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

TRACY CAEKAERT, and Case No.
CAMTILITA MAPLEY, CV-20-52-BLG-SPW

Plaintiffs,

vs.

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

Defendants,

ARIANE ROWLAND, and DEPOSITION UPON ORAL JAMIE SCHULZE, EXAMINATION OF CARLA (HAIN) KLESSENS

Plaintiff,

vs.

WATCHTOWER BIBLE AND Case No. TRACT SOCIETY OF NEW YORK, INC., et al,

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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1	A. Not that I can remember. I remember being
2	at their house in the basement. There was a pink
3	room and a green room, and I remember us girls
4	being in on the bed. And what I the only thing
5	I can remember is a bunch of guys standing around
6	the bed.
7	Q. By "a bunch of guys," do you mean like
8	other boys your age, or adult men
9	A. No, adult men. Quentin Means was there;
10	Martin. I don't remember a lot of it. I only
11	there's only bits and pieces of it. But the colors
12	of the room, I can see, and I can see the guys
13	standing around the bed.
14	We spent a lot of time over there because
15	Martin's daughter, Myrna, had Mindy and Cory, and
16	they were I mean, we were always over there
17	playing. There was always kids downstairs in the
18	basement.
19	Q. Of the Svensen house?
20	A. Yeah.
21	Q. Do you think Martin Svensen ever abused
22	you?
23	A. I don't think so. I couldn't tell you for
24	sure. That one that I I don't know. I know
25	there was there's things that I remember that I

think maybe are just dreams, but -- when I would 1 2. stay with Mindy, and somebody coming in the room in 3 the middle of the night. But nothing that stands 4 out to say, hey, you know, this is what happened. 5 Nothing like that. Q. 6 Okay. How old do you think you were at 7 the time? Probably went there from the time I was 8 Α. 9 four until I was 17, 18, you know. Do you remember who any of the other 10 Ο. children in Martin Svensen's basement were with 11 12 you? 13 Jamie and Mary Ann. Nissie and Jody Α. 14 Warnock. Colette and Judy Schmidt. It was another 15 one of them places where all of us kids hung out. 16 Millie would -- we would do mints for weddings for 17 people that were getting married. Kind of just one of them places to go, or -- it wasn't far from 18 19 school, you know. It was just somewhere when 20 parents worked, we would go hang out at Martin and 21 Millie's until they came and picked us up. Or we'd 22 go there after we got done going to service. We'd 23 go stop at their house, and Millie would have 24 sandwiches and stuff for us. 25 Did you ever hear of any other children in Q. 29

1	passed away, when Gunnar Hain came down into your
2	room and was touching you inappropriately or trying
3	to feel your baby, did you ever report that to the
4	Elders of the Hardin Congregation?
5	A. No. Once they had said they were going to
6	disfellowship me, I had no need to talk to them. I
7	had no need to let them know anything else that was
8	going on.
9	Q. So at any point in time do you know if the
10	Elders of the Hardin Congregation ever called the
11	police to report Gunnar Hain for child sexual
12	assault?
13	A. I do not believe so, but I don't know for
14	sure.
15	Q. Do you know if the Elders of the Hardin
16	Congregation reported it to anyone?
17	A. I know they were waiting for word back
18	from New York for discipline. When I was four, I
19	remember them not knowing how they were going to
20	take or handle it. I know that he had to wait
21	for a week or whatever for that was one of the
22	things that he was upset about, you know. Because
23	it hadn't been very long that they had made him an
24	Elder, and then had to take that away, so but I
25	know I know that they did get ahold of New York.

1	Q. And how do you know that?
2	A. Because I remember mom talking about it,
3	about them waiting to see how they were going to
4	handle it. I remember Gunnar sitting down and
5	telling us that this is you know, we had to
6	wait. Because for him to be an Elder, he was it
7	was something that he made a big deal of in the
8	house, you know, all proud of it and everything.
9	So when they took it, it was something that he made
10	a point to let us girls know that, you know, he
11	wasn't happy, he wasn't he worked for a long
12	time to become an Elder, and that just didn't
13	that little bit of talking out of my mouth, that he
14	lost that. So the guilt that he tried to put, it's
15	just something that sticks out.
16	Q. Do you remember any circuit overseers
17	visiting the Hardin Congregation?
18	Hold on. Let me back up.
19	A. Some of them
20	Q. Do you know what a circuit overseer is?
21	A. Yeah.
22	Q. And what's a circuit overseer?
23	A. They come in and do special talks,
24	special whatever, more sometimes to depending
25	on what's going on in the congregation, to address

1	telling what's going on. And yeah.
2	Q. Are your memories of those events a little
3	weak?
4	A. My memory is a little weak. I was hit in
5	2017 and have a nice gash in my head, so my memory
6	is not awesome.
7	The reason I remember when I was four,
8	like I said, is because Gunnar was very upset about
9	it, and that was something he made sure that he
10	told us told me about specifically. Like I
11	said, my cat in my in the house, and my turtle,
12	and threatening my mom and my sisters. That was
13	it sticks out in my head.
14	Q. You say you were hit in the head in 2017?
15	What happened?
16	A. I had there was a 15-year-old girl
17	stole her dad's truck and hit me. I was driving a
18	Jeep. And I hit Tiny's.
19	Q. Oh, it was a car accident?
20	A. Yeah.
21	Q. And you hit your head?
22	A. Yeah.
23	Q. Did you have a concussion?
24	A. I got a seven-inch cut on my head an inch
25	and a half deep with staples in it.
	30