

No. S-NSW-856

NEW SOUTH WALES
Royal Commissions Act 1923
ROYAL COMMISSION INTO
INSTITUTIONAL RESPONSES TO CHILD SEXUAL ABUSE
SUMMONS TO PRODUCE

To: Terence O'Brien
Watchtower Bible and Tract Society Australia
12 - 14 Zouch Rd
Denham Court NSW 2565

Pursuant to section 8 of the *Royal Commissions Act 1923* (NSW), I, the Honourable Justice Peter David McClellan AM, Chair of the Royal Commission established under Letters Patent dated 25 January 2013 to inquire into and report on institutional responses to child sexual abuse, summon you to produce this Summons and the documents described in the Schedule to:

Tony Giugni, Solicitor Assisting
at Level 17, Governor Macquarie Tower, 1 Farrer Place, Sydney
on or before 7 March 2017 at 10 am.

SCHEDULE

1. All minutes of meetings of the Branch Committee since the commencement of the Royal Commission's public hearing into Case Study 29, i.e. since 27 June 2015.
2. All correspondence between the Branch Committee and the Governing Body and its committees and subcommittees concerning the response of the Jehovah's Witness organisation to the Royal Commission's public hearing into Case Study 29 and the report of Case Study 29 and any review of the policies and procedures that relate to child sexual abuse.

DEFINITIONS

For the purposes of this Summons:

1. the term '**child sexual abuse**' includes:

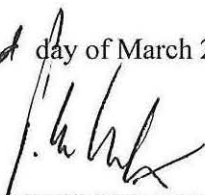
Any act which exposes a child to, or involves a child in, sexual processes beyond his or her understanding or contrary to accepted community standards. Sexually abusive behaviours can include the fondling of genitals, masturbation, oral sex, vaginal or anal penetration by a penis, finger or any other object, fondling of breasts, voyeurism, exhibitionism and exposing the child to or involving the child in pornography. It includes child grooming which refers to actions deliberately undertaken with the aim of befriending and establishing an emotional connection with a child, to lower the child's inhibitions in preparation for sexual activity with the child.

2. the term '**document**' includes:

- a. anything on which there is writing;
- b. anything on which there are marks, figures, symbols or perforations having a meaning for persons qualified to interpret them;
- c. anything from which sounds, images or writings can be reproduced with or without the aid of anything else;
- d. anything in hard copy or electronic copy stored in or on any form of media;
- e. a map, plan, drawing or photograph,

in the possession, custody or control of you or your organisation.

Dated this *3rd* day of March 2017



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The Honourable Justice Peter David McClellan AM
Chair of the Royal Commission

NOTES*1. Failure to comply with this Summons*

Failure, without reasonable excuse, to produce a document or other thing as required by a Summons issued under section 8 of the *Royal Commissions Act 1923* (NSW) is an offence punishable by a penalty of not more than four penalty units.

2. Production of documents or things by delivery or post

You may comply with this Summons by delivering or sending the documents or things sought by the Summons to the address specified in the Summons.

3. Electronic production of documents

You may comply with this Summons by emailing an electronic copy of the documents sought in the Summons to solicitor@childabuseroyalcommission.gov.au. Please specify the reference number of the Summons in the subject line of your email.