

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

TRACY CAEKAERT, and
CAMILLIA MAPLEY,

Case No.
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY, SR.,

VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION
OF JAMES ROWLAND

Defendants.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Cause No.
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., and
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA,

Defendants.

James Rowland

1 A. Yes.

2 Q. Okay. And during those phone calls, were
3 you just honestly and truthfully telling
4 Mr. Bontecou what you knew and what had happened?

5 A. Yes.

6 Q. Okay.

7 A. It was a brief kind of a summary.

8 Q. Okay. And is it possible that based on
9 those conversations with Mr. Bontecou, that he
10 prepared this affidavit?

11 A. Yeah, it -- I think that I did. Maybe
12 Ariane. Mr. Bontecou wanted it, and I prepared it
13 and had it notarized and everything.

14 Q. And I assume that you reviewed it before
15 you signed it. Looks like you signed it on --
16 well, just a little over a year ago, April 14th,
17 2020.

18 A. Uh-huh.

19 Q. Did you look at it carefully before you
20 signed it?

21 A. Did I -- yeah.

22 Q. And is everything here accurate to the
23 best of your memory?

24 A. To the best of my memory.

25 Q. Yeah, okay. So if we look at paragraph 3,¹⁵⁰

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1 it says around 1974 you first started hearing
2 rumors that Gunner Haines, who was a member of the
3 congregation, was sexually abusing girls.

4 What do you mean when you say you heard
5 rumors? What did you hear?

6 A. I heard that from my family that Gunner
7 had games that he played with them.

8 Q. Okay.

9 A. And it was hide-and-seek. And when he'd
10 find whoever, he'd molest them.

11 Q. And how sure are you in this 1974 date
12 you've got here on paragraph 3?

13 A. Yeah, I'd start hearing different things
14 about then, but it could have even been a little
15 later than that.

16 Q. Okay.

17 A. And '74 was a date that I was appointed as
18 an elder, and people started coming and telling me
19 things, you know.

20 Q. I see.

21 A. Because they trusted me, I guess.

22 Q. Yeah. Okay.

23 A. And I don't know if they went to any of
24 the -- any other elders, but they would tell me,
25 and then on the occasion where I have written up

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1 their -- at elders' meetings, I would bring this
2 up, and it didn't go anywhere.

3 Q. You say on paragraph 3 -- and I think
4 everybody understands, just so you know, that it's
5 so long ago that we're not going to hold you to
6 specific dates, you know, right? It could be '75
7 perhaps. Who knows.

8 A. Right.

9 Q. You say here again on paragraph 3 that you
10 brought the subject up with the elders. What you
11 heard about Gunner Haines, you brought that up with
12 the elders sometime around 1974.

13 A. Uh-huh.

14 Q. Does that seem right to you as you sit
15 here today? Does that seem accurate?

16 A. Seemed pretty accurate.

17 Q. And what did you tell the elders,
18 specifically, if you can recall, at that time in
19 1974?

20 A. What did I tell the elders?

21 Q. What did you tell them?

22 A. It was probably sometime after that. And
23 I knew Ariane wasn't lying to me. And when she
24 told me about that, we discontinued going there to
25 their house and discontinued any babysitting

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