

Research Notes

Jehovah's Witnesses and Shunning

Massimo Introvigne

CESNUR (Center for Studies on New Religions)

maxintrovigne@gmail.com

ABSTRACT: Opponents of the Jehovah's Witnesses increasingly call for laws and court decisions that would declare their teaching and practice of "shunning" illegal. The Jehovah's Witnesses teach that their members in good standing should avoid communication, except in a limited number of cases, with ex-members who have been disfellowshipped after having committed serious offenses (and having not repented), or who have publicly disassociated themselves from the organization. "Shunning" does not apply to cohabiting relatives. The article discusses how "shunning" is practiced in other religions, what "shunning" as taught and practiced by the Jehovah's Witnesses is all about, why they practice it, and why in the author's opinion it is in fact not illegal. It should be protected by freedom of religion or belief, which should be granted to the Jehovah's Witnesses as well as to other groups with similar teachings and practices.

KEYWORDS: Jehovah's Witnesses, Shunning, Ostracism, Jehovah's Witnesses and Shunning, Opposition Against the Jehovah's Witnesses, Anti-Cult Movement.

Introduction

Campaigns against Jehovah's Witnesses seem to be on the rise internationally. In part, these campaigns are connected with propaganda of non-democratic states, including Russia, which have banned the Jehovah's Witnesses for their own purposes (Šorytė 2023), and need to justify actions that international institutions and several countries have condemned (International Religious Freedom or Belief Alliance 2021). In part, they are fueled by the anti-cult movement, which needs to justify its existence and the financial support it

receives from some governments by claiming that “the threat of the cults” is indeed dangerous and growing (USCIRF 2020).

One of the main arguments used against the Jehovah’s Witnesses is that they teach that their members in good standing should shun disfellowshipped ex-members, except if they are part of their immediate family and cohabit with them. It is claimed that shunning psychologically harms the “ostracized” ex-members and violates their human rights.

Although an overwhelming majority of the international court decisions dealing with this matter have concluded that teaching shunning is within the scope of the Jehovah’s Witnesses’ religious liberty, on March 16, 2021, the Court of Ghent, in Belgium, fined the Jehovah’s Witnesses for their practice of “ostracism” (Fautré 2021); and on January 26, 2022, the County Governor for Oslo and Viken, in Norway, issued an administrative decision denying to the Jehovah’s Witnesses the state subsidy for the year 2021 they should have received as they did for thirty years, finding some aspects of shunning objectionable (Introvigne 2022b). Both these decisions were appealed. On June 7, 2022, the Belgian decision was overturned by the Court of Appeal of Ghent, which concluded that shunning can be freely taught and practiced in Belgium (Introvigne 2022e) through a verdict confirmed by the Court of Cassation on December 19, 2023.

In this article, I will try to clarify how shunning is practiced in other religions, what shunning as taught and practiced by the Jehovah’s Witnesses is all about, why they practice it, and why in my opinion it does in fact fall within the scope of freedom of religion, which should be granted to the Jehovah’s Witnesses—and to everybody else.

Shunning: A Common Practice in Abrahamic Religions

One can find practices similar to shunning in some Buddhist schools and elsewhere in Asian religions, but shunning as practiced by the Jehovah’s Witnesses is a typical feature of the monotheistic religions called (not without discussions) “Abrahamic,” i.e., Judaism, Christianity, and Islam. To claim that it is a practice unique to the Jehovah’s Witnesses is just propaganda. While there are differences from other faiths in the way that Jehovah’s Witnesses implement

this concept, a brief review of shunning's religious roots will provide important context.

In *Deuteronomy* 13:6–16, Jews were taught that confronted with an apostate who had left the Jewish faith and propagates the worship of other gods, even if the apostate is “your very own brother, or your son or daughter, or the wife you love, or your closest friend,” “do not yield to them or listen to them. Show them no pity. Do not spare them or shield them” (all Biblical quotes from the New International Version). In some cases, the *Deuteronomy* taught, these persons might even be sentenced to death. Christians read in *1 Corinthians* 5:13, “Expel the wicked person from among you” and 5:11, “Do not even eat with such people;” and in *2 John* 10–11, “Do not take them into your house or welcome them. Anyone who welcomes them shares in their wicked work.”

Muhammad (ca. 570–632) was even more radical, according to a widely quoted hadith collected in the *Sahih al-Bukhari*, regarded as the most authoritative statement of Islam after the *Quran*: “If a Muslim denies his [sic] religion, kill him” (Schirrmacher 2020, 90).

These were not mere words. Executing apostates was not unheard of among the ancient Jews. When the Jews lost their political power and became a persecuted minority, the execution of the apostates was replaced by rituals and practices enacting their symbolic “death.” The community, including the close relatives, regarded the apostate as dead. The apostate was mentioned by using the language usually reserved for a deceased person. According to the entry on the *herem* (shunning) written by Haim Herman Cohn (1911–2002), a leading expert of Jewish law who became Israel's Minister of Justice and then a Supreme Court judge, in the authoritative *Encyclopedia Judaica*, an apostate

had to live in confinement with his family only, no outsider being allowed to come near him, eat and drink with him, greet him (...). After his death, his coffin would be stoned, if only symbolically by placing a single stone on it (Cohn 1996, 351),

which amounted to a symbolic execution. Even today, some ultra-Orthodox Jews maintain these practices.

In the *Corpus Juris Civilis* by the Roman Emperor Justinian I (482–565), which regulated all aspects of life in Catholic and Orthodox countries for several centuries, article I.7.3 of *Codex Justinianus* mandated that those excommunicated or who had left the faith “should be separated from association

with all other persons.” They could not make valid wills, nor inherit, and in several cases their properties would be confiscated by the state. Up until the 20th century, Catholic Canon Law regarded some categories of apostates as “vitandi,” in Latin “to be avoided,” and similar provisions still exist in some Eastern Orthodox Churches (Maksimovich 2008, 274–79).

There is perhaps no need to elaborate on Islam, where the passage from the death penalty for the apostates, still part of the law in several states, to a severe form of shunning, where it happens, is regarded as a significant progress by scholars of Islamic law and history such as David Cook, as apostates at least remain alive (Cook 2006).

These prescriptions had a reason. Scholars have explained that the early Abrahamic believers lived in a world where monotheism was the exception rather than the rule. The ancient Jews and Christians and the first Muslims were all surrounded by polytheists, whom they called “pagans” and who in turn regarded monotheism as irrational and bizarre. Monotheistic believers might have had polytheist relatives and friends. The Roman Empire exerted a strong pressure, including through persecution and executions, to bring monotheists back into the polytheistic folds. So did the “pagan” Meccans when confronted with the first Muslims.

Keeping the monotheistic faith was very difficult. It was at continuous risk of being submerged by the waves of a stronger and aggressive polytheism. Jews, Christians, and later Muslims had to adopt extraordinary measures to protect their struggling faiths. One was shunning the apostates, who would have otherwise added their voices and pressures to those of the “pagans,” with the catastrophic consequence of corrupting and destroying the young monotheistic religions (Cook 2006; Schirmacher 2020).

