

Exhibit N

Shirley Gibson

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

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

vs.

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

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
Plaintiff,

vs.

WATCHTOWER BIBLE AND TRACT

Shirley Gibson

1 SOCIETY OF NEW YORK, INC.
2 and WATCH TOWER BIBLE AND
3 TRACT SOCIETY OF
4 PENNSYLVANIA,
5 Defendants.

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9 VIDEOCONFERENCE/VIDEOTAPED DEPOSITION
10 UPON ORAL EXAMINATION OF
11 SHIRLEY GIBSON

12

13 BE IT REMEMBERED, that the
14 videoconference/videotaped deposition upon oral
15 examination of Shirley Gibson, appearing at the
16 instance of the Plaintiffs, was taken at 800 North
17 Last Chance Gulch, Suite 101, Helena, Montana, on
18 Thursday, April 14, 2022, beginning at the hour of
19 9:07 a.m., pursuant to the Federal Rules of Civil
20 Procedure, before Mary R. Sullivan, Registered
21 Merit Reporter, Certified Realtime Reporter, and
22 Notary Public.

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Shirley Gibson

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
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

Shirley Gibson

1 A. Yes.

2 Q. Why do you say 1977? You fairly -- How
3 do you feel about that number, that year? Pretty
4 certain about that?

5 A. Yes.

6 Q. Tell me why.

7 A. 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 A. Well, because of Gunner Hain, it came
11 out. He was reprovved, 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
16 reprovved is all.

17 Q. Who told you that?

18 A. Harold Rimby.

19 Q. And so when you say this came out in
20 1977, that -- that -- Harold Rimby told you
21 personally --

22 A. Yes.

23 Q. -- about Gunner Hain.

24 A. And my ex-husband.

25 Q. And your ex-husband molesting Gunner's

Shirley Gibson

1 stepdaughter. Gunner had molested his
2 stepdaughter and Tracy.

3 A. (Nods head.)

4 Q. How did Mr. Rimby know that?

5 MR. SWEENEY: Objection. Speculation.

6 A. Do I still answer?

7 BY MR. SHAFFER:

8 Q. Yeah, go ahead. Yeah.

9 A. Well, because Gunner told Harold.

10 Q. And then Harold told you.

11 A. Yes.

12 Q. Okay. Sounds like Harold told you about
13 Gunner. Did -- In -- In the same conversation he
14 told you that Bruce had done the same thing?

15 A. Yes.

16 Q. And do you know how Harold knew
17 that -- that Bruce had molested Tracy?

18 MR. SWEENEY: Objection. Speculation.

19 BY MR. SHAFFER:

20 Q. Go ahead. It's okay.

21 A. Well, Bruce admitted to Harold that he
22 had.

23 Q. Okay. And then Harold told you.

24 A. Yes.

25 Q. Okay. In 1977 -- Why do you say 1977 as

Shirley Gibson

1 opposed to 1978?

2 A. 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 A. (Nods head.)

7 Q. Yeah. Where were you when you had this
8 conversation with Mr. Rimby?

9 A. In our home at Fort Smith.

10 Q. Who else was there?

11 A. My ex-husband.

12 Q. So just the three of you?

13 A. Yeah. Well, my children were there, too.

14 Q. 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 A. I guess just showed up. I don't
18 remember. We didn't make announcements; we just
19 came --

20 Q. Okay.

21 A. -- to each other's homes.

22 Q. I take it it was a surprise. It was
23 shocking.

24 A. Yes.

25 Q. Is that fair?

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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?

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1 Q. Okay. Who -- Can you identify other
2 people who knew about it by name?

3 A. Martin Svenson, James Rowland,
4 Joyce Hains, June Rimby. All deceased now.

5 Q. Mm-hmm. Anyone else that you know that
6 knew about it?

7 A. No.

8 Q. Were you permitted to tell people about
9 it?

10 A. I could have, but I didn't.

11 Q. Okay. So you understood that you could,
12 you could have gone to the authorities or you
13 could have told people about it, but you didn't.

14 A. Yes.

15 Q. You chose not to.

16 A. I chose not to.

17 Q. Okay.

18 A. It was a mistake.

19 Q. Sorry?

20 A. Was a mistake.

21 Q. Okay. And had you ever been taught as a
22 member of the church that the elders direct how to
23 handle situations like wrongdoing within the
24 congregation?

25 A. Yes.

Shirley Gibson

1 Q. Okay. Tell me about that. When were you
2 taught that?

3 A. I suppose during my studies. I
4 don't -- I don't remember where I learned it. I
5 mean, it's just something we do.

6 Q. How was it supposed to work, then? So
7 there's -- there's alleged wrongdoing in the
8 church. How is it supposed to work? What are --
9 What are you supposed to do with that information?

10 A. Okay. You go to the elders.

11 Q. Okay.

12 A. You have a sit-down with them, tell them
13 the situation, and they take care of it.

14 Q. And they're in charge of handling that,
15 right, at that point?

16 A. Yes.

17 Q. It's out of your hands.

18 A. Yes.

19 Q. Okay.

20 A. Well, I mean, unless they need more
21 information.

22 Q. Okay. And is there a process that the
23 elders are supposed to use to determine if
24 wrongdoing has occurred?

25 A. I don't know how they handle it. I know

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1 they discuss it, and I don't -- I don't know.

2 Q. Yeah. Right. Is it a process, though,
3 that as a member you've -- you come to trust this
4 process, you're taught this process if there's
5 wrongdoing, you take it to an elder and you trust
6 it's going to be handled. Right?

7 A. Yes.

8 Q. Okay. And that's what you're taught as a
9 member.

10 A. Yes.

11 Q. Okay. Did you know Mr. Hain?

12 A. Yes, I did.

13 Q. And did he voluntarily go to Mr. Rimby
14 and the elders to say, "Hey," --

15 A. I have no idea.

16 Q. -- "I molested" --

17 A. I never asked.

18 Q. So you don't know how that came about.

19 A. Hm-mmm.

20 Q. And do you know what brought about
21 Bruce's decision to tell Mr. Rimby that he had
22 been molesting Tracy?

23 A. I don't know what his reason was.
24 Probably because he'd molested other girls, too,
25 so -- I don't know that for sure, but...

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1 A. So how could we control --

2 Q. Sure.

3 A. -- what he did?

4 Q. Sure. Yeah.

5 A. I don't think the organization should be
6 responsible for somebody's conduct.

7 Q. I understand, yeah.

8 Do you know what Mr. Rimby did, if
9 anything?

10 A. No, I do not.

11 Q. So you don't know if he did anything with
12 the information you gave him.

13 A. No.

14 Q. But you did trust that was the proper way
15 to handle it. Correct?

16 A. Yes.

17 Q. Okay. Tell me about that. Why did you
18 trust that that was the proper way to handle it?

19 A. Well, because Jehovah has an
20 organization. He's appointed men to shepherd our
21 congregation, take care of us.

22 Q. Those men being the elders.

23 A. Yes.

24 Q. In your experience with the church, have
25 you -- have you been able to observe how members