a transgressor.*  
7           *However, she will be kept safe through*  
8           *childbearing, provided she continues in*  
9           *faith and love and holiness along with*  
10          *soundness of mind.*

11  
12       Is that a correct reading, do you agree?

13       A.   Yes, that's what the scripture says.

14  
15       Q.   I think that it's fairly clear that there is a very  
16       firm direction that a woman can't teach; correct?

17       A.   In the congregation, yes.

18  
19       Q.   And a woman is not permitted to have authority over  
20       a man?

21       A.   A baptised member of the congregation, yes.

22  
23       Q.   And is that one of the reasons why women can't be  
24       elders?

25       A.   One of the reasons is in that same chapter, if you  
26       look at chapter 3, it lists the qualifications of an elder,  
27       and it says, for example, in verse 1:

28  
29           *If a man is reaching out ...*

30  
31       Verse 2, he needs to be a husband; verse 4:

32  
33           *... a man presiding over his own*  
34           *household ...*

35  
36       Q.   I understand that and we did go through those  
37       yesterday?

38       A.   Yes.

39  
40       Q.   But can we just deal with 1 Timothy 2, because I want  
41       to ask you - well, firstly, do you agree that that is  
42       authority for why a woman can't be an elder?

43       A.   Because of the fact that that's what the scriptures  
44       designate. We don't feel we have authority beyond  
45       scriptures on that point.

46  
47       Q.   And this scripture says that a woman cannot exercise

1 authority over a man. Part of the role of an elder is to  
2 take such positions, such as a judicial member?  
3 A. That's true.  
4  
5 Q. Which would lead her into a situation where she may be  
6 required to have authority over a man?  
7 A. If she was an elder, you mean?  
8  
9 Q. And that's prohibited.  
10 A. Yes.  
11  
12 Q. Do you agree that, if you read on in Timothy, it sets  
13 out some of the reasons for those directions, and that,  
14 firstly, it was because Adam was formed first and then  
15 Eve - do you agree?  
16 A. So he - yes.  
17  
18 Q. And then it goes on to say:  
19  
20 *Also, Adam was not deceived, but the woman*  
21 *was thoroughly deceived and became a*  
22 *transgressor.*  
23  
24 What do you understand that to mean?  
25 A. Well, you would need to go back to the Genesis  
26 account, Genesis chapter 3 and the garden of Eden --  
27  
28 Q. Well, can I just ask you, what do you think that that  
29 sentence means?  
30 A. I believe it means what - as I said, the Genesis  
31 account of creation and the fall into sin, where Eve was  
32 deceived by the serpent, Satan, into thinking she could eat  
33 the fruit and not suffer any consequences. So she was  
34 deceived. The man was more culpable, because when she  
35 showed him the fruit and said what she had eaten, he wasn't  
36 deceived; he just simply was disobedient. And that's why  
37 the sin in the Bible is charged to Adam, not to Eve.  
38  
39 Q. Because women are more able to be deceived, therefore,  
40 less culpable?  
41 A. No, I don't think women are more able to be deceived.  
42  
43 Q. Do you agree that a reading of that sentence may  
44 suggest that men have natural attributes that better equip  
45 them to be in positions of responsibility?  
46 A. No, all I read into it is that this is how God has  
47 ordained his arrangements, and I accept that.