It is true that Christians and Muslims (although not the Jews) later gained political power. But they were still aware of the fragility of monotheism, and decided the provisions against the apostates should be maintained.

For several centuries, apostates were punished and isolated by the states, which is still the case in several Muslim countries. Within Christianity, while both Martin Luther (1483–1546) and John Calvin (1509–1564) still believed that protecting believers against apostates was a task of the state, slowly in modern times the idea of religious liberty emerged. In fact, this idea made the practice of

shunning not less but more, strict. Protestant groups advocating the separation of church and state maintained that apostates should not be punished by the state, which had no business in adjudicating religious controversies. They did not leave the apostates alone, however, but privatized the repression of apostasy. Since the state was asked to remain out of the picture, containing the danger represented by the apostates became the responsibility of individual believers, first among them the apostate's relatives and closer friends.

Those who know the simple life and old-fashioned antics of the Amish may also know that they keep a strict version of the *Meidung*, or shunning, as practiced by early Protestants. Few realize that *Meidung*, when it was introduced, was regarded as progress. The Amish fled to North America to affirm their right to religious liberty. As part of religious freedom, apostates were no longer executed, and physical violence against them was forbidden. They were free to go elsewhere and, if inclined to do so, establish new separate religious communities (Kraybill 1989, 115). The only sanction they were subjected to was *Meidung* or shunning, i.e., strict separation from their friends and relatives, which was perhaps sad but surely better than being burned at stake or drowned in the icy waters of the Limmat river, the penalty for apostates in Protestant Zurich (Gordon 2002, 215).

Today, most Christians regard appeals to the state for punishment or execution of the apostates as a thing of the past, or the mark of religions contrary to modern democratic ethos. That apostates if left unchecked, may undermine the faith of the believers, or destroy the religious communities, may be still acknowledged. But dealing with apostates is left to individuals and families rather than to the state.

The Jehovah's Witnesses would say that they practice shunning not for historical or sociological reasons but because the Bible teaches it, most notably in *1 Corinthians* 5:11 and 13 and *2 John* 10-11. Similarly, a devout Muslim would insist that the Islamic attitude on apostasy simply derives from divine revelation and the very words of Prophet Muhammad. These are internal attitudes, called "emic" in the language of social sciences, which should be acknowledged and respected. Scholars contribute a different point of view as outsiders, called "etic" (a technical term, not to be confused with "ethic"). This "etic" perspective does not replace the "emic" one. But it shows that there is nothing strange, irrational,

or unique in the position of the Jehovah's Witnesses about shunning, a practice that is part and parcel of the history of monotheism.

Jehovah's Witnesses: Who Is Disfellowshipped?

There are two categories of former Jehovah's Witnesses who may be subject to shunning. The first includes those who have been disfellowshipped. The second comprise those who have publicly disassociated themselves from the organization.

Before discussing shunning, it is therefore necessary to understand disfellowshipping, but first we should examine the case of those who voluntarily disassociate themselves. Opponents sometimes claim that it is unfair to treat in the same way those who have been disfellowshipped for serious sins and those who have simply left the Jehovah's Witnesses. However, this objection is based on a misunderstanding.

There is a large sociological literature on “non-practicing” or “lapsed” members of a religion. For instance, most of those who have been baptized as Roman Catholics are inactive, i.e., they rarely if ever attend Mass and other ceremonies, and regard themselves as “non-practicing” (for the Italian case, see Berzano 2023). In almost all countries with a Catholic majority, sociologists believe that there are now more “non-practicing” or “lapsed” Catholics than active Catholics. Only in Germany, before 2009 (when the Catholic Church changed its rules) it was comparatively common for lapsed Catholics to enter a formal declaration of “defection” in their parish's registers. They did so to avoid paying the church tax the German state collects for the benefit of the Catholic Church from those registered as Catholics.

With this very special exception, the overwhelming majority of lapsed Catholics do not formally disassociate themselves from the Catholic Church. Only a tiny minority of apostate ex-Catholics, who have turned into vociferous opponents of their former church, write strong-worded letters, or publicly declare their apostasy, or announce that they have joined another religion or become atheists. Under the prevalent interpretation of Catholic Canon Law, it can be argued that these militant apostates are *ipso facto* excommunicated, which is not the case for the lapsed Catholics.

The situation is the same among the Jehovah's Witnesses. As all large religious organizations, every year the Jehovah's Witnesses have a percentage of "lapsed" members who become in different ways inactive, just as they have a percentage of new members who join the organization. The Jehovah's Witnesses say of those who become inactive that "their faith has become weak." They no longer participate in congregational meetings, no longer preach to others, perhaps even drift away from their association with fellow believers. These "lapsed" or "weak" believers are not disfellowshipped nor shunned.

In contrast, those rarer apostate ex-members who have formally and publicly renounced their faith and disassociate themselves from the congregation either in writing or by action (e.g., by formally joining another religion, or a secular organization that according to the Jehovah's Witnesses "has objectives contrary to Bible teachings": *Organized to Do Jehovah's Will* 2021, 152) are considered as being in the same position as those who have been disfellowshipped. As mentioned earlier, this is by no means unique to the Jehovah's Witnesses. For example, according to the prevailing interpretation of Canon Law, the same situation exists in the Catholic Church.

Almost all religions have procedures for excommunicating or excluding members guilty of serious offenses from their fold. These offenses may be moral, such as adultery, systematic drunkenness, or theft, or religious, such as denying essential principles of the faith. Most religions, including the Jehovah's Witnesses, protect the privacy of the excluded members and do not publicly state the reasons for their exclusion. While this is laudable, and in some countries mandated by secular privacy laws, it allows for misrepresentation. Not surprisingly, ex-members who have been excluded for immorality or theft may not be willing to advertise their peccadillos, and may prefer to report that the reason for their exclusion was doctrinal disagreement. In fact, leading academic scholars of the Jehovah's Witnesses such as George Chryssides have observed that sexual immorality is the most frequent reason leading to being disfellowshipped (Chryssides 2021).

For the Jehovah's Witnesses, the notion of "unrepentant sin" is also important. The study edition of *The Watchtower* for October 2021, for example, specifies that "only unrepentant sinners are disfellowshipped" ("We Serve the God Who Is 'Rich in Mercy'" 2021, 11). Non-repentance is an essential factor in disfellowshipping.

It has repeatedly happened that disfellowshipped Jehovah's Witnesses have asked secular courts to reconsider the decisions of the organizations' judicial committees. They have consistently lost, with rare exceptions, such as a bizarre Norwegian decision in 2021 (Introvigne 2021b), which has been however overturned by the Norwegian Supreme Court in 2022 (Introvigne 2022d). However, these cases are in their own way useful, as they have produced a comprehensive assessment of the process leading to disfellowshipping by observers who are by definition neutral such as secular judges.

