

*Tracy Caekaert and Camillia Mapley v
Watchtower Bible and Tract Society of New York, Inc.*

*Shirley Gibson
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Min-U-Script® with Word Index

Exhibit C

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1 **that?**
 2 A. No, I did other things. I didn't do that
 3 kind of stuff, no. I helped with brick work.
 4 Just all kinds of things. Mainly cooking.
 5 **Q. I see. Okay. So there would be a -- a**
 6 **mobilization, of sorts, of -- of members --**
 7 A. Lots of them at that time.
 8 **Q. I see.**
 9 A. It's done differently now --
 10 **Q. Okay.**
 11 A. -- but, yes.
 12 **Q. But we're back in 1970 -- between 1975,**
 13 **1980, for instance. There would be a mobilization**
 14 **of members to build a -- build a Kingdom Hall**
 15 **somewhere. Is that right?**
 16 A. Right.
 17 **Q. And then everybody would kind of play a**
 18 **role in getting that done?**
 19 A. Yes. We did it in three days.
 20 **Q. Wow. Okay.**
 21 **Do you remember where you did that?**
 22 A. We did one in Hardin, one in Laurel, one
 23 in Columbus, one in Casper, one in Cody. There
 24 was one other -- Oh, there was another one in
 25 Wyoming. I can't remember.

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1 **Q. Okay. Would Bruce go with you?**
 2 A. Yes. He was a carpenter.
 3 **Q. Yeah. I'm -- I -- I'm -- kind of want to**
 4 **learn a little bit more -- as much as I can,**
 5 **anyway, about your volunteer work. Other things**
 6 **you did as a volunteer besides assist with these**
 7 **Kingdom Hall builds?**
 8 A. Well, I didn't really do a lot. I just
 9 helped out wherever I was needed.
 10 **Q. Sure. And was that typical for members**
 11 **to do that?**
 12 A. Yes. The ones that could travel and go
 13 places, yes, at that time, yes.
 14 **Q. Sure. Okay.**
 15 **So in this affidavit here, Exhibit 5,**
 16 **when you say that you became an active volunteer**
 17 **doing service work, and then the next sentence you**
 18 **mention that you divorced Bruce in 2001, and you**
 19 **say you're currently an active member of the**
 20 **church and you continue to do volunteer service**
 21 **work, that's what you're talking about.**
 22 A. Yes.
 23 **Q. Preaching, assisting where you can.**
 24 A. Yeah.
 25 **Q. When there's mobilizations of members of**

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1 **the congregation.**
 2 A. Yes.
 3 **Q. Do you attend church? Is it Sundays?**
 4 A. We have meetings on Thursday night and
 5 Sunday.
 6 **Q. Okay. And do you do any sort of**
 7 **volunteer work during those services?**
 8 A. No.
 9 **Q. Okay. How many different congregations**
 10 **or Kingdom Halls do you think you've kind of done**
 11 **that kind of service work with that you've**
 12 **described? Hardin for sure, right?**
 13 A. I'm -- I'm sorry, I don't -- I don't know
 14 what you mean. Do you mean building -- helping
 15 build the Kingdom Halls?
 16 **Q. Or -- Or preach, you know, work, go door**
 17 **to door and preach.**
 18 A. Well, everywhere I've went --
 19 **Q. Okay.**
 20 A. -- I've done it.
 21 **Q. Yeah. Let me make sure I've got a full**
 22 **list of that. We've got Hardin; Laurel; Heppner;**
 23 **Canoga Park; Jackson, Wyoming.**
 24 A. (Nods head.)
 25 **Q. Livingston, Wickenburg.**

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1 A. (Nods head.)
 2 **Q. And then Helena.**
 3 A. Yes.
 4 **Q. Which -- Which Kingdom Hall is in Helena?**
 5 A. I'm in Canyon Ferry congregation.
 6 **Q. Okay. And have you been a member of**
 7 **other congregations in Helena?**
 8 A. No.
 9 **Q. Just that one?**
 10 A. Just that one.
 11 **Q. Okay. And is that the full list of the**
 12 **congregations where you've served as a member?**
 13 A. All the -- All those places that I've
 14 been.
 15 **Q. Yeah.**
 16 A. In Helena, this is the only one, yeah.
 17 **Q. Okay. All right.**
 18 **Let's talk about paragraph 3 of your**
 19 **affidavit. The first sentence you state that**
 20 **Bruce, Sr. was a pedophile who started molesting**
 21 **Tracy when she was four. And then you say [As**
 22 **Read]: "This came out in 1977 when we learned that**
 23 **another Ministerial Servant in the Hardin**
 24 **congregation, Gunner Hain, had sexually molested**
 25 **Tracy at his home."**