1  
2 Q. Do you agree that it does suggest that women do not  
3 have, perhaps, the intelligence to exercise  
4 responsibility --  
5 A. No.  
6  
7 Q. -- because Eve was thoroughly deceived and Adam  
8 wasn't?  
9 A. I think mankind - referring to the masculine gender -  
10 have been deceived equally as have women. Just Eve, in  
11 this particular instance that it is looking at, Was the one  
12 who was deceived by Satan, not Adam. He was more culpable  
13 because he was willfully disobedient. She was deceived.  
14 At least that's something to her credit, that --  
15  
16 Q. In this context - that is, Timothy - the scripture is  
17 setting out why a woman can't have authority over a man?  
18 A. No, I think that the following verses, in the  
19 qualifications for a person to be an elder, nominates and  
20 specifies that it needs to be a man. Not because a woman  
21 is deficient in her ability or intelligence or - we don't  
22 believe that for a minute.  
23  
24 Q. Do you believe that a woman has natural abilities  
25 equal to that of a man?  
26 A. In many respects she has qualities and abilities that  
27 a man doesn't have.  
28  
29 Q. And do you believe that women have equal intelligence  
30 to men?  
31 A. Certainly, because that's --  
32  
33 Q. And that's generally held to be true in the Jehovah's  
34 Witnesses?  
35 A. Definitely, yes.  
36  
37 Q. Do you believe that women have equal qualities in  
38 terms of other skills or attributes, such as wisdom and the  
39 ability to look at evidence fairly?  
40 A. If I could just labour the point for a moment to  
41 answer that --  
42  
43 Q. I would like you to answer my question.  
44 A. Yes, I will answer it, but the formation of the  
45 Christian congregation in the beginning by Jesus Christ -  
46 he selected the 12 apostles. He didn't set them up to be  
47 a governing body or a body of elders or a congregation. He

1 sent them out to preach by twos. Later on, he sent 70  
2 others to preach. The entire book of Acts shows that the  
3 purpose of the Christian congregation is to preach the good  
4 news of the kingdom. Men and women do that equally as  
5 well, many women far more effective, as preachers, than are  
6 men. So to assume that we would feel, as Jehovah's  
7 Witnesses, that women are in some way deficient to men - we  
8 don't think that for a moment. We love and respect the  
9 women who are taking this good news of the kingdom into the  
10 field.

11  
12 Q. Mr O'Brien, it's not just a coincidence that women are  
13 not in positions of responsibility in Jehovah's Witnesses,  
14 is it?

15 A. Not a coincidence?

16  
17 Q. Not just a coincidence?

18 A. No, it is scripturally based. Is that what you mean?  
19 I'm sorry.

20  
21 Q. Yes, yes, I do. So are you saying to me that, despite  
22 the fact that the church believes that women are capable,  
23 women are intelligent, women have wisdom and judgment, they  
24 will still never be elders in your church?

25 A. As long as that's God's word, that's how we would have  
26 to view it, yes.

27  
28 THE CHAIR: Q. Mr O'Brien, I discussed this yesterday  
29 with other people, but if you look at verses 11 and 12 --

30 A. Of chapter?

31  
32 Q. Chapter 2?

33 A. Yes.

34  
35 Q.

36 *Let a woman learn in silence with full*  
37 *submissiveness.*

38  
39 Does the church apply that?

40 A. Sorry, I missed the question, your Honour.

41  
42 Q. The words are:

43  
44 *Let a woman learn in silence with full*  
45 *submissiveness.*

46  
47 Does the church apply that injunction today?

1 A. Yes, as far as - if you go back, in context, in verse  
2 8 and 9 it's talking there about men carrying on prayer in  
3 the congregation, so it's not just in her home. So in the  
4 congregation setting, the women are not assigned to teach.  
5  
6 Q. Well, no, more than that: are they to learn in  
7 silence?  
8 A. We understand that women are free to comment at our  
9 meetings, but under the direction and oversight of a man,  
10 one of the elders who is a teacher. He can invite a woman  
11 to comment on a point, but he is the one doing the  
12 teaching.  
13  
14 Q. So you don't apply that in those terms?  
15 A. Not literally, that she can't speak in the  
16 congregation meeting.  
17  
18 Q. It goes on:  
19  
20 *I do not permit a woman to teach ...*  
21  
22 Do you apply that?  
23 A. Yes, so the woman doesn't teach in the congregation.  
24 That's the context of the chapter here.  
25  
26 Q. And then:  
27  
28 *... or to exercise authority over a man,*  
29 *but she is to remain silent.*  
30  
31 A. Yes.  
32  
33 Q. Do you apply that?  
34 A. Yes, in the context of the congregation; again, not in  
35 her home or in the general preaching work, which is not  
36 a congregation teaching. And that is why --  
37  
38 Q. So women do teach, they just can't teach in the  
39 congregation; is that the idea?  
40 A. That's the point, yes.  
41  
42 THE CHAIR: Very well.  
43  
44 MS McGLINCHEY: I don't have anything further,  
45 your Honour. Thank you.  
46  
47 THE CHAIR: Do either of you have any questions?