Courts of law have maintained that decisions of disfellowshipping or exclusion by a religious body are not justiciable, and are protected by the basic religious freedom principle that religions are free to self-organize themselves without interference from the states. In 2007, the Court of Appeals of Tennessee observed that the Jehovah's Witnesses

argue that the freedom of religious bodies to determine their own membership is such a fundamentally ecclesiastical matter that courts are prohibited from adjudicating disputes over membership or expulsion. We agree. Because religious bodies are free to establish their own guidelines for membership and a governance system to resolve disputes about membership without interference from civil authorities, decisions to exclude persons from membership are not reviewable by civil courts (Court of Appeals of Tennessee 2007).

In 2018, in the case *Judicial Committee of the Highwood Congregation of Jehovah's Witnesses and Highwood Congregation of Jehovah's Witnesses v. Randy Wall*, a unanimous Supreme Court of Canada reiterated that

secular judicial determinations of theological or religious disputes, or of contentious matters of religious doctrine, unjustifiably entangle the court in the affairs of religion (Supreme Court of Canada 2018, 768).

It added that "even the procedural rules of a particular religious group may involve the interpretation of religious doctrine," and concluded that "these types of [religious] procedural rules are also not justiciable" (Supreme Court of Canada 2018, 769).

Sociologists would agree, having been taught by Max Weber (1864–1920) that procedure in a religious organization is in itself theology (Weber 1968, 54–6). Among the Jehovah's Witnesses, procedural rules are rooted in religious belief rather than derived from secular law. Some terminology may sound court-like ("notice," "opportunity to be heard," "appeal") but the context is

undoubtedly religious: judicial meetings open with prayer and refer to Biblical principles. The unavoidable conclusion is that these rules and procedures are inherently religious.

While European courts have also generally ruled in favor of Jehovah's Witnesses in disfellowshipping cases, there is a nuance with respect to North American decisions. Italian courts, for example, have repeatedly commented that, while secular judges cannot compel ecclesiastical courts to adopt the same rules of national or European tribunals, because they cannot interfere with how religions decide to organize themselves, nonetheless they can examine whether judicial committees did follow their own rules, and whether in some form the right of the defendant to be heard, which is a basic human right, was granted to the person who had been disfellowshipped. Courts in Bari (in 2004 and 2007: Tribunale di Bari 2004, 2007), in Rome (2021: Introvigne 2021b), and in Teramo (2022: Introvigne 2022c) have concluded that the judicial committees do apply the rules set forth by the Jehovah's Witnesses, and these rules grant the defendants the right to be heard and defend themselves.

Additionally, after a decision disfellowshipping them, the defendants are allowed to appeal. In this case, as explained in chapter 14, no. 26, of the internal manual *Organized to Do Jehovah's Will*,

the body of elders will contact the circuit overseer, who will select qualified elders [normally from a different congregation] to serve on an appeal committee to rehear the case (*Organized to Do Jehovah's Will* 2021, 151).

All Jehovah's Witnesses' "publishers" have a copy of this book, and it is easily available in print and electronic format.

What offenses are ground for disfellowshipping, on the other hand, is a theological question on which secular judges cannot interfere, as the High Court of England and Wales, Queen's Bench Division, confirmed on June 7, 2019 (High Court of Justice, Queen's Bench Division 2019; the decision was upheld by the Court of Appeal in London, Queen's Bench Division, on March 17, 2020: Court of Appeal [London], Queen's Bench Division 2020).

While what offenses are so serious that they should lead to disfellowshipping is a matter that the Jehovah's Witnesses are free to determine themselves, it is important to note that, notwithstanding anecdotes apostate ex-members like to report (and which should always be verified without accepting them at face value),

disfellowshipping does not happen for minor mistakes but for unrepentant serious moral sins, or for publicly denying doctrines the Jehovah's Witnesses regard as essential. Some in our liberal modern societies may regard excommunication or disfellowshipping as generally unacceptable, but they exist in all religions, not to mention political parties, trade unions, and other secular organizations.

In these cases courts, including the European Court of Human Rights, have repeatedly ruled that freedom of speech and religious liberty of those excluded are not violated. If they disagree with the moral and theological standards of their religion, their individual liberty is protected by the fact that nobody prevents them from leaving it and join or establish a religious organization with entirely different practices and beliefs.

It should be added that, like other religions that practice forms of excommunication or exclusion, the Jehovah's Witnesses believe that the function of disfellowshipping is more medicinal than punitive. It is an open offer to the disfellowshipped persons to amend their ways and repent. In fact, many do. As the study edition of the official magazine *The Watchtower* stated in October 2021,

Is disfellowshipping really an expression of mercy? Yes, it is. To withhold discipline from someone who needs it is not wise, merciful, or loving. (Prov. 13:24) Can getting disfellowshipped help an unrepentant sinner change his course? It can. Many who have fallen into serious sin have found that the firm action the elders took gave them the very jolt they needed to come to their senses, change their course of action, and return to Jehovah's warm embrace ("We Serve the God Who Is 'Rich in Mercy'" 2021, 10).

Scholars who have studied the Jehovah's Witnesses have all met members who had been disfellowshipped and had later returned to their congregation. This is evidence that claims about the medicinal role of disfellowshipping are not merely rhetorical. Jehovah's Witnesses make genuine efforts to put these teachings into practice. Their efforts are often successful.

Jehovah's Witnesses' Shunning in Practice

What is shunning? Media often rely on accounts of apostate ex-members. As I have explained elsewhere, not all ex-members of a religion become "apostates" and in fact most don't. Scholars of religion use "apostates" as a technical term designating those ex-members who become militant opponents of the religion

they have left. Since they joined an oppositional coalition whose aim is to criticize and, if possible, destroy their former religion, their accounts, while not deprived of interest, are obviously biased. Sociologists have often described them as “atrocious tales,” whose first aim is to be used as weapons to hit the religion they have left (Introvigne 2022a).

Mainline scholars of new religious movements do not believe that everything an apostate reports is by definition false. Apostate accounts should be considered and studied. But certainly not everything the apostates state is true, and using them as the sole source on a religion would only lead to biased if not caricatural assessments.

This is also true when considering accounts of shunning. As one of the leading academic scholars of the Jehovah's Witnesses, George Chryssides, has observed, sometimes apostate ex-members and self-appointed “experts on cults” who rely on their accounts tell stories about shunning that range from the “unlikely” to the “absurd” (Chryssides 2021).

What happens, in reality? In the case of former Jehovah's Witnesses who have been disfellowshipped or have disassociated themselves, a sober announcement is made in the midweek meeting of their congregation that “X is no longer one of Jehovah's Witnesses.”

Some of the apostate “atrocious tales” mentioned by Chryssides pretend that in this case the disfellowshipped ex-member is

ordered out of the family home with only a few belongings such as an old van and no money for petrol, and [has] to sleep under a bridge as a consequence (Chryssides 2021).

