

Exhibit II

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., et al,

Defendants,

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

VIDEO-RECORDED
DEPOSITION UPON ORAL
EXAMINATION OF THOMAS
MEYERS

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and
JAMIE SCHULZE,

Plaintiff,

Cause No.
CV 20-59-BLG-SPW

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF
NEW YORK, INC., et al,

Defendants.

Thomas Meyers

1 ministerial servant could sit on?

2 A. Not that I've ever heard of.

3 Q. All right. And what I'm asking, I guess,
4 is how -- how would you know that, say, Elders can
5 be on a judicial committee but ministerial servants
6 should not? Or would that be up to you guys in
7 Hardin?

8 A. No. That's -- that's -- that's
9 organizational information, yeah.

10 Q. And when you say, "organizational," what
11 do you mean by that?

12 A. It's something set by the Watchtower
13 organization, the brothers back at the service
14 department, for example.

15 Q. And how would that information be conveyed
16 to you as an Elder when you're an Elder?

17 A. It's in print. We -- we receive letters,
18 not a whole lot of them, but periodic ones,
19 especially if something is changed.

20 There's also an Elder, like, handbook, if
21 you will, that gets updated periodically.

22 Q. All right. And is there more than one
23 Elder handbook? I've seen a few that look like --

24 A. It's just evolved over time.

25 Q. And what do you call it? Do you call it

Thomas Meyers

1 an Elder handbook, or do you have another name for
2 it?

3 A. Currently it's called the shepherding
4 book.

5 Q. And -- Shepherd the Flock, or is that a
6 different --

7 A. Something like that, yeah. It changes.
8 My memory's not good.

9 Q. But it sounds like, regardless, it was --
10 those directions were in print and that they came
11 from what you described as the Watchtower Society.
12 Is that --

13 A. That's correct.

14 Q. The service department was your
15 understanding? Is that --

16 A. Right. Yes.

17 Q. Did you ever have input on those policies
18 when you were an Elder?

19 A. No. I don't know what you mean, I guess.

20 Q. Did you -- when you were an Elder, did you
21 ever give input to the circuit overseer about what
22 should be included in the manuals?

23 A. I don't recall ever doing it. I don't --
24 may -- might have expressed my opinion here and
25 there, but not -- nothing that I can remember.

Thomas Meyers

1 Q. Other than the manuals that -- that you
2 described, that the names have changed, were there
3 other places that you -- when you were an Elder,
4 that you got directions about how to perform your
5 duties as an Elder?

6 A. No. It was always in print.

7 Q. So you didn't have to look anywhere else
8 other than those periodicals and the printed
9 materials that laid out the directions for being an
10 Elder?

11 A. Yes.

12 Q. And would those materials that you're
13 describing, would each Elder have a copy sent to
14 them, or would there be, like, one reference, or
15 did it vary?

16 A. We would each have our own copy, yeah.

17 Q. All right.

18 A. Currently, it's all digital, so that
19 simplifies everybody having a copy.

20 Q. For sure.

21 A. Yeah.

22 Q. When did that change happen? Do you
23 remember at all?

24 A. No, I don't remember. I know -- I feel
25 like I'm left in the dust, you know, on that one.

Thomas Meyers

1 And so in that box, where it says, "The
2 governing body has approved the recommendations,"
3 what's your understanding of what the governing
4 body's role was there?

5 A. Apparently they review this -- and, well,
6 there is something here about what you read earlier
7 that maybe they'd have -- would draw them to ask
8 more questions, perhaps. I don't know. But on
9 this form it didn't look like there was any
10 questions that they came up with, so they approved
11 it.

12 Q. And is it your understanding that the
13 governing body is the one who approves the
14 appointment of others?

15 A. I suppose so.

16 Q. And I understand that that's what this
17 says, but I'm asking for was that -- is that your
18 understanding?

19 A. I don't know personally if they read this
20 themselves. I don't know. I have no idea. But
21 they obviously take responsibility for putting a
22 stamp on it.