1  
2 MR TOKLEY: No, your Honour, thank you.

3  
4 THE CHAIR: Very well. Mr Stewart?

5  
6 MR STEWART: Your Honour, there is a matter that I, in  
7 fairness, must put to Mr O'Brien.

8  
9 <EXAMINATION BY MR STEWART:

10  
11 MR STEWART: Q. Mr O'Brien, you have given evidence that  
12 you gave instructions to counsel on the point of Mr Jackson  
13 not being able to assist and his activities being in  
14 relation to translations. I, as a matter of fairness, must  
15 put to you that those instructions you gave were false,  
16 were they not?

17 A. No, I don't believe so. Mr Jackson does oversee the  
18 translation work, but as part of the writing committee  
19 member, which he is one of the Governing Body members on  
20 that committee. So --

21  
22 Q. And I suggest to you, or I put to you, that when you  
23 gave those instructions, you knew them to be false?

24 A. No. I disagree.

25  
26 Q. And by giving those instructions, you sought to  
27 mislead the Royal Commission, to protect Mr Jackson from  
28 any potential summons to appear?

29 A. No, I disagree. I think the reason we asked  
30 consideration to be shown to Mr Jackson was the grave  
31 situation of his father - the very reason he is in  
32 Australia.

33  
34 Q. Yes, and in relation to that, in view of what I have  
35 put to you, perhaps you can answer this: how are we to  
36 know if what you say about Mr Jackson's compassionate  
37 circumstances is, in fact, true?

38 A. We could provide an affidavit, if you wish; we could  
39 provide doctors' reports on his father - whatever the  
40 Royal Commission would like. I'm sure we can arrange for  
41 that.

42  
43 THE CHAIR: Q. How long has he been in Australia?

44 A. I am not sure, your Honour, but I think maybe a week  
45 or two - a couple of weeks, perhaps.

46  
47 MR STEWART: Q. He has been here since before 14 July,

1 hasn't he?  
2 A. I don't know, specifically. I could find out, but  
3 I don't know exactly when he arrived. But it is only  
4 within the last couple of weeks.

5  
6 MR STEWART: I have nothing further, your Honour.

7  
8 THE CHAIR: Yes, thank you, Mr O'Brien. That concludes  
9 your evidence. You are excused.

10  
11 THE WITNESS: Thank you very much.

12  
13 <THE WITNESS WITHDREW

14  
15 MR STEWART: Your Honour, I do have some documents to  
16 tender. They are arranged individually, so I will tender  
17 them one by one, if I may.

18  
19 THE CHAIR: How many documents are there?

20  
21 MR STEWART: Five, your Honour. We're going to give them  
22 to you in a little bundle, your Honour, all five of them.

23  
24 THE CHAIR: Do I mark them together or do I mark them  
25 separately.

26  
27 MR STEWART: Separately, if you would, your Honour.

28  
29 THE CHAIR: Just identify them, and I will give them  
30 a number.

31  
32 MR STEWART: Yes.

33  
34 THE CHAIR: You can step down, Mr O'Brien.

35  
36 THE WITNESS: Thank you.

37  
38 MR STEWART: The first document is an email of 16 July  
39 from Milton Bray to the Royal Commission setting out  
40 Jehovah's Witness membership statistics.