This would perhaps make for a dramatic script for a movie but is not true.

In FAQ published on the Witnesses official website, jw.org, we read:

What of a man who is disfellowshipped but whose wife and children are still Jehovah's Witnesses? The religious ties he had with his family change, but blood ties remain. The marriage relationship and normal family affections and dealings continue (Christian Congregation of Jehovah's Witnesses 2023).

In the 2008 book *Keep Yourselves in God's Love*, also published by the Jehovah's Witnesses, we read:

Since... being disfellowshipped does not sever the family ties, normal day-to-day family activities and dealings may continue. Yet, by his [sic] course, the individual has chosen to break the spiritual bond between him and his believing family. So loyal family members

can no longer have spiritual fellowship with him. For example, if the disfellowshipped one is present, he would not participate when the family gets together for family worship (Christian Congregation of Jehovah's Witnesses 2008a, 208).

On April 15, 1991, *The Watchtower* stated that,

If in a Christian's household there is a disfellowshipped relative, that one would still be part of the normal, day-to-day household dealings and activities ("Imitate God's Mercy Today" 1991, 22).

This is not a new development. On August 1, 1974, *The Watchtower* had already explained that,

Since blood and marital relationships are not dissolved by a congregational disfellowshipping action, the situation within the family circle requires special consideration. A woman whose husband is disfellowshipped is not released from the Scriptural requirement to respect his husbandly headship over her; only death or Scriptural divorce from a husband results in such release. (Rom. 7:1–3; Mark 10:11, 12) A husband likewise is not released from loving his wife as "one flesh" with him even though she should be disfellowshipped (Matt. 19:5, 6; Eph. 5:28–31) ("Maintaining a Balanced Viewpoint Toward Disfellowshipped [sic] Ones" 1974, 470).

On April 15, 1988, the Watchtower stated again that,

A man who is disfellowshipped or who disassociates himself may still live at home with his Christian wife and faithful children. Respect for God's judgments and the congregation's action will move the wife and children to recognize that by his course, he altered the spiritual bond that existed between them. Yet, since his being disfellowshipped does not end their blood ties or marriage relationship, normal family affections and dealings can continue ("Discipline That Can Yield Peaceable Fruit" 1988, 28).

Sensational apostate accounts sometimes report cases where, notwithstanding these clear provisions, disfellowshipped spouses or adult children have been compelled to leave the family home by their relatives.

However, upon further investigation, it came out that these incidents do not refer to disagreements about religion but to abusive individuals whose habits of violence, drunkenness, or outrageous or deliberately provocative behavior made cohabitation with their family members impossible and even dangerous. Some of them had been disfellowshipped precisely for their violent behavior but they conveniently "forget" to include this detail in their stories. In these cases, the abusive person would be thrown out of the family home by relatives of all religions, and courts of law would not object.

This is not to say that shunning is not taken seriously by the Jehovah's Witnesses. It does extend to non-cohabiting relatives. The same April 15, 1988, issue of *The Watchtower* explained that, as opposite to the case of cohabiting relatives,

The situation is different if the disfellowshipped or disassociated one is a relative living outside the immediate family circle and home. It might be possible to have almost no contact at all with the relative. Even if there were some family matters requiring contact, this certainly would be kept to a minimum ("Discipline That Can Yield Peaceable Fruit" 1988, 28).

The same is true in the case of business relations with disfellowshipped or disassociated ex-members. Jehovah's Witnesses are not asked to sever these relations but are counseled to limit them to interaction and discussions about work, avoiding in particular any conversation about religion. Egregiously disrespecting these indications may be in itself cause for judicial action, and the Jehovah's Witnesses would refer to what *2 John:11* has to say about the apostates: "Anyone who welcomes them shares in their wicked work."

As Chryssides commented, "disfellowshipping is not meant to foster callousness" (Chryssides 2021). He cites an example from *The Watchtower* of a disfellowshipped woman whose car had a flat tire. In this case, congregation members were counseled to help her, and told that refusing to assist her "would be needlessly unkind and inhumane," and would show "a lack of balance" in understanding the principle of shunning ("Maintaining a Balanced Viewpoint Toward Disfellowshipped [sic] Ones" 1974, 467). This is even more true in the case of seriously sick or ageing disfellowshipped relatives in need of assistance. The Jehovah's Witnesses teach that shunning does not eliminate their relatives' duty to assist them.

This shows the difference between shunning as practiced by the Jehovah's Witnesses and the "social death" practiced by some radical ultra-Orthodox Jewish groups. The expression "social death" was coined by early 20th century scholars of Judaism to designate this version of *herem* among ultra-Orthodox Jews (Cohn 1996). Using it with reference to the Jehovah's Witnesses is baseless, and is used by apostates and anti-cultists just to impress the media and their readers.

Jehovah's Witnesses recognize that shunning is painful. For example, in the study edition of *The Watchtower* for October 2017, they comment that it is "despite our pain of heart" that

we must avoid normal contact with a disfellowshipped [non-cohabiting] family member by telephone, text messages, letters, e-mails, or social media (“The Truth Brings, ‘Not Peace, But a Sword’” 2017, 16).

The pain, on the other hand, does not affect only the disfellowshipped ex-members. Although anti-cult and apostate accounts do not mention it, scholars who have interviewed Jehovah’s Witnesses in good standing (rather than apostates only) are aware of how painful it is for one of them to have a relative or close friend who has been disfellowshipped.

There may be pain for the fact of shunning, which the Jehovah’s Witnesses regard as a duty mandated by the Bible, and there may be additional pain due to the reasons of the shunning, for example when an abusive husband has been disfellowshipped for brazenly beating his wife or unrepentantly cheating on her.

As mentioned earlier, for the Jehovah’s Witnesses, shunning comes from clear indications in the Bible, particularly in *1 Corinthians* 5:9–13 and *2 John* 9–11, and was practiced by Christians in the first centuries. They do not believe it would be right to change or disregard these biblical precepts.

However, they also believe that the Bible cannot teach anything harmful, and the divine plan is a plan of love. As painful as it is, shunning has the aim not only of protecting the believers but also of causing the sinners to come to their senses and repent. Unless these visits are refused, elders may visit disfellowshipped members to offer their counsel hoping they will repent and return.

Even opponents acknowledge that a large percentage of disfellowshipped ex-Jehovah’s Witnesses are eventually reinstated. They speculate that they ask for reinstatement only to avoid shunning, not because they are persuaded by the doctrines and practices of the Jehovah’s Witnesses. I wonder how opponents can know that this is the case. Ultimately, this is a philosophical question as old as humanity. Do disfellowshipped Jehovah’s Witnesses repent out of a sincere conversion or just to avoid the consequences of disfellowshipping? Do we respect the laws because we are good citizens or just to avoid punishment? Who can know for sure?

