

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

3  
4 JASON E. COBB, )  
5 PLAINTIFF, )  
6 VS. )  
7 ERNEST BREDE, et al., )  
8 DEFENDANT. )  
9 -----)

COPIES

CASE NO. CIV508137

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

BEFORE HONORABLE JONATHAN E. KARESH  
DEPARTMENT 20  
WEDNESDAY, FEBRUARY 22, 2012

A P P E A R A N C E S:

FOR THE PLAINTIFF: APPEARING IN PRO PER  
FOR THE DEFENDANTS: ANTHONY SMITH, ESQ.  
FOR ERNEST BREDE: CALVIN ROUSE, ESQ.

26 REPORTED BY: JOAN WOODS, CSR 4573

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1 Redwood City, CA Wednesday, February 22, 2012

2 P R O C E E D I N G S

3 - - - - -

4 THE COURT: Good morning, everybody. Calling  
5 the matter sent to us from Master Calendar, Cobb versus  
6 Brede.

7 MR. SMITH: Good morning, Your Honor. Anthony  
8 Smith appearing on behalf of defendants.

9 MR. ROUSE: Calvin Rouse on behalf of one of  
10 the defendants, Mr. Brede.

11 THE COURT: And where is Mr. Cobb?

12 MR. COBB: I am Mr. Cobb. I am appearing pro  
13 per plaintiff.

14 THE COURT: Did you have a chance -- taking a  
15 position on whether or not Mr. Rouse can come in and  
16 participate in this hearing, did they file an  
17 application pro hoc vice?

18 MR. SMITH: That was granted this morning by  
19 Judge Swope. I do have a copy of the order if you would  
20 like to see it.

21 THE COURT: Not at all. I didn't see it in the  
22 file. So, he must have it. I was prepared to grant it.  
23 So, that's not an issue.

24 The issue that I have for the hearing is how  
25 you wish to proceed. Who wants to argue this, Mr. Rouse  
26 or Mr. Smith? Maybe educate me a little bit on how this

1 hearing is suppose to go.

2 MR. ROUSE: I will do it if you want me to,  
3 Your Honor.

4 MR. SMITH: I was going to say, we do have two  
5 witnesses here. We have parties here, but we do have  
6 two individuals who are non-parties who may be called as  
7 witnesses at some point. I imagine they would need to  
8 step outside however the Court deems appropriate.

9 THE COURT: When there is testimony we will  
10 send them out.

11 MR. ROUSE: Your Honor, a complaint was filed  
12 against these three named party defendants who are  
13 ministers in a local Menlo Park Congregation of  
14 Jehovah's Witnesses. They are the current ministers of  
15 the congregation. And the complaint was filed by our  
16 ex-minister, one that has been removed by the  
17 organization.

18 And I say "organization." I am general counsel  
19 for the National Organization of Jehovah's Witnesses out  
20 of Brooklyn, New York. Ordinarily, I wouldn't be here,  
21 but this is one of our 13,000 congregations in the  
22 United States. We are a hierarchal religion structured  
23 just like the Catholic Church. And when the order from  
24 the Pope comes down in the church defrocking a priest  
25 and kicking him out, he no longer has any say in any  
26 matter in the local parish priest -- in the parish.

1           The same situation as here. In his complaint  
2 he brings one claim. He claims that he wants to be  
3 reinstated as a director and an officer in the Menlo  
4 Park Congregation. This is contrary to our church rules  
5 and regulations and bylaws.

6           We brought our organizational bylaws book, our  
7 rule book here, and we are prepared to present witnesses  
8 that this is a hierarchal organization. It is governed  
9 from the top down. We are protective of property rights  
10 and office holding rights of any degree at all in any of  
11 our churches.

12           And I am representing the presiding minister,  
13 Mr. Brede here. And so we challenge that. We say that  
14 that is a matter of First Amendment constitutional law.  
15 He can't do an end run as a defrocked minister and try  
16 to get his toe back in the administrative structure of  
17 our religion and by means of a court order. So, that's  
18 one point we are going to show through the evidence.