41  
42 **EXHIBIT #29-029 EMAIL OF 16/07/2015 FROM MILTON BRAY TO THE**  
43 **ROYAL COMMISSION SETTING OUT JEHOVAH'S WITNESS MEMBERSHIP**  
44 **STATISTICS**

45  
46 MR STEWART: The second is a revised version of the notes  
47 of the investigating committee. Your Honour, in fact,

1 perhaps the best way of dealing with this is not as a new  
2 tender, but it is to replace the existing --

3

4 THE CHAIR: I will mark it separately.

5

6 MR STEWART: As your Honour pleases. So it is the notes  
7 of the investigating committee taken by Mr Ali. I am  
8 sorry, your Honour, it is the typed transcription of the  
9 notes.

10

11 THE CHAIR: I can see that.

12

13 **EXHIBIT #20-030 REVISED TRANSCRIPTION OF NOTES OF THE**  
14 **INVESTIGATING COMMITTEE TAKEN BY MR ALI**

15

16 MR STEWART: The third is the results of the Watchtower  
17 case file analysis summary prepared by Royal Commission  
18 staff. If I can explain - because this has passed between  
19 my learned friends for the Watchtower Bible & Tract Society  
20 and those assisting me over the last several weeks - we  
21 have removed from the spreadsheet all the names of people  
22 and also all the congregations. So what is left is the raw  
23 data, in case there is any debate about the summary  
24 analysis in submissions. I tender that.

25

26 **EXHIBIT #29-031 RESULTS OF THE WATCHTOWER CASE FILE**  
27 **ANALYSIS SUMMARY PREPARED BY ROYAL COMMISSION STAFF, WITH**  
28 **NAMES OF PEOPLE AND CONGREGATIONS DELETED**

29

30 MR STEWART: Then there are extracts from "Organised to  
31 Accomplish Our Ministry", 1983.

32

33 **EXHIBIT #29-032 EXTRACTS FROM "ORGANISED TO ACCOMPLISH OUR**  
34 **MINISTRY", 1983**

35

36 MR STEWART: And extracts from "Pay Attention to  
37 Yourself and to All the Flock", 1991.

38

39 **EXHIBIT #29-033 EXTRACTS FROM "PAY ATTENTION TO YOURSELVES**  
40 **AND TO ALL THE FLOCK", 1991**

41

42 MR STEWART: That is all I have. I do have a standard  
43 order for submissions, your Honour.

44

45 THE CHAIR: Before I come to that, Mr Tokley, at the  
46 moment I am troubled by what I now understand as to the  
47 role of Mr Jackson in the organisation. It does seem that,

1 having regard to the issues we have canvassed, he would be  
2 able to help. Do you want to respond to that?

3

4 MR TOKLEY: Your Honour, I can respond. I can certainly  
5 try to take further instructions. For reasons which are  
6 obvious, I think, your Honour is entitled to whatever  
7 assistance should be provided to your Honour. My  
8 understanding remains as I was instructed, that in relation  
9 to these legal matters, Mr Jackson would be of no  
10 assistance.

11

12 THE CHAIR: It's not legal matters. The discussion has  
13 moved a little from the history to the future.

14

15 MR TOKLEY: Yes.

16

17 THE CHAIR: At the moment, I can presently understand the  
18 injunction that is felt in relation to elders, but  
19 a process, a deliberative process for the church - it's  
20 possible to imagine it being one which was not entirely  
21 conducted by elders. But, secondly, a process which the  
22 church engages in because of its adherence to the Bible,  
23 which allows a person who those who are deciding the matter  
24 have no doubt has committed the abuse, to, nevertheless,  
25 remain in the community, raises other issues as well.

26

27 MR TOKLEY: Yes, your Honour, I understand.

28

29 THE CHAIR: They won't have eluded you or Mr Coyne, as  
30 they were raised.

31

32 MR TOKLEY: No, your Honour.

33

34 THE CHAIR: I mean, if you put yourself in a position to  
35 care for other people and you fail, then consequences flow.

36

37 Now, these are issues which clearly have emerged from  
38 our discussion, and we would like as much help as we can.  
39 As he is in the country, it would seem logical that we ask  
40 him to come and help us.