Minors and Shunning

Opponents of the Jehovah’s Witnesses often tell stories where members of the organization are disfellowshipped and shunned all of a sudden. Then, they reveal

features of the Jehovah's Witnesses that allegedly had been carefully hidden before. What looked like a loving and caring community now appears harsh and disciplinarian. Horrific stories are included of "children" that are disfellowshipped and then shunned by parents and siblings in their own homes. These stories are not true, although there are rare cases of minors who are disfellowshipped (but certainly not shunned at home).

Apostates and anti-cultists have their own agenda, but the reality is often quite different. Those who join the Jehovah's Witnesses know beforehand that if they unrepentantly commit serious offenses they risk being disfellowshipped. They know that shunning is a consequence of disfellowshipping. By no means is this part of the internal rules hidden from potential converts. This article itself has explained how shunning works by quoting publications of the Jehovah's Witnesses publicly available on the official website jw.org, which those who consider joining the organization are encouraged to access.

One does not become a Jehovah's Witness overnight. While some new religions and movements have been accused of accepting new members after they have attended one meeting only, or even after a short interaction with a minister at a street stall, these accusations would not be valid if directed at the Jehovah's Witnesses. On the contrary, they warn against rushing to be baptized, although when one is ready baptism should not be delayed either. We read for example in *The Watchtower*, study edition, for March 2018, that before candidates

can get baptized, they must learn the truth about God, his purpose for humans and the earth, and what he did to save mankind. (1 Timothy 2:3-6) Then they need to develop faith, which will help them to obey God's laws and to stop doing what he hates. (Acts 3:19) This is important, because Jehovah will not accept the dedication of a person who keeps doing things that He hates. (1 Corinthians 6:9, 10) But there is more. Those who want to dedicate their life to Jehovah need to attend congregation meetings and regularly preach the good news and teach others. This is required of anyone who wants to follow Christ. (Acts 1:8) ("Baptism—A Requirement for Christians" 2018, 6).

In practice, this means that before requesting baptism, candidates would have become "unbaptized publishers," meaning that they were already participating in the public ministry for which Jehovah's Witnesses are known and presenting their doctrines to others. Even before being accepted to participate with the congregation as "unbaptized publishers," some assurance would need to be given by the individual that they understand, agree with, and are living according to basic Bible principles. When candidates seek baptism, they normally go through

two one-hour sessions with the congregation's elders, a sort of assessment where the elders make sure that those who ask to be baptized understand both the teachings and the practices of the Jehovah's Witnesses. Only if the elders are satisfied that this is the case are the candidates baptized. What sins are considered serious, the possibility that unrepentant sinners will be disfellowshipped, and the consequent shunning, are among the basic teachings that candidates to baptism should know and understand.

Opponents have objected that, while this is true for those who join the Jehovah's Witnesses as adults, it is not true for "children" who are born within the organization. This objection may impress audiences in countries where the majority Christian churches practice infant baptism, also called pedobaptism, i.e., baptize children as soon as possible after they are born. This is the case for Roman Catholics, Eastern Orthodox, and several Protestants, with the exclusion of the denominations issued from the so-called "Radical Reformation" (which was often "anabaptist," meaning "without [infant] baptism"), Baptists, and some Pentecostals.

Since in many countries the majority of Christians regard infant baptism as a matter of course, they may not know or consider that Jehovah's Witnesses do not practice it. Jehovah's Witnesses are part of these minority Christian groups believing that those who practice pedobaptism misinterpret the Bible. On October 1, 2011, for example, *The Watchtower* discussed the issue, insisted that "Jesus did not teach that infants should be baptized," and observed that

those who are baptized must be disciples of Jesus. That is, they are individuals who have learned about Jesus and have chosen to follow him—a choice that no infant, of course, can make ("Should Infants Be Baptized?" 2011, 11).

There are dozens of other texts where the Jehovah's Witnesses present their criticism of infant baptism.

Being born in a Jehovah's Witnesses' household, thus, does not mean that one is automatically regarded as a Jehovah's Witnesses. Sons and daughters of Jehovah's Witnesses parents who want to join the organization (not all do) follow the same path of every other candidate to baptism. *The Watchtower*, in its study edition of July 1, 2006, addressed itself directly to children of Jehovah's Witnesses parents:

So you young ones should understand that neither your parents nor the Christian elders in the congregation are going to force you to get baptized. The desire to serve Jehovah must come from you (“Youths, Make It Your Choice to Serve Jehovah” 2006, 28).

Critics contend that they have occasionally met children as young as 10 who have been baptized. In my and other scholars’ observation of the Jehovah’s Witnesses this is not unheard of, but is comparatively rare. In modern societies, young people achieve maturity at different ages due to diverse circumstances prevailing in different areas of the world. The Jehovah’s Witnesses acknowledge this. *The Watchtower*, study edition, March 2018, stated that,

Of course, each child is unique; not all children become mature at the same rate or at the same point in life. Some have a good measure of mental and emotional maturity at a young age and express a desire to get baptized. Others may not be ready for baptism until they are a bit older. Thus, discerning parents do not pressure their children to get baptized (“Parents, Are You Helping Your Child Progress to Baptism?” 2018, 9).

The 2008 book *Questions Young People Ask—Answers That Work, Volume 2* addresses the question “Is there a certain age by which you should be baptized?” and answers as follows: “Age is not the primary factor. Still, you should be old enough—and mature enough—to understand the meaning of dedication” (Christian Congregation of Jehovah’s Witnesses 2008b, 307).

Contrary to what critics argue, that a minor may be mature enough to make choices implying important consequences is not a theory unique to the Jehovah’s Witnesses. In some countries, including the United States, England, and Wales, minors can be tried as adults in criminal courts for serious charges such as homicide and sexual assault, if the courts believe that their cognitive and moral capabilities were developed enough at the time of the crime.

The Roman Catholic Church practices infant baptism and does not require an understanding of the faith as a pre-requisite for being baptized, but it canonizes those who performed heroic moral and religious deeds as saints. Dozens of minors have been canonized, even outside the special situation of martyrdom. As reported by the daily newspaper of the Italian Catholic Bishops, in 1981 the Vatican Congregation for the Causes of Saints indicated that at age 7 some minors may consciously decide whether to accept or reject God’s plan for them, and as a consequence may be considered for canonization (Maccioni 2019). If they can be regarded as mature enough to be tried as adults for serious crimes or, at the other extreme of human possibilities, canonized for their virtuous deeds,

surely “some” minors can also be baptized as mature believers in Christian organizations such as the Jehovah’s Witnesses that do not practice pedobaptism.

Opponents also insist on the sad situation of minors disfellowshipped and shunned. Just as minors who commit crimes are tried by secular authorities, if not as adults then in juvenile courts, many religions have provisions that minors guilty of serious offenses can be excluded from the community. Among the Jehovah’s Witnesses the possibility also exists that a minor is disfellowshipped, but these cases are rare.

