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Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.

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

TRACY CAEKAERT, and CAMILLIA) Cause No. CV 20-52-BLG-SPW
MAPLEY,)

Plaintiffs,)

**DECLARATION OF
MARVIN GENE SMALLEY**

vs.)

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

Defendants.)

Witnesses, I have never been responsible for drafting or writing those materials.

6. I am a voting member of WTNY and co-defendant Watch Tower Bible and Tract Society of Pennsylvania (“WTPA”) and have been for decades, but I do not recall when my memberships began.

7. During the entire time of my membership with WTNY and WTPA, I have never cared for, corresponded, or communicated with congregations in Montana.

8. During the entire time of my membership, I was neither a board member nor executive officer of either WTNY or co-defendant WTPA.

9. As best as I can recollect over my life, I have never met nor do I know the plaintiffs in this lawsuit or any of the accused in this lawsuit.

10. I have never attended religious services at any meeting place of Jehovah’s Witnesses in Hardin, Montana.

11. I have briefly reviewed the allegations in the operative Complaint and I have no personal, direct, or indirect knowledge about any of the abuse allegations other than what was learned from reviewing that Complaint.

12. While I am acquainted with the beliefs and practices of Jehovah’s Witnesses, other members of the religious Order are younger and far more conversant in child abuse matters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of October, 2022.


MARVIN GENE SMALLEY