41

42 MR TOKLEY: I understand your Honour's point and I am not  
43 seeking to not address your Honour's point.

44

45 THE CHAIR: No, I understand that. Having said that,  
46 I appreciate the circumstances of his father, but we all  
47 have to face those difficulties from time to time in our

1 lives.

2

3 MR TOKLEY: Yes, your Honour.

4

5 THE CHAIR: What I'm going to say is I would like you to  
6 take up the matter with Mr Stewart and we will make  
7 arrangements some time next week to hear evidence from  
8 Mr Jackson, unless Mr Stewart comes to me and says that  
9 that can't be done.

10

11 MR TOKLEY: I understand, your Honour.

12

13 THE CHAIR: Secondly, beyond that, Mr Stewart has -  
14 I haven't seen it - a standard form of directions for  
15 submissions. Is that right?

16

17 MR STEWART: Yes, your Honour.

18

19 THE CHAIR: Has that been agreed between everyone?

20

21 MR STEWART: I'm not sure that it has been agreed. I did  
22 canvass it with some, but we have four weeks for  
23 submissions from our side and four weeks for other  
24 interested parties, so it is fairly --

25

26 THE CHAIR: Fairly standard. Unless anyone says  
27 otherwise, I will make those directions.

28

29 But can I say this - I suppose, Mr Tokley, to you  
30 again, I'm sorry --

31

32 MR TOKLEY: Not at all, your Honour.

33

34 THE CHAIR: It will be quite apparent now that some of the  
35 documentation of your clients just doesn't fit either the  
36 practice or what they accept should be the position. What  
37 we would like from you is a draft of the revisions which  
38 you proffer as appropriate, having regard to the discussion  
39 that has taken place.

40

41 MR TOKLEY: I understand why your Honour would say that.  
42 I'm again not seeking to avoid assisting the Commission or  
43 to assist your Honour. I think that the process that may  
44 be contemplated, though, in light of what has fallen during  
45 the last two weeks, is for there to be a review of the  
46 procedures, but also, at the same time, for those  
47 procedures to be considered by professional persons, such

1 as, for example, a psychiatrist or psychologist or  
2 a professionally trained counsellor, to ensure that any  
3 proposed revision would not result in further trauma being  
4 caused.

5

6 THE CHAIR: That may be a course that obviously has  
7 attraction.

8

9 MR TOKLEY: Yes, your Honour.

10

11 THE CHAIR: But the starting point is to identify where  
12 you or your client accepts the problems are - and some of  
13 those are blatantly obvious from the words, not according  
14 to the practice, and then, moving on from there, what steps  
15 your client might take to bring its processes and its  
16 documentation up to an appropriate position.

17

18 MR TOKLEY: Yes, your Honour.

19

20 THE CHAIR: That may include consultation with  
21 professional people, which is what has happened in other  
22 organisations we have looked at. For example, the YMCA  
23 have conducted a complete review with the help of  
24 professional people.

25

26 MR TOKLEY: Yes, your Honour.

27

28 THE CHAIR: We would be looking for you to proffer to us  
29 what your client accepts would be the appropriate course to  
30 take, and then we can have a look at it.

31

32 MR TOKLEY: Yes, your Honour.

33

34 THE CHAIR: If we don't agree, we will say so. If we  
35 think it should go further, we will say that as well. But  
36 the starting point is to understand what your client  
37 accepts should happen.

38

39 MR TOKLEY: Yes, your Honour, understood. I anticipate  
40 that part of our submissions will be devoted to the matters  
41 your Honour has raised with me, and it will probably set  
42 out the steps that will be involved as well in dealing with  
43 that aspect of the matter.

44

45 THE CHAIR: What we will then do - we live for another two  
46 and a half years: we will come back to you and we will  
47 expect to be told what has happened.

