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IN THE UNITED STATES DISTRICT COURT
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 2
                 FOR THE DISTRICT OF MONTANA
 3
                      BILLINGS DIVISION
 4
     TRACY CAEKAERT, and
 5
     CAMILLIA MAPLEY,
 6
              Plaintiffs, Case No. CV-20-52-BLG-SPW
 7
          vs.
 8
    WATCHTOWER BIBLE AND TRACT
 9
    SOCIETY OF NEW YORK, INC.,
10
    WATCH TOWER BIBLE AND
11
    TRACT SOCIETY OF
12
    PENNSYLVANIA, and BRUCE
13
    MAPLEY SR.,
               Defendants.
14
15
    WATCHTOWER BIBLE AND TRACT
16
    SOCIETY OF NEW YORK, INC.,
17
               Cross Claimant,
    BRUCE MAPLEY, SR.,
18
19
               Cross Defendant.
20
21
    ARIANE ROWLAND, and JAMIE
22
    SCHULZE
                                 Cause No. CV 20-59-BLG-SPW
23
               Plaintiff,
24
         vs.
25
    WATCHTOWER BIBLE AND TRACT
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1	A. (Nods head.)	
2	Q. And then Helena.	
3	A. Yes.	
4	Q. Which Which Kingdom Hall is in Helena?	
5	A. I'm in Canyon Ferry congregation.	
6	Q. Okay. And have you been a member of	1
7	other congregations in Helena?	
8	A. No.	
9	Q. Just that one?	
10	A. Just that one.	
11	Q. Okay. And is that the full list of the	
12	congregations where you've served as a member?	
13	A. All the All those places that I've	
14	been.	
15	Q. Yeah.	
16	A. In Helena, this is the only one, yeah.	
17	Q. Okay. All right.	
18	Let's talk about paragraph 3 of your	
19	affidavit. The first sentence you state that	
20	Bruce, Sr. was a pedophile who started molesting	
21	Tracy when she was four. And then you say [As	
22	Read]: "This came out in 1977 when we learned that	
23	another Ministerial Servant in the Hardin	
24	congregation, Gunner Hain, had sexually molested	
25	Tracy at his home."	60
L		90

1 Α. Yes. Why do you say 1977? You fairly -- How 2 Ο. 3 do you feel about that number, that year? certain about that? 4 5 Α. Yes. 6 Ο. Tell me why. 7 Α. Because it was brought to my attention 8 all this stuff had happened, and I --9 Q. How -- How was it brought your attention? 10 Α. Well, because of Gunner Hain, it came 11 out. He was reproved, but they didn't do anything 12 to Bruce 'cause he -- Anyway. I was told what had 13 happened, and then Bruce admitted he had too, 14 so -- but they didn't do anything with Bruce but 15 they did something -- they -- Gunner Hain was reproved is all. 16 17 Q. Who told you that? 18 Α. Harold Rimby. 19 And so when you say this came out in Q. 1977, that -- that -- Harold Rimby told you 20 21 personally --22 Α. Yes. 23 Q. -- about Gunner Hain. 24 Α. And my ex-husband. 25 Q. And your ex-husband molesting Gunner's 61

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1
     stepdaughter. Gunner had molested his
 2
     stepdaughter and Tracy.
 3
         Α.
               (Nods head.)
              How did Mr. Rimby know that?
         Q.
 4
 5
              MR. SWEENEY:
                             Objection. Speculation.
 6
         Α.
              Do I still answer?
 7
     BY MR. SHAFFER:
 8
         Q.
              Yeah, go ahead.
                                Yeah.
 9
         Α.
              Well, because Gunner told Harold.
10
         Q.
              And then Harold told you.
11
         Α.
              Yes.
12
              Okay. Sounds like Harold told you about
         Q.
13
    Gunner.
              Did -- In -- In the same conversation he
     told you that Bruce had done the same thing?
14
15
         Α.
              Yes.
              And do you know how Harold knew
16
17
    that -- that Bruce had molested Tracy?
18
              MR. SWEENEY:
                             Objection.
                                          Speculation.
19
    BY MR. SHAFFER:
20
         Q.
              Go ahead.
                          It's okay.
21
              Well, Bruce admitted to Harold that he
        Α.
22
    had.
23
         Q.
              Okay. And then Harold told you.
24
        Α.
              Yes.
25
        Q.
              Okay.
                     In 1977 -- Why do you say 1977 as
                                                             62
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1
     opposed to 1978?
 2
              Because it was the year after we were
 3
     baptized.
 4
         Q.
              Okay. So you feel -- you're certain
 5
     about that number, 1977.
 6
         Α.
               (Nods head.)
 7
         Q.
              Yeah.
                     Where were you when you had this
 8
     conversation with Mr. Rimby?