19           The other is that he let the statute of  
20 limitations run clearly in regard -- even under  
21 California law for a bringing a challenge like this.

22           THE COURT: Mr. Cobb, do you want to tell me  
23 anything before we start the hearing?

24           MR. COBB: Well, I will do the best I can under  
25 the circumstances, Your Honor. I am pro per. It was  
26 not my expectation that there would be a hearing today.

1 So, I am only partially prepared. Ideally there would  
2 be a continuance or consideration given on that basis.

3 THE COURT: That is something that should have  
4 been done in front of the presiding judge. I am here to  
5 hear the hearing. That continuance request is denied.

6 MR. COBB: No problem.

7 So, I will be prepared to speak to the points  
8 as represented today as best I can. I have evidence  
9 that I can share. I too may call upon any number of  
10 witnesses to the extent that they can cooperate and  
11 support points provided herein.

12 THE COURT: Okay. That is fine. Let me just  
13 set up my computer, which I use to take notes.

14 MR. COBB: May I retrieve something from my  
15 seat?

16 THE COURT: Sure. Please.

17 Mr. Rouse or Mr. Smith, which one of you wants  
18 to call the first witness? Who will be doing the  
19 examination?

20 MR. SMITH: Well, it is my understanding that  
21 Mr. Cobb has the burden here.

22 THE COURT: Right.

23 MR. SMITH: So, we were kind of going to see  
24 how he was going to present his case. And then Mr.  
25 Rouse will handle the direct of Mr. Brede I would  
26 imagine. But it is somewhat dependant upon plaintiff's

1 case.

2 That raises another housekeeping concern, Your  
3 Honor. Mr. Cobb is in pro per. And so as to not try to  
4 get the hearing -- unnecessarily delay the hearing, is  
5 there a way you would suggest we handle any objections  
6 that may be presented? There is a possibility being he  
7 is not trained in the law that could be an issue.

8 THE COURT: I will leave it to whoever one of  
9 you wants to object. But I prefer to just one. So, you  
10 can make that decision.

11 Mr. Cobb, did you have any evidence you wanted  
12 to present about what's going on here? Who do you wish  
13 to call as a witness?

14 MR. COBB: Well, I would like to begin my  
15 initial statement in response to what was presented by  
16 Mr. Rouse.

17 THE COURT: Do you want to testify yourself  
18 basically?

19 MR. COBB: I will need to do that at some point  
20 in the morning.

21 THE COURT: That is fine, but if you  
22 essentially want to present an opening statement, please  
23 do.

24 MR. COBB: So, in reviewing the defendant's  
25 hearing brief we are identifying arguments that have  
26 been presented previously through any number of venues,

1 circumstances, points that has been presented previously  
2 at the constitutional law defense citing the  
3 organization is a religion organization, Jehovah's  
4 Witnesses as being a hierarchal organization or a  
5 hierarchy.

6 So, certainly the Court is probably familiar  
7 with the fact that the term "hierarchy" is one of any  
8 number of forms of church government. And they have a  
9 particular implication as it relates to legal matters.

10 The reality of the situation is that Jehovah's  
11 Witnesses as a religious organization are not a  
12 hierarchy. Jehovah's Witnesses do not use that  
13 terminology in any area relative to its beliefs. The  
14 beliefs that we hold as individuals are beliefs we  
15 promote by virtue of our preaching and teaching work in  
16 our community.

17 Presbyterian, hierarchy, congregational, all  
18 three of these terms are irrelevant when it comes to the  
19 organization known as Jehovah's Witnesses. The term  
20 that is utilized to describe the manner of structure and  
21 government, if you will, is theocratic. So, in some  
22 respects that might be more akin to congregational for a  
23 lay person to immediately embrace.