1  
2 MR TOKLEY: I don't know about that, your Honour.  
3  
4 THE CHAIR: We will do that. There is no doubt we will do  
5 that.  
6  
7 MR TOKLEY: I suppose what I was saying, your Honour, is  
8 that I wouldn't have thought that such a process would take  
9 two and a half years.  
10  
11 THE CHAIR: I don't know. I hope it doesn't.  
12  
13 MR TOKLEY: One hopes so, your Honour.  
14  
15 THE CHAIR: But we will come back to you within the two  
16 and a half years, as we're doing with other organisations,  
17 to ask your client: What have you done? And we will  
18 expect that process to occur in public. All right?  
19  
20 MR TOKLEY: Yes, thank you, your Honour. Just before my  
21 learned friend rises, I can assure your Honour that there  
22 was no intention, obviously, on my part to mislead  
23 your Honour in any way.  
24  
25 THE CHAIR: We accept that.  
26  
27 MR TOKLEY: Thank you, your Honour. The other aspect of  
28 it is that, if I may, it may be necessary for my learned  
29 friend Mr Stewart and I to perhaps approach your Honour in  
30 relation to Mr Jackson's medical condition, simply because  
31 of the privacy of the matter, and to inform your Honour --  
32  
33 THE CHAIR: It is the medical condition of his father.  
34  
35 MR TOKLEY: Yes, your Honour, I beg your pardon.  
36  
37 THE CHAIR: That is as I understand it.  
38  
39 MR TOKLEY: Yes, it is.  
40  
41 THE CHAIR: At the moment that's all I know, and that's  
42 not enough for me, now, given what I know about his role in  
43 the organisation --  
44  
45 MR TOKLEY: Understood, your Honour.  
46  
47 THE CHAIR: -- to say that we shouldn't have the benefit

1 of his understanding.

2

3 MR TOKLEY: No. I think I will endeavour to obtain  
4 a consultant specialist report on the matter.

5

6 THE CHAIR: That won't actually necessarily solve the  
7 problem.

8

9 MR TOKLEY: I understand, your Honour.

10

11 THE CHAIR: It is regrettable and I appreciate his  
12 position, but we all have to face these issues as well as  
13 our other responsibilities, and this Royal Commission, of  
14 course, carries great responsibilities for many, many  
15 people, some of whom are members of his church.

16

17 MR TOKLEY: Yes, it is understood, your Honour.  
18 Thank you, your Honour.

19

20 MR STEWART: If I might hand up the direction with regard  
21 to submissions, it is self-explanatory, I believe.

22

23 If there is to be any appreciable delay on the matters  
24 your Honour has been discussing with my learned friend,  
25 then he might approach your Honour with regard to an  
26 amendment of the direction.

27

28 THE CHAIR: Yes. Well, we will face that when we come to  
29 it, if we need to. Otherwise, I have made the directions  
30 in those terms.

31

32 Mr Tokley, feel free to approach Mr Stewart, if that's  
33 necessary.

34

35 MR TOKLEY: Thank you, your Honour.

36

37 THE CHAIR: The expectation we have is that at an  
38 appropriate time next week there will be maybe one or two  
39 hours set aside.

40

41 MR TOKLEY: Understood, your Honour. The only other thing  
42 I think is Dr Applewhite's separate report. Does  
43 your Honour require that to be incorporated into the  
44 orders? Your Honour mentioned two weeks.

45

46 THE CHAIR: Two weeks is what I said. I think that's  
47 plain.



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MR TOKLEY: Yes, your Honour.

THE CHAIR: Are we going to get one?

MR TOKLEY: Yes, your Honour.

THE CHAIR: All right, then we look forward to it.

MR TOKLEY: Your Honour, can it be two weeks from today, simply because --

THE CHAIR: You are asking for an extension?

MR TOKLEY: If I may, please, your Honour.

THE CHAIR: She can have two weeks from today.

MR TOKLEY: Thank you, your Honour.

THE CHAIR: But no more.

We thank everyone for your assistance. It may be necessary for us to resume again next week, but people will be notified in due course. Otherwise, we will adjourn.

**AT 4.10PM THE COMMISSION WAS ADJOURNED ACCORDINGLY**

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