

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.,
WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY, SR.,

VIDEOTAPED DEPOSITION
UPON ORAL EXAMINATION
OF JAMES ROWLAND

Defendants.

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

Plaintiffs,

vs.

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

Defendants.

James Rowland

1 they did it to me anyhow, I'd have been like an
2 apostate. But as it was, I was removed from
3 responsibility and kicked out of the congregation
4 anyway, without a hearing, without "Boo." The
5 circuit overseers came out there, and
6 Brother Miller, "You have to sign this. They
7 decided against you."

8 Q. It was when you were disfellowshipped?

9 A. Kicked out of the congregation and my
10 responsibilities taken.

11 Q. Yeah.

12 A. It was the exact opposite of what I was
13 trying to do, protect these kids. And a lot of
14 them are hurt.

15 We've got ex-Witnesses out there in
16 Lame Deer that are a case in point. One -- both of
17 them are drug addicts. One was like a whore, and
18 the other one's in and out of treatment, brother
19 and sister.

20 The people that abused these kids, they
21 don't know why it's called death of the soul. It's
22 because those -- and even my family, they broke us
23 all up. We had to recover from it. We're still
24 recovering. They don't know that. Plus they
25 probably don't give a damn, you know, the

131

James Rowland

1 pedophiles.

2 But what used to -- what really got me and
3 still gets to me this day is that when we come
4 together as a body of elders, and something
5 serious -- and I don't know if you're going to ask
6 me how the circuit overseers treated me. I'll tell
7 you.

8 I said in one, the first meeting,
9 Brother Polakowski, I said, "There's something
10 serious going on with Martin." I said, "We've got
11 to talk about it as a body of elders." He jumped
12 up, and I thought he was going to hit me. Come
13 running across. He said, "Don't you ever say
14 anything about Martin Svensen again. Got it?"

15 And that was the end of any hearing, or --
16 I don't know if they sent those papers to
17 the incident to New York. That was none of my
18 business, I guess.

19 And the other one, Brother --

20 Q. Let's go back. The one where the circuit
21 overseer came and said, "Don't ever talk about
22 Martin Svensen again" --

23 A. Yeah.

24 Q. -- and jumped -- you talked about that in
25 your affidavit, right?

132

James Rowland

1 A. Yeah.

2 Q. Do you remember what you told,
3 specifically what you told that circuit overseer?

4 A. I couldn't say nothing. He just said,
5 "And that's it."

6 Q. Tell me what you told him, if you can
7 remember.

8 A. I just said, "We've got to do something in
9 this congregation. There are bad things happening
10 to the kids, and it involves one of the elders,
11 Martin Svensen."

12 That's when he jumped up, came over, "If
13 you ever say anything more about Martin Svensen in
14 this matter," and shut me up right there.

15 And he was a circuit overseer.

16 Q. Right.

17 A. He was a substitute in Laurel, if he's
18 still alive.

19 Q. Okay.

20 A. The same thing happened with
21 Brother Milneck. He's the one that said, "If you
22 do anything wrong, I'm going to be like a millstone
23 around your neck when they throw you in the water."

24 Q. What did that mean?

25 A. Don't ever cross him up.

133

James Rowland

1 Q. Did you tell Brother Milneck the same
2 thing you told the other visiting overseer?

3 A. Yeah. He was sitting there --

4 Q. Where were you?

5 A. In a circuit overseer's visit with the
6 elders in Hardin.

7 Q. Were you in the Kingdom Hall, or --

8 A. Kingdom Hall. And I said, "There's
9 something going on, Brother Milneck." I said, "And
10 it can't go on much longer." I said, "There's
11 pedophilia in this congregation, rampant, and it
12 involves Martin Svensen."

13 He jumped up and come right over to me
14 like he was going to hit me. And I told my friend
15 later, I said, "Good thing he didn't hit me. I'd
16 have put all four of them on the floor." I'm a
17 kung fu man.

18 And I wouldn't have done that, because I
19 was very peaceful after coming into the truth, and
20 somebody could come and hit me, and I wouldn't
21 break their neck, you know, so...

22 Q. When you brought this to the attention of
23 the circuit overseers, as you've described in your
24 affidavit -- and first, let me just show you your
25 affidavit. Can you look at paragraph 4?

134