24 But one of the things that we will address is  
25 the reality that Jehovah's Witnesses are not a  
26 hierarchal religious organization. There is an



1 organizational structure with different points of  
2 responsibilities. But we do not view ourselves as a  
3 hierarchy and I do have evidence to present from the  
4 flagship journal of Jehovah's Witnesses in the entire  
5 world, The Watch Tower magazine, which will clearly  
6 support the statements I have just made.

7           The next point, too, that we will want to  
8 consider in the proceeding is the point of  
9 ecclesiastical abstention. That concept does not apply  
10 in this particular case. There is no question of  
11 religion belief or doctrine, so forth.

12           What we have here at the most basic level is  
13 two different considerations. There are the religious  
14 considerations and everything that Mr. Rouse stated is  
15 correct. I and others were removed from positions of  
16 spiritual oversight in the congregation. However, as we  
17 all know, corporation is a separate legal entity. And  
18 the only way to create a marriage between any  
19 philosophical or religious point of view and that legal  
20 entity would be by and through the bylaws. So, one of  
21 the key points here is that there were no bylaws that  
22 had ever been formed for our corporation in existence.  
23 We have articles of incorporation from 1980, but we  
24 never had any bylaws. So, in the absence of bylaws  
25 California Corporations Code repeatedly establishes time  
26 and again throughout that in the absence of bylaws

1 essentially all considerations default to the letter of  
2 the law.

3           The letter of the law establishes a process to  
4 remove directors from office. The letter of the law  
5 establishes a process for directors to be voted in and  
6 those rules, regulations and formalities were not  
7 adhered to.

8           There is a recognition of that fact on the part  
9 of the defendants, but their attempt here today is to  
10 essentially take advantage of the Court's ignorance, if  
11 I may use that expression, so that you will default to  
12 the frame work of decision making based on the term  
13 "hierarchy" over and above reality of the structure that  
14 exists for Jehovah's Witnesses.

15           So, we will speak to that. And to a great  
16 extent if hierarchy is not used as a basis to invoke  
17 privilege, then their argument largely fails.

18           As far as the last point, statute of  
19 limitations, there was an attempt to hold a corporate  
20 meeting again without the benefit of having the former  
21 directors removed by law and without the benefit of them  
22 really having the basis since the actual directors,  
23 myself, Mr. St. Clair, and Mr. Stock, removed.

24           The meeting held on September 16th was not  
25 legally viable. They voted themselves into a  
26 nonexistent legal entity. They did not employ the

1 actual name of the legal entity for the corporation.  
2 And they recognized that themselves. So, it is  
3 interesting to note that the paperwork that they  
4 represent as being valid from September 16th never was  
5 filed with the State of California because they knew  
6 they had made certain errors in how they went through  
7 that process and document process.

8 I have a copy of the actual restatement of  
9 articles that they did file with the State of  
10 California, which will establish a recognition on their  
11 part that they did not vote themselves into the correct  
12 and legal existing entity. They had to make that  
13 adjustment. They made the adjustment December 16th and  
14 filed those documents pursuant to the meeting on  
15 December 30th.

16 So, my challenge is timely because it is  
17 predicated on the fact that they had a corporate meeting  
18 or an attempt to conduct a corporate meeting on December  
19 16th, 2010, which was essentially a do-over because of  
20 their errors from September 16th, 2010.

21 THE COURT: Do you have some witnesses to  
22 present or testimony from yourself?

23 MR. COBB: I will present testimony primarily  
24 from myself. Again, I'm not well prepared today. I am  
25 not exactly sure if I would call upon these individuals  
26 here. Do I have to give that answer right now?

1 THE COURT: Well, no, but they should stay  
2 outside while you are testifying just because there is a  
3 general witness exclusion order in cases. So, you don't  
4 need to decide, but if there is a possibility they will  
5 be called as a witness, they need to be outside.

