

Jon A. Wilson  
Brett C. Jensen  
BROWN LAW FIRM, P.C.  
315 North 24<sup>th</sup> Street  
P.O. Drawer 849  
Billings, MT 59103-0849  
Tel. (406) 248-2611  
Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*)  
MILLER MCNAMARA & TAYLOR LLP  
100 South Bedford Road, Suite 340  
Mount Kisco, New York 10549  
Tel. (845) 288-0844  
Fax (845) 288-5700  
*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  
ALLEN SHUSTER**

vs. )

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

Defendants. )

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over 12,000 congregations of Jehovah's Witnesses nationwide. In addition, it is used in the organization of larger conventions of Jehovah's Witnesses to contract with arenas, stadiums, and hotels and motels annually. CCJW's activities are carried out by over 200 members of the Order on-site in New York and 300 volunteers located throughout the United States, and along with Mr. Gary Breaux (whose deposition was also noticed by plaintiffs), I oversee these individuals. This is not an exhaustive list of the activities of CCJW, but is designed to provide the Court with insight into my responsibilities.

5. Starting in 1985, I was authorized by the board of directors of WTNY to communicate with congregations regarding spiritual matters using WTNY's letterhead. That role ended in 2001.

6. During that entire time, I was neither a board member nor executive officer of either WTNY or co-defendant Watch Tower Bible and Tract Society of Pennsylvania ("WTPA").

7. During that entire time, I never cared for, corresponded, or communicated with congregations in Montana.

8. 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.

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

10. 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 as a result of reviewing that Complaint.

11. While I am acquainted with the beliefs and practices of Jehovah's Witnesses, there are other members of the religious Order with less responsibilities who are as conversant in the handling of 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 17 th day of October, 2022.

*Allen Shuster*  
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ALLEN SHUSTER