

Exhibit W

AFFIDAVIT OF SHIRLEY GIBSON

STATE OF MONTANA)
) ss.
COUNTY OF LEWIS AND CLARK)

The affiant, Shirley Gibson, being duly sworn, states as follows:

1. I am over the age of 21 years and am competent to and do state the facts and matters contained in this affidavit are true and based upon my personal knowledge.

2. I married Bruce Mapley Sr in 1965. We had three children, Tracey Caekert, Camilia Mapley and Bruce Mapley Jr. In 1975 Bruce Sr and I joined the Jehovah Witness church and some time thereafter Bruce Sr. rose to the rank of Ministerial Servant and I became an active volunteer doing service work. We divorced in 2001. I am currently an active member of the church, continue to do volunteer service work and it is my understanding and belief that Bruce Sr. continues to be an active member of the church as well.


3. Bruce Mapley Sr was a typical pedophile who started molesting Tracy when she was 4 years old. This came out in 1977 when we learned that another Ministerial Servant in the Hardin, MT congregation, Gunner Hain, had sexually molested Tracy at his home in Hardin, MT. Tracy was 11 or 12 at the time.

4. Also in or around 1977 Gunner Hain confessed to an elder that he had molested his step daughter Rhonda and my daughter, Tracy, and the word got back to Bruce Sr. who then confronted Tracy about what happened. Tracy told her father who then gathered our family together at the house and asked Tracy to tell her story again. During that meeting Bruce Sr. confessed in the presence of our entire family that it was his fault because of what he had been doing to Tracy. He admitted that he had been molesting Tracy and that he was really good at hiding it.

5. Shortly after this meeting I personally spoke with elder Harold Rimby at the Hardin, MT congregation about what Bruce Sr had been doing to Tracy and what Gunner Hain had done to Tracy. During that conversation I asked elder Harold Rimby if we should report the matter to the authorities and he said no, that the church will handle the matter internally. I was new to the congregation so I did what I was told and didn't question Harold Rimby's decision.

6. Shortly thereafter I was present when Gunner Hain was put on public reprove at the Hardin, MT congregation. As far as I know no disciplinary action was taken against Bruce Sr. Approximately 6-8 months later Gunner Hain was reinstated with full privileges.

7. Further your affiant sayeth not.



Shirley Gibson

Subscribed and sworn to before me this 22 day of March, 2020.



Notary Public

My Commission Expires: 03/22/2021