6 MR. COBB: Okay. Then I better protect myself.

7 THE COURT: Okay. So, I guess we will have you  
8 step on out.

9 THE COURT: Any witnesses who may be testifying  
10 should be waiting outside.

11 Mr. Cobb, do you wish to testify as yourself  
12 right now and tell me what's going on?

13 MR. COBB: Yeah. I mention --

14 THE COURT: We need to swear you in before you  
15 actually testify. So, please stand and raise your right  
16 hand.

17 (Plaintiff sworn.)

18 THE COURT: Mr. Rouse, enlighten me a little  
19 bit. What exactly has to be proved here by the  
20 plaintiff?

21 MR. ROUSE: Well, the plaintiff in his  
22 complaint essentially says he is challenging the  
23 validity of the appointments of Ernest Brede, Luis  
24 Contreras and Larry Laverdure as directors and officers  
25 in the Menlo Park Congregation of Jehovah's Witnesses.  
26 So, it would seem to me that he has to prove that these

1 people that he is challenging here are not the proper  
2 officers and directors in this church.

3           If it is -- if the case law structures two  
4 types of churches in the United States, there is only  
5 two types of churches talked about in case law,  
6 congregational churches and and hierarchal churches. A  
7 hierarchal church is governed by one set of first  
8 amendment laws, and congregational structured churches  
9 are governed by another set of case law that is  
10 applicable to them.

11           So, he is saying here Menlo Park Congregation  
12 of Jehovah's Witnesses. So, I think he needs to  
13 establish what law entitles him to get these men --  
14 challenge the appointment of these men, what law is  
15 going to govern here. Is it First Amendment going to  
16 govern or is it California Corporate Code going to  
17 govern? If California Corporate Code is going to be  
18 supreme, then maybe he has got a point. But if this is  
19 a hierarchal church, then this is governed by church  
20 law. Church law determines. Then I think he needs to  
21 evaluate that and disprove that.

22           THE COURT: I see in the file -- I don't see  
23 the outcome -- there was a summary judgment motion filed  
24 at some point.

25           MR. ROUSE: There was a federal case that they  
26 brought that is parallel to this and the motion was

1 filed in that and that was dismissed. A federal case  
2 ruled in our favor.

3 THE COURT: So, there's not been a summary  
4 judgment in this particular --

5 MR. ROUSE: Not in this one, but we wanted to  
6 benefit this Court with a ruling by a federal judge in  
7 this case. So, I mean, the same principles apply in  
8 that case as this.

9 THE COURT: All right, Mr. Cobb, why don't you  
10 go ahead and testify.

11 MR. COBB: The first statement is simply to  
12 create the base line. I have a letter from the Watch  
13 Tower Bible and Tract Society of New York, Incorporated,  
14 dated January 1st, 1980 to all congregations in the  
15 State of California.

16 I won't burden the Court by reading it. I am  
17 happy to reference it if you like, but essentially this  
18 letter was sent in anticipation of reformation of the  
19 Corporations Code for California.

20 MR. SMITH: Your Honor, he is referring to a  
21 document that he is reading into evidence. So, we have  
22 a hearsay objection. We perhaps have a foundational  
23 issue with regards to its admission. And so he is not  
24 testifying from his own personal knowledge. He is  
25 reading from a document.

26 THE COURT: That is hearsay, Mr. Cobb. So,

1 unless you have a way to authenticate it and get around  
2 the hearsay exception, I can't receive that as evidence  
3 now that there is an objection.

4 MR. COBB: Well, I can speak to it based on my  
5 knowledge. It is something that was furnished directly  
6 from the agency as stated. And it helps to establish  
7 the recognition of corporate law within the parameters  
8 of our activities engaging in our religious activity.

9 THE COURT: There is still the hearsay problem,  
10 Mr. Cobb. You are trying to prove the content of the  
11 document. That document would be hearsay. So, if I am  
12 to consider the substance of the documents there has to  
13 be a hearsay exception. And just because you are  
14 familiar with it, that's not a hearsay exception.