A controversy has recently erupted in Norway where, as mentioned earlier, the County Governor for Oslo and Viken, following a letter from two apostate ex-members and an anonymous critic, issued an administrative decision denying to the Jehovah’s Witnesses the state subsidy for the year 2021, based on their practice of shunning. In their appeal against the decision, the Jehovah’s Witnesses noted that in the last five years in Norway only one minor had been disfellowshipped, at the age of 17. Clearly calling a 17-year-old “a child” may have a propaganda value but is not correct. One of the apostate ex-members in turn answered that he had “received some information” about five cases of minors disfellowshipped in Norway (when exactly is unclear), but “they do not want to be identified,” so we only have his word for them (Introvigne 2022b).

Yes, minors can be disfellowshipped but no, it does not happen often. If they are disfellowshipped, they are certainly not shunned by their parents and siblings at home. In fact, they are not even excluded from home Bible study activities, although understandably they will no longer serve as “publishers” and preach the faith of the Jehovah’s Witnesses to others. On November 15, 1988, *The Watchtower* instructed that parents who have a disfellowshipped daughter or son “are still responsible for their child, though he [sic] is disqualified as an unbaptized publisher.”

Just as they will continue to provide him with food, clothing, and shelter, they need to instruct and discipline him in line with God’s Word. (Proverbs 6:20-22; 29:17) Loving parents may thus arrange to have a home Bible study with him, even if he is disfellowshipped. Maybe he will derive the most corrective benefit from their studying with him alone. Or they may decide that he can continue to share in the family study arrangement. Though he has gone astray, they want to see him return to Jehovah, as did the prodigal son in Jesus’ illustration (“Helping Others to Worship God” 1988, 20).

Is Shunning "Illegal"?

Is shunning against secular laws? As mentioned earlier, two controversial non-final decisions, which were both appealed, answered this question in the affirmative. The first was rendered by the Court of Ghent, in Belgium, which on March 16, 2021, fined the Jehovah's Witnesses for their practice of shunning (Fautré 2021). On June 7, 2022, it was overturned by the Court of Appeal of Ghent, which concluded that shunning can be freely taught and practiced in Belgium (Introvigne 2022e) through a verdict confirmed by the Court of Cassation on December 19, 2023. In the second, the County Governor for Oslo and Viken, in Norway, on January 26, 2022, issued an administrative decision denying to the Jehovah's Witnesses the state subsidy for the year 2021 they should have received as they did for the previous thirty years, again on the basis of some aspects of shunning (Introvigne 2022b).

Rather than the rule, these recent decisions are exceptions rendered by lower courts and authorities. There is a solid corpus of weighty international decisions stating that the teaching and practice of shunning is protected by freedom of religion, to which the Jehovah's Witnesses are as entitled as anybody else.

The first substantial discussion of the practice was included in the 1987 decision of the United States Court of Appeals for the Ninth Circuit *Paul v. Watchtower Bible and Tract Society of New York, Inc.* The court acknowledged that the plaintiff had experienced some unpleasant incidents in being "shunned" by close friends who were Jehovah's Witnesses after she was disfellowshipped. Nonetheless, the court maintained that,

Shunning is a practice engaged in by Jehovah's Witnesses pursuant to their interpretation of canonical text, and we are not free to reinterpret that text... a state tort law prohibition against shunning would directly restrict the free exercise of the Jehovah's Witnesses' religious faith (United States Court of Appeal, Ninth Circuit 1987).

In 2003, the Court of Appeal of Warsaw, in Poland, similarly concluded that

a court is not authorized to verify attitudes of members of any religion regarding principles accepted by that denomination as well as to judge sanctions imposed on an individual who encroached those principles... This also applies to the following by its members of the obligation concerning a certain conduct toward expelled members (Court of Appeal of Warsaw 2003).

In 2005 the Hungarian Supreme Court observed that

the state shall not interfere in internal matters of the church... therefore the religious beliefs and decisions of the church concerning ethical matters shall not be subjects of jurisdiction of the state or the court (Supreme Court of Hungary 2005),

and this includes the public announcement in a congregational meeting that a former Jehovah's Witness has been disfellowshipped and its consequences.

In 2007, the Court of Appeals of Tennessee observed that,

The doctrines of the Jehovah's Witnesses and their reading of scripture require that their members ostracize individuals who have been disfellowshipped. While there is no question that this practice has resulted in a painful experience for the Andersons [the plaintiffs in the case], the law does not provide a remedy for such harm. For example, in other contexts, family members sometimes become estranged from each other for various reasons on their own volition, and the law does not recognize a basis for suit for the pain caused by such estrangement. Courts are not empowered to force any individual to associate with anyone else... Shunning is a part of the Jehovah's Witnesses belief system. Individuals who choose to join the Church voluntarily accept the governance of the Church and subject themselves to being shunned if they are disfellowshipped (Court of Appeal of Tennessee 2007).

In 2012, the Administrative Court of Berlin examined a complaint by a disfellowshipped Jehovah's Witness against the public announcement in a congregational meeting of the measure against him, since "members of the association should have no social contact with disfellowshipped persons," and it would become impossible for him to "to have a picnic, celebrate, do sports, go shopping, go to the theatre, have a meal at home or in a restaurant" with friends who remained in the Jehovah's Witnesses. The court denied the request, commenting that the Jehovah's Witnesses' policy on these matters "is not subject to state authority" and is protected by "freedom of religion, the separation of Church and state, and the right of religious associations to self-determination" (Administrative Court of Berlin 2012).

The Italian Supreme Court (Cassazione) in 2017 ruled that the so called "ostracism" is also protected by the principle of non-interference. The decision observed that in this case "ostracism" is "a refusal to associate" with the disfellowshipped ex-member, and "no law requires a person to behave in the opposite manner." In fact, "no discrimination took place." Even if one would argue that refusing to associate with disfellowshipped members violate "good manners and civilized behavior," this would not "constitute a justiciable crime or civil tort." Individuals, and even a whole "category," have a right to decide to

“break off or interrupt personal relations,” and courts have no business in telling them otherwise (Corte di Cassazione 2017). Mentioning the 2017 Supreme Court decision, the Court of Rome on May 23, 2021, also stated that teaching and practicing shunning is not illegal (Introvigne 2021a).

On April 9, 2020, the Niigata District Court in Japan answered an ex-Jehovah's Witness who had asked the judges to rule that disfellowshipping and shunning are illegal, that these practices are

deeply related to the content of religious doctrine and faith, and it is impossible to judge their validity or lack thereof unless one steps into the content of said doctrine and faith (Niigata District Court 2020),

which is prohibited by constitutional principles.

In Belgium itself, before the Ghent decision of 2021, the Court of Appeal of Mons on January 10, 2012, dismissed the charge of discrimination in a case of shunning, ruling that Jehovah's Witnesses have a right to determine their own internal rules. On November 5, 2018, the Brussels Court of Appeals confirmed that a religious congregation is free to suggest its own standards of behavior to its members, and that individual congregants have the right to decide to restrict their association with a former congregant. On February 7, 2019, the Court of Cassation confirmed the decision (decisions in the archives of the author).

