

DEPOSITION VIDEOS

 Hoffman, Jonathan (Vol. 01) - 05/21/2014

1 CLIP (RUNNING 03:34:08.182)

 Plaintiff and Defendant Designations Merged

HOFFMAN 153 SEGMENTS (RUNNING 03:34:08.182)



1. PAGE 8:18 TO 17:06 (RUNNING 00:09:07.500)

18 Q. Good morning, Mr. Hoffmann.
19 A. Good morning.
20 Q. Can you please tell us where you
21 reside?
22 A. Right now, I reside in Jerusalem,
23 Israel.
24 Q. Did you fly here to New York for
25 your deposition?
00009:01 HOFFMAN
02 A. I did.
03 Q. Okay. Are you single or married?
04 A. I am married.
05 Q. Okay. How long have you been
06 married, sir?
07 A. For almost three and a half years.
08 Q. Do you have any children?
09 A. I have one daughter.
10 Q. And how old is she?
11 A. She is almost two and a half.
12 Q. Can you briefly summarize for us,
13 please, your educational background?
14 A. I have a bachelor's in psychology,
15 and I'm working right now toward a master's in
16 social work through Long Island University.
17 Q. Okay. Are you also doing any
18 studies in Israel now?
19 A. I am doing studies in a Jewish
20 yeshiva. I study -- it's called Mayanot,
21 M-A-Y-A-N-O-T.
22 Q. I notice you're wearing a Yamaka.
23 What's the significance of that?
24 A. The Yamaka is a Jewish symbol. It
25 represents my belief that there is a higher
00010:01 HOFFMAN
02 power of God watching over me and protecting
03 me, being there for me. Pretty much that idea.
04 Q. Okay. Thank you.
05 Are you working at this time?
06 A. Yes, I am.
07 Q. What type of work do you do, sir?
08 A. I do part-time life coaching for two
09 hours, one to two hours a day after I am done
10 studying in my yeshiva in Jerusalem.
11 Q. What type of life coaching do you
12 do, sir?
13 A. I do life coaching for men who are
14 struggling with unwanted same sex attractions.
15 In addition to men or any -- it can be men or
16 women, but right now all my clients are men who
17 are just simply struggling with any
18 self-identity issues, issues around
19 relationships and connections to other people
20 in their lives, et cetera.
21 Q. Do you have any long-term career
22 plans yet?

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23 A. Yeah. I hope to graduate getting
24 the master's in social work, and become a
25 licensed therapist, and God willing, open up my
00011:01 HOFFMAN
02 own practice, and then even further than that,
03 open up a wellness center that helps men and
04 women with all sorts of issues.
05 Q. Why do you want to do that kind of
06 work?
07 A. Because I believe in it. A lot of
08 the work has definitely enhanced my life, and I
09 really do have a passion at giving back what --
10 that which has helped me, and trying to help
11 other men who are in the same need that I was
12 in, try to grow in the way that they choose.
13 Q. Okay. I'm going to ask you if you
14 know any of the parties in this case, starting
15 with my clients, Arthur Goldberg, Elaine Berk,
16 Alan Downing, do you know any of them?
17 A. Yeah, of course.
18 Q. How do you know them?
19 A. Arthur Goldberg was, out of the men
20 that you've mentioned and woman, was the first
21 person I met. I called him when I was the age
22 of 19, looking for help with my unwanted same
23 sex attractions, and he became a mentor and
24 more of a -- just a very good influential
25 figure in my life when I started that work.
00012:01 HOFFMAN
02 Then Alan Downing, he became my own
03 life coach five years ago after I moved to New
04 York in 2008, and he has been one of my best
05 mentors and even a friend, to a degree, and I
06 have a really strong relationship with him.
07 Elaine Berk, I know a little less
08 than everyone else, but she's still a figure
09 that I have met through being part of JONAH
10 when I was really heavily involved.
11 Q. There's another person I'm
12 representing who is not a party and not here,
13 but he has been deposed, Thaddeus Heffner.
14 Do you know who he is?
15 A. Yeah. Thaddeus Heffner was on my
16 first Journey Into Manhood weekend, the one
17 that I was a participant. He was a staff
18 member. And he became a really good friend
19 after that.
20 We don't really keep in touch
21 regularly, but we're friends.
22 Q. Now, do you also know any of the
23 plaintiffs in this case?
24 A. I do. I know Chaim Levin, Benji
25 Unger and Michael Ferguson.
00013:01 HOFFMAN
02 Q. How did you meet those gentlemen?
03 A. Chaim, I met through Arthur. We met
04 two months after I started my own journey, if
05 you want to call it that.
06 He was directed to me just as
07 someone that I could be in touch with and also
08 someone that I could somewhat mentor, again, it
09 was Arthur's intentions, but we became more
10 friends after we got to know each other.
11 Benji Unger I met also through
12 participation in JONAH. We became friendly.
13 We didn't become closest friends, unlike