15 MR. COBB: Well, this is a letter that was  
16 maintained within the files of policy letters and  
17 directives and that was maintained at the congregation  
18 itself. It is a copy of a document maintained in the  
19 file and readily viewable with all pertinent information  
20 at that point in time from which it was sent. And we  
21 even have some subsequent actions were performed  
22 relative to what was being called for.

23 The significance of it is that there were  
24 changes to corporate law in California in 1980 that  
25 necessitated filing of statements of information. And  
26 this letter essentially is confirming our compliance

1 with that law.

2           Again, we have to maintain the distinction  
3 between when we talk about the Menlo Park Congregation  
4 of Jehovah's Witnesses, a religious agency, or if we are  
5 talking about Menlo Park Congregation of Jehovah's  
6 Witnesses Incorporated, a legal entity in the State of  
7 California.

8           So, the letter here establishes that state law  
9 is not subject to our religious views, but rather our  
10 religious views taking into consideration the laws of  
11 the land. And we are here is a discussion that we will  
12 comply with the corporate formalities and requirements.

13           THE COURT: When was that document made?

14           MR. COBB: January 1st -- when was it made?

15           THE COURT: Right.

16           MR. COBB: The date for the letter is January  
17 1st, 1980. This is a photocopy of the document. If  
18 given the opportunity, I can produce the original.

19           THE COURT: No. I will trust you. The problem  
20 is it still is a hearsay document. So, I will sustain  
21 the objection.

22           MR. COBB: Okay.

23           THE COURT: It's been improperly authenticated  
24 -- insufficiently authenticated.

25           Please, continue with your testimony.

26           MR. COBB: So, what we are referring to here is



1 that we have statements of information from 2008, also  
2 2010, that show positions of officers being maintained  
3 in the Menlo Park corporation.

4 Is it all right for me to refer to the Menlo  
5 Park corporation in short?

6 THE COURT: Okay.

7 MR. SMITH: Your Honor, same objection.  
8 Hearsay objection. He appears to be reading from a  
9 document and it has not been properly authenticated.

10 THE COURT: That is true. It hasn't been  
11 authenticated at this point. I will give you the chance  
12 to try to authenticate it.

13 That's unfortunately one of the draw backs of  
14 your being in pro per. You are not familiar with the  
15 Evidence Code which I am bound to follow. There are all  
16 these rules that can't be just waived away just because  
17 you represent yourself. So, unless you can properly  
18 authenticate that document, it is hearsay.

19 MR. COBB: Would you be willing to consider a  
20 short continuance so I can do that?

21 THE COURT: No. I'm not prepared to do that.  
22 That should have been done at the presiding judge this  
23 morning. We are here to hear the case. Mr. Rouse is  
24 already here from New York City. I am not going to make  
25 him come back.

26 MR. COBB: This is a document certified by

1 Deborah Bowling. It is a certified document from the  
2 Secretary of State.

3 THE COURT: Let me take a look at it.

4 I will allow this in because it is a certified  
5 government record.

6 Counsel, do you have an objection?

7 MR. SMITH: I haven't had a chance to see it.

8 THE COURT: Please approach.

9 MR. SMITH: Well, same objection. I don't  
10 think he met the hearsay exception.

11 THE COURT: That one is overruled. It's a  
12 government document.

13 You can refer to that, Mr. Cobb.

14 MR. SMITH: Do you have an extra copy of that?

15 MR. COBB: I don't know if I do. Give me one  
16 moment. I don't think I have an extra copy.

17 THE COURT: We will deal with it as best we  
18 can.

19 MR. COBB: I am willing to share it. I want to  
20 refer to it briefly.

21 Basically this is the statement of information  
22 form that is used in California. Very typical. It  
23 establishes that I was serving as a chief executive  
24 officer for the Menlo Park Congregation of Jehovah's  
25 Witnesses Incorporated.

26 We should enter into the record entity number

1 for the corporation is C0983980.

2 So, as of this filing, dated March 30th, 2010,  
3 I served as the CEO of the corporation. W. Arlen St.  
4 Clair served as secretary for the corporation. And  
5 George T. Stock served as the chief financial officer.