These decisions consistently regard shunning as a practice protected by freedom of religion and of association, based on two different arguments. The first is that secular courts of law cannot interfere on how religious organizations decide to self-regulate themselves and discipline their internal matters, a principle that has also been consistently affirmed by the European Court of Human Rights (see e.g., European Court of Human Rights [Grand Chamber] 2013). Practices such as shunning are inherently religious, and judging them would involve a judgment on theology and biblical interpretation. In the case of *Jehovah's Witnesses of Moscow v. Russia* (2010), the European Court of Human Rights confirmed that Jehovah's Witnesses are a “known religion” and stated that “it is a common feature of many religions that they determine doctrinal standards of behavior by which their followers must abide in their private lives” (European Court of Human Rights 2010; see also the decision *Taganrog LRO and Others v. Russia*, European Court of Human Rights 2022).

The second argument is that courts cannot force citizens to associate with others, be they relatives or former friends, with whom, for whatever reason, they have decided they no longer want to associate. This principle goes even beyond religious freedom and enters the most intimate sphere of personal liberty. Critics of shunning quote psychological studies concluding that those shunned suffer, in varying degrees, serious emotional harm. Some of these studies show the anti-cult prejudices of their authors, but this is not even crucial. That estrangement from relatives or former friends cause some emotional and psychological harm is somewhat obvious. However, this is not unique to shunning for religious reasons, is a frequent phenomenon in our society, and is not an area where courts of law can dictate a different behavior (Introvigne and Richardson 2023).

Sociologists who study family relationships know that family estrangement is a growing social problem. In an ideal world, divorced ex-spouses should maintain a civilized relationship with each other. Adult children should continue to maintain a relationship with their parents, even when they believe the education they received from them could have been different or better. Of course, family estrangement is unavoidable when a spouse or children have suffered violence and abuse. Unfortunately, however, estrangement is becoming widespread even in cases where disagreements did not derive from such dramatic causes.

Religious disagreements are only one subcategory among many causes leading to estrangement. Family members or former friends may seriously quarrel about politics, money, and even sport, and stop talking to each other. In case of divorce, a spouse who feels wronged by the other may decide to permanently shun the ex-husband or wife.

These are personal decisions courts of law cannot interfere with. A family court may order a husband to pay alimony to his ex-wife, but it cannot order the two of them to keep meeting and being friends. Similarly, a court of law cannot compel Jehovah's Witnesses to keep associating with those who have left the faith or have committed what they regard as serious sins. In short, no external authority can compel human beings to associate with somebody they do not, or no longer, like.

Opponents of the Jehovah's Witnesses may answer that they do not ask the courts to compel individual devotees to associate with disfellowshipped ex-members (although sometimes one has the impression that this is precisely what is requested from the judges). They want courts to rule, they say, that the Jehovah's Witnesses as an organization should be prohibited from teaching

shunning. This is even more problematic, however. Many religions have similar teachings, yet one does not hear often that those orthodox Jews who do so should be prevented from teaching *herem* or Muslims from commenting about Prophet Muhammad's hadiths about apostasy.

Few would deny that some form of shunning was taught, as mentioned earlier, by the authors of *1 Corinthians* 5:13 (“Expel the wicked person from among you”) and 5:11 (“Do not even eat with such people”), and *2 John* 10–11 (“Do not take them into your house or welcome them. Anyone who welcomes them shares in their wicked work”). Some can argue that these passages are historically conditioned and should be regarded as teaching precepts no longer in force. Others may offer a different interpretation of the same biblical passages. But it should be obvious that in a democratic society affirming religious liberty how believers interpret the Bible and teach based on these interpretations is a matter that can be debated among theologians but cannot be decided by the police officer or the judge.

References

- Administrative Court of Berlin. 2012. “Case VG 27 K 79.10.” Decision of December 11.
- “Baptism—A Requirement for Christians.” 2018. *The Watchtower*, Study Edition, March:3–8.
- Berzano, Luigi. 2023. *Senza più la domenica. Viaggio nella spiritualità secolarizzata*. Cantalupa (Torino): Effatà.
- Christian Congregation of Jehovah's Witnesses. 2008a. “*Keep Yourselves in God's Love*.” Wallkill, NY: Watch Tower Bible and Tract Society of New York, Inc.
- Christian Congregation of Jehovah's Witnesses. 2008b. *Questions Young People Ask—Answers That Work, Volume 2*. Wallkill, NY: Watch Tower Bible and Tract Society of New York, Inc.
- Christian Congregation of Jehovah's Witnesses. 2023 [last updated]. “Do Jehovah's Witnesses Shun Those Who Used to Belong to Their Religion?” (Frequently Asked Questions). Accessed December 17, 2023. <https://bit.ly/3RNB7ca>.

- Chryssides, George. 2021. "Jehovah's Witnesses: Disfellowshipping, Shunning, and the Ghent Ruling." *Bitter Winter*, April 20. Accessed December 17, 2023. <https://bit.ly/47bdCP7>.
- Cohn, Haim Hermann. 1996. "Herem." In *Encyclopedia Judaica*, corrected edition, 18 vol., vol. 8, 344–55. Jerusalem: Keter.
- Cook, David. 2006. "Apostasy from Islam: A Historical Perspective." *Jerusalem Studies in Arabic and Islam* 31:248–88.
- Corte di Cassazione. 2017. *F.L. v. Congregazione Cristiana dei Testimoni di Geova*. April 13, no. 9561. Accessed December 17, 2023. <https://bit.ly/3gShJVm>.
- Court of Appeal [London], Queen's Bench Division. 2020. *Otuo v. Morley and Watch Tower Bible and Tract Society of Britain*. March 17, case no. A2/2019/1645.
- Court of Appeal of Tennessee. 2007. *Barbara J. Anderson et al. v. Watchtower Bible and Tract Society of New York, Inc., et al.* January 19. Case no. M2004-01066-COA-R9-CV. Accessed December 17, 2023. <https://bit.ly/2GnkmSM>.
- Court of Appeal of Warsaw. 2003. "Case VI A CA 81/03." Fourth Civil Section, August 13.
- "Discipline That Can Yield Peaceable Fruit." 1988. *The Watchtower* April 15:26–31.
- European Court of Human Rights. 2010. *Jehovah's Witnesses of Moscow and Others v. Russia*. June 10. Accessed December 17, 2023. <https://bit.ly/47b8sTb>.
- European Court of Human Rights [Grand Chamber]. 2013. *Sindicatul "Păstorul cel bun" v. Romania*. July 9. Accessed December 17, 2023. <https://bit.ly/3hRs8ST>.
- European Court of Human Rights. 2022. *Taganrog LRO and Others v. Russia*. June 7. Accessed December 17, 2023. <https://bit.ly/496QT8q>.
- Fautré, Willy. 2021. "The Ghent Case Against the Jehovah's Witnesses: A Chronology." *Bitter Winter*, April 12. Accessed December 17, 2023. <https://bit.ly/4ancD0t>.
- Gordon, Bruce. 2002. *The Swiss Reformation*. Manchester and New York: Manchester University Press.
- "Helping Others to Worship God." 1988. *The Watchtower* November 15:15–20.
- High Court of Justice, Queen's Bench Division. 2019. *Otuo v. Morley and Watch Tower Bible and Tract Society of Britain*. June 7. [2019] EWHC 1349 (QB).