 9
              In our home at Fort Smith.
         Α.
10
              Who else was there?
         Ο.
11
         Α.
              My ex-husband.
12
         Q.
              So just the three of you?
13
         Α.
              Yeah.
                    Well, my children were there, too.
14
              Okay. And had Mr. Rimby announced he was
15
    going to come over to have this conversation with
16
    you or did he just show up, or how'd that happen?
17
         Α.
              I guess just showed up.
                                         I don't
18
                We didn't make announcements; we just
    remember.
19
    came --
20
         Q.
              Okay.
21
              -- to each other's homes.
22
        Q.
              I take it it was a surprise. It was
23
    shocking.
24
        Α.
              Yes.
25
              Is that fair?
        Q.
                                                            63
```

1	A. And the first thing I said was "We need
2	to call the authorities."
3	And Harold said, "I'll take care of it."
4	Q. Okay.
5	A. So I assumed he would, but he didn't.
6	Q. Okay.
7	A. I mean, maybe he did. He didn't call the
8	authorities, though. And that was my mistake.
9	Q. Was Harold an elder at that point?
10	A. Yes.
11	Q. And you're new to the church at that
12	point in time.
13	A. Yes.
14	Q. You understood that if Harold Harold
15	was essentially directing how to take care of this
16	situation. Is that right?
17	A. Yes.
18	Q. And would there be a consequence to you
19	as a member if you did if you disobeyed
20	Mr. Rimby's command to not tell the authorities?
21	A. No, there wouldn't have been a problem.
22	I just assumed he was going to do it. He said he
23	was.
24	Q. He said he was going to tell the
25	authorities or he was going to handle it?

1 Α. He was going to handle it. 2 Q. So he didn't say he was going to 3 tell the authorities. 4 Α. No, but I thought that's what he would 5 do. 6 Q. I see. And if he had done -- Let's say 7 he -- Let's say he told you not to, did you 8 understand you could go to the authorities if you 9 wanted to? 10 Α. Yeah. He didn't tell me I couldn't, but 11 I assumed he was going to take care of it. 12 Q. Okay. 13 And I should have done it. Α. 14 Ο. When did you -- When did you follow up 15 with him on that? 16 I never had any contact with -- I mean, I 17 never had any more conversations with him or 18 anybody else about it after that. 19 Okay. Did other people in the Ο. 20 congregation know that Gunner had molested Tracy 21 and Ronda? Α. 22 Yes. 23 How did they find out about it? Ο. 24 Α. Same way I did, I guess. I never asked 25 them. 65

1 Q. And is that because -- Was Tracy there 2 when Gunner molested Ronda? 3 Α. I'm assuming. I -- I don't know. 4 Q. Okay. But so you learned that 5 from Tracy. 6 Α. Yes. 7 Q. Okay. So going back here, you're talking 8 about you're in the home, Bruce sits the family 9 down, he asks Tracy to tell the family what 10 happened to her at Gunner's house, is that right, 11 essentially? 12 Α. Yes. And then he admitted he did it 13 to -- and he was sorry, he'd never do it again. 14 Back in those days we didn't know about all 15 this -- terrible things, so we assumed when 16 somebody says you're sorry and they're not going 17 to do it again, they don't, but that was wrong, 18 too. 19 And so in 1977 in your home when Bruce Ο. has Tracy tell the family what Gunner had done to 20 21 her, in that same conversation, he told your 22 family, that would be you, Tracy, Camie, and 23 Bruce, Jr., right? 24 Α. Yes. 25 Q. That -- That he had been molesting Tracy 72

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as well.
 1
 2
         Α.
              Yes.
 3
              Was Tracy upset during that?
         0.
                                               Was she
     crying or?
 4
 5
         Α.
              Course she was.
 6
         Ο.
              She was?
 7
         Α.
              Yes.
              How about Camie?
 8
         Q.
 9
         Α.
              Camie never said much.
10
              Okay. What did Bruce say he'd been doing
         Q.
11
     to Tracy?
              You know, he never did say. He just said
12
         Α.
    he molested her, so I used my imagination.
13
14
         Q.
              Okay.
15
              MR. SWEENEY:
                             Mind if we take a break?
16
              MR. SHAFFER:
                             Yeah, that's fine.
17
              MR. SWEENEY:
                             Thank you.
18
              THE VIDEOGRAPHER: Let's go off the
19
    record.
              It's 10:23.
20
               (Recess taken from 10:23 a.m. to
21
    10:36 a.m.)
22
              THE VIDEOGRAPHER: We're back on the
23
    record.
              It's 10:36.
24
    BY MR. SHAFFER:
25
         Q.
              Ms. Mapley, I should have mentioned
                                                             73
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