

Exhibit C

Tracy Caekaert

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

TRACY CAEKAERT and
CAMILLIA MAPLEY,
Plaintiffs, Case No. CV-20-00052-SPW-TJC

vs.

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

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

Cross-Claimants,

vs.

BRUCE MAPLEY SR.,
Cross-Defendant.

Tracy Caekaert

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VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION OF
TRACY CAEKAERT

BE IT REMEMBERED, that the
videoconference/videotaped deposition upon oral
examination of Tracy Caekaert, appearing at the
instance of the Defendant Watch Tower Bible and
Tract Society of Pennsylvania, was taken at 211
North Higgins, Suite 303, Missoula, Montana, on
Friday, February 9, 2023, beginning at the hour of
9:11 a.m., pursuant to the Federal Rules of Civil
Procedure, before Mary R. Sullivan, Registered
Merit Reporter, Certified Realtime Reporter, and
Notary Public.

Tracy Caekaert

1 A. I'm disfellowshipped.

2 Q. Anything else?

3 A. No.

4 Q. Did you ever talk to Shirley about the
5 sexual abuse that you're alleging against
6 Bruce, Sr.?

7 A. Yes.

8 Q. When?

9 A. After it happened --

10 Q. Can you --

11 A. -- with Gunner.

12 Q. After it happened with Gunner. Is that
13 what you said?

14 A. Mm-hmm. That's the first that I was made
15 to tell her what had happened.

16 Q. Okay. How old were you?

17 A. Ten. Nine. Somewhere between nine and
18 ten.

19 Q. And who made you tell her?

20 A. Bruce Mapley, Sr.

21 Q. We'll talk about that more here in a
22 minute, but other than that instance when you were
23 ten or so, have you talked to Shirley about these
24 allegations at any other time?

25 A. No.

Tracy Caekaert

1 Q. And when you were ten and you told her,
2 did you tell her about both Bruce, Sr. and Gunner?

3 A. No, I was only made to tell her about
4 Gunner.

5 Q. And at that same time did Cami also tell
6 her?

7 A. No.

8 Q. Why did Bruce, Sr. make you tell Shirley
9 about the -- Gunner?

10 MR. SHAFFER: Object to form.

11 A. The night that Gunner sexually molested
12 me, not long after that, he called Bruce, Sr. to
13 tell him what he had just done to me. My father
14 came and picked me up from the home, Gunner Hain's
15 home, and in the car my father asked me if Gunner
16 had done something to me, and he made me tell him
17 what Gunner had done to me.

18 BY MR. SWEENEY:

19 Q. And that was immediately after it was
20 done?

21 A. Within a few hours.

22 Q. And then in relation to that, when did you
23 tell Shirley?

24 A. My father made me repeat the story all
25 the way from Hardin to Fort Smith, took me up in

Tracy Caekaert

1 Q. Okay. So let's walk through this so I
2 understand how this works timeline. Did all of
3 this happen in the same afternoon, that you told
4 Shirley about Gunner and that Bruce confessed about
5 what he did to you?

6 A. My best recollection is yes.

7 Q. Okay. And it started out -- correct me if
8 I'm wrong -- but it started out with you and
9 Shirley and Bruce, Sr. in a room, and you telling
10 Shirley about what Gunner had done to you.

11 A. Yes.

12 Q. Okay. And then what happened after that
13 that led to Bruce, Sr. confessing what he had done?

14 A. I don't know what initiated him to then
15 confess that to my mother. I have no idea what
16 -- I don't really know what spurred that on.

17 Q. You were in the room when he confessed
18 that to your mother?

19 A. Yes.

20 Q. And how did Cami and Bruce, Jr. end up in
21 the room?

22 A. I don't know. He brought us all into the
23 room.

24 Q. Okay. What did Bruce, Sr. say to your
25 mother?

Tracy Caekaert

1 A. He -- He was crying. He put his
2 hands -- his head into his hands, and he had huge
3 tears dropping, and he just said, "I've been
4 molesting Tracy for years."

5 Q. Okay. Did he say the same thing about
6 your sister Cami?

7 A. Not that I recall of.

8 Q. Okay. And what was your mother's
9 reaction?

10 A. My mother had a very stern look on her
11 face. You know, it's kind of hard as a kid to be
12 able to tell you exactly how I remember my mother,
13 but I remember when I told her about what Gunner
14 had done. I don't think I remember looking at my
15 mom when Bruce was confessing because I was so
16 focused on these huge tears that were coming out
17 of my father, I'd never seen my father cry, but
18 when I had to tell Shirley about Gunner, her face
19 looked -- I don't have a better term than to say
20 maybe grief stricken or shocked. She never said
21 anything, but her face was -- you could tell she
22 was not -- she was unhappy.

23 Q. Did -- Did Shirley say anything?

24 A. No.

25 Q. How long did this meeting last, this