- “Imitate God’s Mercy Today.” 1991. *The Watchtower* April 15:20–5.
- International Religious Freedom or Belief Alliance. 2021. “Statement on Jehovah’s Witnesses.” December 17. Accessed December 17, 2023. <https://bit.ly/483nZVM>.
- Introvigne, Massimo. 2021a. “Court of Rome: Jehovah’s Witnesses ‘Ostracism’ Is Not Illegal.” *Bitter Winter*, July 6. Accessed December 12, 2023. <https://bit.ly/3GNTY0j>.
- Introvigne, Massimo. 2021b. “Jehovah’s Witnesses: A Strange Norwegian Decision.” *Bitter Winter*, August 6. <https://bit.ly/41rhCsR>.
- Introvigne, Massimo. 2022a. “Are Apostates Reliable?” Series of five articles. Accessed December 17, 2023. *Bitter Winter*, January 10, <https://bit.ly/3SDlItN>; January 11, <https://bit.ly/3SFHLiV>; January 12, <https://bit.ly/3AcQ4LN>; January 13, <https://bit.ly/3AgnauA>; and January 14, <https://bit.ly/3dnzKii>.
- Introvigne, Massimo. 2022b. “Norway: An Unfair Decision Against the Jehovah’s Witnesses.” *Bitter Winter*, February 2. Accessed December 17, 2023. <https://bit.ly/3tlWUxY>.
- Introvigne, Massimo. 2022c. “Disfellowshipping and ‘Ostracism’: Italian Court Sides with the Jehovah’s Witnesses.” *Bitter Winter*, April 8. Accessed December 17, 2023. <https://bit.ly/3tpmfXZ>.
- Introvigne, Massimo. 2022d. “Jehovah’s Witnesses in Norway: The Supreme Court Corrects a Mistake.” *Bitter Winter*, May 13. Accessed December 17, 2023. <https://bit.ly/3RnZpYN>.
- Introvigne, Massimo. 2022e. “Ghent Decision Overturned on Appeal: Jehovah’s Witnesses’ Shunning Can Be Freely Taught and Practiced in Belgium.” *Bitter Winter*, June 20. Accessed December 17, 2023. <https://bit.ly/3Qc5zun>.
- Introvigne, Massimo, and James T. Richardson. 2023. “Why New Proposals to Criminalize Jehovah’s Witnesses’ ‘Shunning’ Are Wrong: A Response to Grendele, Flax, and Bapir-Tardy.” *The Journal of CESNUR* 7(6):61–9. DOI: 10.26338/tjoc.2023.7.6.5.
- Kraybill, Donald B. 1989. *The Riddle of Amish Culture*. Baltimore, MD: Johns Hopkins University Press.
- Maccioni, Riccardo. 2019. “Perché ci sono pochi bambini santi.” *Avvenire*, August 22. Accessed December 17, 2023. <https://bit.ly/4asYkr9>.
- “Maintaining a Balanced Viewpoint Toward Disfellowshipped [sic] Ones.” 1974. *The Watchtower* August 1:466–73.
- Maksimovich, Kirill Alexandrovich. 2008. “АНАФЕМА” (Anathema). In *ПРАВОСЛАВНАЯ ЭНЦИКЛОПЕДИЯ* (Orthodox Encyclopedia), 54 vol., vol. 2 (revised ed.), 274–79. Moscow: Церковно-научный центр

- «Православная энциклопедия» (Church Research Center “Orthodox Encyclopedia”).
- Niigata District Court. 2020. “Case 2018 [Wa] 71.” Decision of April 9.
- Organized to Do Jehovah’s Will*. 2021. Warwick, NY: Watch Tower Bible and Tract Society of Pennsylvania.
- “Parents, Are You Helping Your Child Progress to Baptism?” 2018. *The Watchtower*, Study Edition, March:8–12.
- Schirmacher, Christine. 2020. “Leaving Islam.” In *Handbook of Leaving Religion*, edited by Daniel Enstedt, Göran Larsson, and Teemu T. Mantsinen, 81–95. Leiden: Brill.
- “Should Infants Be Baptized?” 2011. *The Watchtower* October 1:11.
- Šorytė, Rosita. 2023. “The War in Ukraine and Russian Conspiracy Theories About the Jehovah’s Witnesses.” *The Journal of CESNUR* 7(4): 54–62. DOI: 10.26338/tjoc.2023.7.4.4.
- Supreme Court of Canada. 2018. *Judicial Committee of the Highwood Congregation of Jehovah’s Witnesses and Highwood Congregation of Jehovah’s Witnesses v. Randy Wall*. SCC 26, [2018] 1 S.C.R. 750–71. Accessed December 17, 2023. <https://bit.ly/3jvOHge>.
- Supreme Court of Hungary. 2005. *Lorincz v. Jehovah’s Witnesses in Hungary*. Decision of August 29.
- “The Truth Brings, ‘Not Peace, But a Sword.’” 2017. *The Watchtower*, Study Edition, October:12–6.
- Tribunale di Bari. 2004. *Congregazione Cristiana dei Testimoni di Geova v. Vito Pucci* [order]. December 6/December 14. Accessed December 17, 2023. <https://bit.ly/3v1EuDb>.
- Tribunale di Bari. 2007. *Vito Pucci v. Congregazione Cristiana dei Testimoni di Geova e altri*. February 20. Accessed December 17, 2023. <https://bit.ly/3GPWAe9>.
- United States Court of Appeal, Ninth Circuit. 1987. *Paul v. Watchtower Bible and Tract Soc. of New York, Inc.* 819 F.2d 875 (1987).
- USCIRF (United States Commission on International Religious Freedom). 2020. “The Anti-Cult Movement and Religious Regulation in Russia and the Former Soviet Union.” Accessed December 17, 2023. <https://bit.ly/3D9Ewtc>.
- “We Serve the God Who Is ‘Rich in Mercy.’” 2021. *The Watchtower*, Study Edition, October:8–13.
- Weber, Max. 1968. *Economy and Society: An Outline of Interpretive Sociology*, edited by Guenther Roth and Claus Wittich. New York: Bedminster Press.

“Youths, Make It Your Choice to Serve Jehovah.” 2006. *The Watchtower*, Study Edition, July 1:26–30.