1 A. Yes.
 2 **Q. Why do you say 1977? You fairly -- How**
 3 **do you feel about that number, that year? Pretty**
 4 **certain about that?**
 5 A. Yes.
 6 **Q. Tell me why.**
 7 A. Because it was brought to my attention
 8 all this stuff had happened, and I --
 9 **Q. How -- How was it brought your attention?**
 10 A. Well, because of Gunner Hain, it came
 11 out. He was reprov'd, but they didn't do anything
 12 to Bruce 'cause he -- Anyway. I was told what had
 13 happened, and then Bruce admitted he had too,
 14 so -- but they didn't do anything with Bruce but
 15 they did something -- they -- Gunner Hain was
 16 reprov'd is all.
 17 **Q. Who told you that?**
 18 A. Harold Rimby.
 19 **Q. And so when you say this came out in**
 20 **1977, that -- that -- Harold Rimby told you**
 21 **personally --**
 22 A. Yes.
 23 **Q. -- about Gunner Hain.**
 24 A. And my ex-husband.
 25 **Q. And your ex-husband molesting Gunner's**

1 **opposed to 1978?**
 2 A. Because it was the year after we were
 3 baptized.
 4 **Q. Okay. So you feel -- you're certain**
 5 **about that number, 1977.**
 6 A. (Nods head.)
 7 **Q. Yeah. Where were you when you had this**
 8 **conversation with Mr. Rimby?**
 9 A. In our home at Fort Smith.
 10 **Q. Who else was there?**
 11 A. My ex-husband.
 12 **Q. So just the three of you?**
 13 A. Yeah. Well, my children were there, too.
 14 **Q. Okay. And had Mr. Rimby announced he was**
 15 **going to come over to have this conversation with**
 16 **you or did he just show up, or how'd that happen?**
 17 A. I guess just showed up. I don't
 18 remember. We didn't make announcements; we just
 19 came --
 20 **Q. Okay.**
 21 A. -- to each other's homes.
 22 **Q. I take it it was a surprise. It was**
 23 **shocking.**
 24 A. Yes.
 25 **Q. Is that fair?**

1 **stepdaughter. Gunner had molested his**
 2 **stepdaughter and Tracy.**
 3 A. (Nods head.)
 4 **Q. How did Mr. Rimby know that?**
 5 **MR. SWEENEY:** Objection. Speculation.
 6 A. Do I still answer?
 7 **BY MR. SHAFFER:**
 8 **Q. Yeah, go ahead. Yeah.**
 9 A. Well, because Gunner told Harold.
 10 **Q. And then Harold told you.**
 11 A. Yes.
 12 **Q. Okay. Sounds like Harold told you about**
 13 **Gunner. Did -- In -- In the same conversation he**
 14 **told you that Bruce had done the same thing?**
 15 A. Yes.
 16 **Q. And do you know how Harold knew**
 17 **that -- that Bruce had molested Tracy?**
 18 **MR. SWEENEY:** Objection. Speculation.
 19 **BY MR. SHAFFER:**
 20 **Q. Go ahead. It's okay.**
 21 A. Well, Bruce admitted to Harold that he
 22 had.
 23 **Q. Okay. And then Harold told you.**
 24 A. Yes.
 25 **Q. Okay. In 1977 -- Why do you say 1977 as**

1 A. And the first thing I said was "We need
 2 to call the authorities."
 3 And Harold said, "I'll take care of it."
 4 **Q. Okay.**
 5 A. So I assumed he would, but he didn't.
 6 **Q. Okay.**
 7 A. I mean, maybe he did. He didn't call the
 8 authorities, though. And that was my mistake.
 9 **Q. Was Harold an elder at that point?**
 10 A. Yes.
 11 **Q. And you're new to the church at that**
 12 **point in time.**
 13 A. Yes.
 14 **Q. You understood that if Harold -- Harold**
 15 **was essentially directing how to take care of this**
 16 **situation. Is that right?**
 17 A. Yes.
 18 **Q. And would there be a consequence to you**
 19 **as a member if you did -- if you disobeyed**
 20 **Mr. Rimby's command to not tell the authorities?**
 21 A. No, there wouldn't have been a problem.
 22 I just assumed he was going to do it. He said he
 23 was.
 24 **Q. He said he was going to tell the**
 25 **authorities or he was going to handle it?**