6 THE COURT: Could you spell his last name,  
7 please.

8 MR. COBB: S-T-O-C-K.

9 So, this is significant -- thank you for  
10 accepting it, Your Honor -- because whether they held a  
11 corporate meeting September 16th, 2010 or whether they  
12 held a corporate meeting December 16th, 2010, both of  
13 those meetings where they endeavored to appoint  
14 themselves as directors and then officers of the  
15 corporation, occurred within the tenure, the established  
16 tenure for myself, Mr. St. Clair and Mr. Stock.

17 So, in the absence of bylaws the term for any  
18 director is one year -- forgive me, I can't refer to the  
19 specific code on that. But I believe that is fairly  
20 common knowledge. In the absence of bylaws the term of  
21 any director is one year.

22 So, their initial attempt, which was erroneous  
23 in September 16th, was within the year, their follow-up  
24 attempt to make up for their errors was December 16th  
25 within the same year.

26 So, the only basis according to law for them to

1 proceed forward with appointments and so forth, is to  
2 formally remove the existing directors, which is  
3 something that can be done by a vote of the members at  
4 any time of their choosing. But that never occurred.  
5 The directors were never removed. They did not abandon  
6 the corporation. And they did not resign from their  
7 positions as directors of the corporation.

8           So, that is a prerequisite for any subsequent  
9 activities of the corporation and those formalities were  
10 never performed or satisfied.

11           So, the fundamental point that we have --

12           THE COURT: You said vote of --

13           MR. COBB: Section 5034 of the Corporations  
14 Code. I mentioned that within the first couple of pages  
15 of the complaint. Again, I apologize. I am not well  
16 prepared today. But I believe that it is section 5034  
17 that establishes a vote of members being required to  
18 execute such decisions and actions.

19           So, there would need to be a specific motion  
20 presented to the members that the existing directors,  
21 myself, Mr. St. Clair and Mr. Stock be removed from  
22 their standing positions as directors.

23           THE COURT: So, you are saying it has to be the  
24 members of the Menlo Park Congregation as opposed to the  
25 national organization?

26           MR. COBB: That is absolutely correct.

1 THE COURT: Okay. Anything else you want to  
2 tell me?

3 MR. COBB: Just that that never took place.  
4 That requirement was never satisfied. We have  
5 established that we held those positions as directors  
6 and we have established that the two meetings that they  
7 attempted to execute for voting purposes were within the  
8 one year tenure as established by law for each of the  
9 directors. So, they would have had to remove the  
10 existing directors as a prerequisite for any subsequent  
11 voting activity and they did not do so.

12 THE COURT: Okay.

13 Do you have any other witnesses you want to  
14 present or evidence before we hear from the other side.

15 MR. COBB: I can call -- yes. I would like to  
16 call Arlen St. Clair. And I would actually call John  
17 Cobb as well.

18 THE COURT: Who do you want to call first?

19 MR. COBB: I will call Arlen St. Clair first.

20 MR. ROUSE: Your Honor, if I may to the extent  
21 that he just testified we have a chance to cross examine  
22 him?

23 THE COURT: That's a great point. You have  
24 testified. So, you have to be cross examined.

25 So, Mr. Rouse, I will leave it to you.

26 CROSS EXAMINATION BY MR. ROUSE

1 MR. ROUSE: Thank you. May I see the document?

2 Q. Now, I am referring to -- I don't think it has  
3 been marked but --

4 THE COURT: Let's mark it as Plaintiff's 1.

5 MR. ROUSE: For the record I am referring to  
6 Plaintiff's 1 that has been handed to me by Mr. Cobb.

7 Q. Mr. Cobb, isn't it true that this document has  
8 a filed stamp date March 30th, 2010?

9 A. Correct.

10 Q. And at the time of March 30th, 2010 you  
11 occupied the position of an elder in the congregation in  
12 Menlo Park?

