

Exhibit B

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., et al,

Defendants,

ARIANE ROWLAND, and
JAMIE SCHULZE,

DEPOSITION UPON ORAL
EXAMINATION OF CARLA
(HAIN) KLESSENS

Plaintiff,

vs.

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

Case No.
CV-20-59-BLG-SPW

Defendants.

BE IT REMEMBERED, that the deposition upon oral examination of CARLA (HAIN) KLESSENS, appearing at the instance of the Plaintiffs, was taken at the offices of Fisher Court Reporting, 2711 1st Avenue North, Billings, Montana, on Thursday, January 11, 2024, beginning at the hour of 9:05 a.m., pursuant to the Federal Rules of Civil Procedure, before Barbara J. McLean, Registered Merit Reporter, Certified Realtime Reporter, and Notary Public.

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Carla (Hain) Klessens

1 Q. And what about, do you know Jamie and
2 Ariane Rowland?

3 A. I do. We spent time with them too. Their
4 brother had cancer. He died when he was 16, Jeremy
5 did. It was -- they were all like family, you
6 know.

7 My mom taught us kids how to dance, and we
8 would move furniture in the house, and she just
9 tried to always have things for us kids to do, keep
10 us busy. So, I don't know, they were like family.
11 At least that's the way I saw them.

12 Q. Did you ever hear any accusations of abuse
13 involving Jamie or Ariane?

14 A. I didn't.

15 Q. Did you ever learn of any sexual abuse
16 involving Gunnar Hain of children?

17 A. Yes.

18 Q. And how did you come to learn of that?

19 A. Because I was one of them.

20 Q. Do you know when Gunnar Hain started
21 abusing you?

22 A. Somewhere between the time he and my mom
23 got married and when I was four, I told my mom. I
24 was sitting on her lap, learning to tie a bow, and
25 told her that -- what he was doing. They called

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1 the Elders. Went from there.

2 Q. Okay. I'm going to kind of just unpack
3 that in little pieces if that's okay.

4 A. Go ahead.

5 Q. Okay. So you remember telling your mom
6 that Gunnar Hain was sexually abusing you when you
7 were about four years old?

8 A. Yeah.

9 Q. That would make that 19 --

10 A. '76.

11 Q. -- '76.

12 A. Yeah.

13 Q. And you said you were learning to tie a
14 bow. Can you tell me why that sticks out to you?

15 A. Because I was sitting on her lap, and we
16 were talking, and I told her. Because Gunnar got
17 upset when I told her, because of course she was
18 upset, and it was one of those -- there was a good
19 fight because of it, and he went and stayed with
20 Martin and Millie Svensen. Mom talked to the
21 Elders. Gunnar was an Elder at that point the best
22 that I can remember.

23 They made him be a ministerial servant,
24 and he stayed gone for a couple weeks, I think.
25 They told my mom she couldn't divorce him.

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1 He swore he wouldn't touch us kids again,
2 because I didn't know he was touching my sister.
3 He said he wasn't going to touch us no more. And
4 in order to get me to be quiet, he started killing
5 my animals.

6 Q. Okay. There's a lot in there, and so I'm
7 going to just keep asking questions if that's okay
8 and kind of try and unpack all of that.

9 So I heard you say that Gunnar left the
10 house after you let your mom know that he was
11 sexually abusing you?

12 A. Yeah, she wanted him out of the house away
13 from us girls.

14 Q. Who all was still living in the house at
15 that point?

16 A. All three of us girls were living there
17 with mom. No, it would have been just me and
18 Rhonda. Jolene wasn't born yet.

19 Q. Okay. And my understanding from what
20 you've just said is that you told your mom, and
21 your mom either called the Elders or went to the
22 Elders?

23 A. Yeah, she called them. They came over to
24 the house.

25 Q. Okay.

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1 A. I remember them coming there, because like
2 I said, Gunnar was not happy. He was very upset
3 with me.

4 Q. Do you remember what Elders came to the
5 house?

6 A. Martin, Harold Rimby -- I don't remember
7 who else was there at that time.

8 Q. Okay. And Martin --

9 A. Martin and Harold were the ones that my
10 mom usually called when there were issues or when
11 there was things going on. That was just who she
12 went to.

13 Q. Okay. And is that Martin Svensen?

14 A. Yeah.

15 Q. Okay. And I also heard you say that
16 they -- it sounds like -- did your mom want a
17 divorce?

18 A. Yeah, she wanted him gone. They told her
19 that she couldn't divorce him. Gunnar was blind,
20 so it was kind of like they played -- you know,
21 he -- they played on her as far as I'm concerned.
22 But, yeah, he went and stayed with the Svensens for
23 a while. Mom didn't talk to him for a couple days.
24 We still went to meetings and everything, but --

25 Q. And when you say they told your mom that

Carla (Hain) Klessens

1 she could not get a divorce from Gunnar, do you
2 mean the Elders that came to your house?

3 A. Yeah.

4 Q. Do you have an understanding as to why
5 they wouldn't allow your mother to get a divorce?

6 A. Part of me thinks that they didn't believe
7 anything was going on. Part of me thinks that they
8 just wanted to make light of it, like it wasn't a
9 big deal, like -- like it should have been
10 something that everybody could get over and brush
11 it away and it would go away.

12 Q. Do you know if there was any sort of
13 investigation done? Was there a judicial
14 committee?

15 A. I know they met with Gunnar a couple
16 times. He had just became an Elder. They had just
17 made him an Elder. They made the announcement at
18 meeting that he was going to be a ministerial
19 servant again.

20 I know there was a lot -- he would go over
21 and meet with the Elders whether it was at the
22 Kingdom Hall or they would go to Martin's. We
23 weren't there for it, but I know he had a couple
24 meetings that he had to go to, because even when he
25 came home, he still had to go, like, do a Bible

15

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1 study with them.

2 Q. So it sounds like Gunnar held some sort of
3 position, and after you reported to your mother,
4 who then reported it to the Elders, he was removed
5 from that position?

6 A. Correct.

7 Q. And they made some sort of announcement
8 within the congregation?

9 A. Yeah.

10 Q. Do you remember if they specified why he
11 was being removed?

12 A. I don't.

13 Q. How long did Gunnar stay out of the house
14 after you told your mother that he was sexually
15 abusing you?

16 A. Maybe two or three weeks. Probably more
17 so, because it was an inconvenience for everybody
18 else to have to take care of him or help him would
19 be my opinion.

20 Q. I also heard you say that Gunnar killed
21 some of your animals?

22 A. Oh, yeah.

23 Q. Can you tell me about that?

24 A. My kitten, he killed and put it in my
25 playhouse. Told me that I didn't need to be