23 Q. And so when you say "they" --

24 A. The governing body, I was referring to.

25 Q. And -- okay. And so the -- do you

Thomas Meyers

1 have a reason, so --

2 Q. In the nineties?

3 A. In the nineties, yeah. So what we would
4 tell them -- we -- I mean, I think I only know of
5 one case, and the one we're dealing with, you know,
6 period. I think what we told them was that they're
7 free to do it, but we wouldn't stop them or get in
8 their way if they wanted to report it. But today
9 we report it.

10 Q. And when you say, "we," you mean the
11 Elders?

12 A. The Elders, yeah.

13 Q. But in the nineties, that was not the
14 case?

15 A. Correct.

16 Q. And why was that not the case then?

17 A. Like I said is -- they may have wanted to
18 keep it to themselves, not involve the authorities.

19 Q. And I appreciate that explanation. What I
20 was asking is do you know why the policy changed is
21 what I'm asking?

22 A. No.

23 Q. Whose policy was it? Was it the Hardin
24 congregation policy?

25 A. No, no, no. It was the Watchtower Bible

Thomas Meyers

1 and Tract Society of New York.

2 Q. Okay. That was the -- in the nineties, it
3 sounds like, the policy as you understood it from
4 Watchtower was report it if the victim -- or if the
5 victim wants to report it, they can.

6 A. Yeah, and we wouldn't get in their way or
7 there would be no whatever, repercussions or
8 anything like that.

9 Q. But it would be up to them --

10 A. It would be up to them, right.

11 Q. And now the Elders report reports of child
12 abuse.

13 A. Correct.

14 Q. Is that right?

15 A. Correct.

16 Q. Do you know what the policy was prior to
17 you becoming an Elder?

18 A. No.

19 Q. Do you have an understanding of why the
20 policy -- why Watchtower's policy changed?

21 A. No. Not in any kind of authoritative way.
22 I would assume it had -- you learn from experience
23 that maybe the other policy didn't work so you
24 adjust it.

25 Q. And in the nineties, were you as an Elder

Thomas Meyers

1 Do you understand what that means?

2 A. I believe so.

3 Q. And what's your understanding?

4 A. Well, whoever the offended would be could
5 sue you if you, you know, told the public or people
6 in the public about their personal information.
7 That's my understanding anyway.

8 Q. Okay. And let's jump to the last sentence
9 of that paragraph on [Exhibit 12](#). "These
10 possibilities underscore," and then it's bolded,
11 "the need for Elders to be discerning and to follow
12 carefully directions provided by the Society."

13 Did I read that right?

14 A. Yes.

15 Q. And was that your experience as an Elder?

16 A. Yes.

17 Q. Did you follow the Society's directions
18 carefully?

19 A. Did the best we could. Or I did the best
20 I could. I'm answering for myself there, I guess.

21 Q. I -- yeah, let's keep going with this
22 [Exhibit 12](#). The last paragraph here, there's a
23 heading that says, "What to Do in Specific Cases,

24 A. Judicial Committee Matters."

25 Do you see that?

Thomas Meyers

1 how to go about this?

2 A. Well, because the -- the -- I don't know,
3 call it a crime, you know, because of the stuff
4 that happened, was kind of old, you know. It was
5 decades old. We needed to get some direction,
6 because the direction we had basically was, you
7 know, if this happened in recent -- last couple,
8 three years, you know, we're talking a couple,
9 three decades, so we needed to get some kind of
10 information what to do about it.

11 Q. And were you ever trained how to talk to
12 victims of -- child victims of sexual abuse?

13 A. In general terms, yeah.

14 Q. By whom?

15 A. We'd go to these Elder schools. There's
16 things in The Watchtower and Awake! too on that.

17 Q. So you turned to The Watchtower and Awake!
18 and go to some conferences?

19 A. Yeah.

20 Q. And what did you -- what did you learn
21 specifically?

22 A. To not do all the talking.

23 Q. Did you learn the process of taking
24 interviews and talking to victims of abuse?

25 A. Try to draw them out, get the facts, and

130