

***Exhibit O***

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

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

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

Plaintiffs,

vs.

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

Defendants,

DEPOSITION UPON ORAL  
EXAMINATION OF YOLANDA  
FRASER

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

Plaintiff,

vs.

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

Defendants.

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**Yolanda Fraser**

1 wasn't awake. And me trying to comfort her, you  
2 know.

3 And when she was finally able to let me  
4 know, she said that her brother -- that he would  
5 rape her, her brothers, her two younger brothers,  
6 not my youngest, but the two in the middle.

7 Q. That who would?

8 A. That Manuel would rape them.

9 Q. And that's when you asked for this meeting  
10 with the Elders?

11 A. From what I recall, it is. Because I  
12 recall telling them that he was, you know, he  
13 was -- I just hate to think about it, but, yeah,  
14 putting a pillow on her face and, yeah, raping her.

15 Q. And what did Martin Svenson and Gary Baker  
16 tell you in response to what you told them?

17 A. The thing I remember is that they -- you  
18 know, they were saying we had to be careful. They  
19 didn't want it all out there. They wanted to know  
20 if anybody had seen it, if there was another person  
21 that knew that could verify it, you know, a witness  
22 to it. And I just remember that scripture they  
23 read, like, two or more -- I can't even remember  
24 the name of the scripture, but two or more to bear  
25 witness or something. You know, and they're -- my

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**Yolanda Fraser**

1 daughter was devastated because she said it just --  
2 it -- you know, didn't believe her.

3 Q. And I think that you said earlier that  
4 they told you not to tell anyone else. The Elders  
5 told you that?

6 A. Yes.

7 Q. And did they specifically tell you not to  
8 report it outside of the church?

9 A. I asked about reporting it. I come from a  
10 community where there's -- the social services and  
11 stuff are pretty active there, and, I don't know, I  
12 just thought it should be reported.

13 But they did say that they were going to  
14 look into it more and, you know, let us -- there  
15 was nothing -- we didn't get anything except to --  
16 I wanted counseling for my children, you know. But  
17 we didn't get anything.

18 Q. And did you report this to the police at  
19 any point?

20 A. No.

21 Q. And how come?

22 A. Because at the time the first and foremost  
23 thing that I was taught in the congregation was  
24 that we never would defame Jehovah's name in any  
25 way. And so I just remember it was really a

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**Yolanda Fraser**

1 struggle, because I felt that my hundred percent  
2 loyalty was there, what it belonged to.

3 Q. To --

4 A. To Jehovah.

5 Q. And so I think you understand this, but  
6 just let me ask the question. Why is it that you  
7 understood that reporting it, reporting the sex  
8 abuse of your kids to the authorities, why did you  
9 believe that that would be tarnishing Jehovah's  
10 name or bringing something bad --

11 A. One thing that they brought out was it  
12 would be in all the papers and -- newspapers and  
13 the news, and what would that do to his name, you  
14 know.

15 Q. This is what the Elders said to you?

16 A. Yes.

17 Q. Did you feel like they were trying to  
18 encourage you to report it or discourage you or  
19 that they were neutral?

20 A. No, they didn't want me to report. They  
21 didn't want us to report it.

22 Q. And at the time, what was your thought  
23 about why they were asking you not to report it?

24 A. At the time it was so that the community  
25 wouldn't know; that there wouldn't be nothing, you

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**Yolanda Fraser**

1 know, blasted out in the newspapers and any  
2 defamation.

3 Q. How about now? Do you have --

4 A. Now I would report it.

5 Q. And do you have a different perspective on  
6 why they weren't reporting it or didn't want you to  
7 report it now?

8 A. I have a different perspective now, but --

9 Q. And what is that perspective now?

10 A. Well, I've had -- I've had some of the  
11 Elders that are there now come out to my home in  
12 the last, like, ten years, about three times, and  
13 try to get me to go back. And I just called them  
14 out as hypocrites because there still hasn't been  
15 anything done. And all they want to do is sit  
16 there and tell me I have to think of my  
17 ever-lasting life, you know.

18 So I still feel like it's coercion. I  
19 have to -- if I'm ever going to meet my son that  
20 passed away or my husband, I'll never meet them if  
21 I don't go back. That's bullshit.

22 I told them, I said I have a personal  
23 relationship with Jehovah and he's never abandoned  
24 me ever. It's just that I had to separate from the  
25 dysfunctionality there.

**Yolanda Fraser**

1           But did any Elder tell you not to report  
2 the abuse to the police?

3           A.    I would say yes.

4           Q.    Okay.  Which Elder told you that?

5           A.    Martin Svenson.

6           Q.    At any subsequent meeting with the Elders,  
7 did any Elder ever tell you explicitly, you cannot  
8 report this to the police?

9           A.    You cannot report this to the police?

10          Q.    Or don't report this to the police.

11          A.    In any subsequent meeting?

12          Q.    Yes.

13          A.    My recollection is that I was told that at  
14 the first meeting.  I wasn't --

15          Q.    You're -- oh, sorry.  Go ahead.

16          A.    I wasn't told it at every other meeting  
17 that we had, like the follow-up meetings.

18          Q.    And your understanding of this first  
19 meeting is that it occurred in the mid 1980's.  Is  
20 that right?

21          A.    Regarding Manuel.

22          Q.    When you talked to the Elders about Manuel  
23 or Manuel, he had abused your daughter and your two  
24 sons.  Did you discuss the abuse of all three of  
25 those individuals with the Elders at that time?

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