13 A. Correct.

14 Q., You occupied that position because a letter  
15 came to the congregation from who appointing you as an  
16 elder in the congregation?

17 A. A letter was sent from the Christian  
18 Congregation of Jehovah's Witnesses Incorporated,  
19 Patterson, New York.

20 Q. Yes. And from the time that letter was  
21 received through the date of this form, you still  
22 occupied that position as an elder; isn't that true?

23 A. True.

24 THE COURT: What was date that you were  
25 appointed?

26 MR. COBB: 2003.

1 MR. ROUSE: Q. And isn't it true that after  
2 this -- after you filed this letter with the Secretary  
3 of State on or about July the 1st, another letter came  
4 from the national headquarters in Patterson, New York  
5 removing you as an elder in the congregation; isn't that  
6 true?

7 A. Yes. Yes.

8 Q. Now, do you recognize this green book right  
9 here?

10 A. Yes.

11 Q. What's the name of this book?

12 A. Organized To Do Jehovah's Will.

13 Q. Isn't that the rule book of all 13,000  
14 congregations of Jehovah's Witnesses in the United  
15 States?

16 A. I am not sure I would call it a "rule book,"  
17 but generally speaking it provides direction for how to  
18 keep things organized.

19 Q. Doesn't the book say on the opening remarks  
20 that it is a direction, an organizational direction for  
21 the congregations in the United States; doesn't it say  
22 that?

23 A. It says that.

24 Q. You are familiar with it; aren't you?

25 A. I am.

26 Q. And the book also plainly states that unless

1 you are an appointed elder and ministerial servant in  
2 the congregation that you cannot occupy any other  
3 position unless you are permitted by the elders to do  
4 that; isn't that so?

5 A. Can you restate that, please?

6 Q. Doesn't the book say, that organizational book  
7 say -- well, let me strike that.

8 Let me put it like his: Who published this  
9 book? Do you know who published the book?

10 A. Published by Watch Tower Bible and Tract  
11 Society of Pennsylvania.

12 Q. Yes. Isn't this book used by all 13,000  
13 congregations in the United States as a guide for  
14 organizations?

15 A. It is.

16 Q. Didn't you at one time take an oath to be sub-  
17 missive to those organizational arrangements?

18 A. In being baptized I made a dedication of my  
19 life to do Jehovah's will.

20 Q. Didn't you take a vow to be submissive?  
21 Doesn't this book say you in fact took a vow to be  
22 submissive to those organizational arrangements?

23 A. That is a byproduct of my dedicating myself and  
24 my life to the doing of Jehovah's God's will.

25 Q. Doesn't it -- let me give you a copy of the  
26 book just so I make sure you understand. We might give



1 one to the judge, too.

2 THE COURT: Let's mark this as Defense A.

3 MR. ROUSE: Q. Doesn't it state, Mr. Cobb, on  
4 Page 121 of the book that an elder or -- I am quoting  
5 now on Page 121 if you want to look at it.

6 A. 121 the paragraph?

7 Q. Paragraph 2 in the middle of the paragraph  
8 doesn't it say, "An elder or a ministerial servant is  
9 usually assigned to see that necessary work is cared  
10 for." Does the book state that?

11 A. Are you confirming -- what chapter --

12 Q. I am talking about Page 121 where it talks  
13 about the Kingdom Hall.

14 A. So, that would be Chapter 11, "Arrangements for  
15 places of worship"?

16 Q. Yes.

17 A. It is my understanding this chapter is  
18 addressing matters of doctrinal belief, scriptural  
19 teachings and the role of the Kingdom Hall or church  
20 buildings in that overall arrangement; is that correct?

21 Q. Mr. Cobb, would you answer my question. It  
22 says here under section "Kingdom Hall" -- what is the  
23 Kingdom Hall?

24 A. Is this still Paragraph 2?

25 Q. Now I'm asking you the question: What is  
26 Kingdom Hall?