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14 Michael and Chaim.
15 And Michael, like I just mentioned,
16 we became close friends in addition to
17 unhealthy friends, I would say, developing an
18 unhealthy relationship, which I'm sure we will
19 get to, but after I met him on a JIM weekend
20 that I staffed.
21 Q. Okay. You're right. We'll get to
22 more specific questions as to those. I just
23 wanted, at the outset, to establish kind of how
24 you fit into the picture here.
25 Can you tell us your reasons for
00014:01 HOFFMAN
02 wanting to go to JONAH?
03 A. Yeah. When I was the age of 19, I
04 was at my breaking point with the struggle of
05 having unwanted same sex attractions. I just
06 knew, for various reasons, that living as a
07 homosexual is something that I did not want,
08 and JONAH was a resource that I, by chance,
09 found that offered me help and resources to
10 move beyond my unwanted same sex attractions,
11 and they best coincide with my own value
12 system, with what I want for my life, with what
13 I want for my future, and that's primarily the
14 reason why I went to them.
15 Q. Were you raised from a religious
16 background?
17 A. I was not until the age of 14. And
18 then, at the age of 14, my whole family became
19 religious. I took on a lot more of a religious
20 way of living around then, but mostly after the
21 age of 16. And then I became very heavily
22 religious, I guess if you want to call it that.
23 Q. What denomination are we talking
24 about?
25 A. Jewish, Jewish Orthodox.
00015:01 HOFFMAN
02 Q. Before going to JONAH, have you ever
03 seen any other counselor for any other purpose?
04 By counselor, you know, I mean someone for any
05 type of psychological or emotional issues?
06 A. Yeah. I saw a therapist when I was
07 in the age of -- when I was in the 11th grade.
08 My parents sent me to this therapist because
09 they discovered that I was struggling around
10 that time with same sex attractions. The
11 therapist did not at all, although, have any
12 expertise at, I guess, whatever type of therapy
13 you want to call this, gender affirming
14 therapy, change therapy, conversion therapy,
15 whatever you want to call it, and it was more
16 talk therapy, and not so effective at all at
17 helping me with anything.
18 Q. What was it you were concerned about
19 your life, if anything, other than same sex
20 attraction? Were there any behaviors that were
21 of concern to you or your parents?
22 A. With the struggle?
23 Q. Right.
24 A. Yeah. I was an addict to porn, I
25 would say. At a very young age, I started
00016:01 HOFFMAN
02 acting out with men, random hookups, behavior
03 that I just felt beyond even religious reasons
04 was very destructive to my way of wanting to

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05 live a fulfilling life.
06 Q. Okay. When you were a minor, were
07 you having these sexual encounters with adult
08 men?
09 A. Yeah.
10 Q. When you went to see Mr. Downing for
11 the first time, what did you understand was the
12 type of work he did? Did you think he was a
13 life coach? And if so, was it different than a
14 licensed professional counselor? What was your
15 understanding?
16 A. I knew that he was a life coach, and
17 I met Alan Downing through my own JIM weekend.
18 He staffed it. And I immediately knew, when I
19 met him, that he was someone that I could turn
20 to for support, and he seemed to be very
21 knowledgeable about helping men effectively get
22 past unwanted same sex attractions.
23 So I knew when I went to see him
24 that he was -- he was a life coach, but what
25 mattered to me most was the expertise and the
00017:01 HOFFMAN
02 knowledge that he seemed to have about his own
03 life and about just the lives of many other men
04 who have pursued this path.
05 Q. Did it matter to you whether he had
06 any license at that time or not?

2. PAGE 17:08 TO 18:12 (RUNNING 00:01:18.943)

08 A. No, it did not.
09 Q. How long have you worked with -- how
10 long a period of time did you work with Alan
11 Downing?
12 A. I worked with him for --
13 consistently, which means once a week, for
14 about a year, and then it slowed down to
15 biweekly for another year, around, and I think
16 it was around -- I would say. And then I would
17 meet with him occasionally, and I still would,
18 whenever I have stuff that I need to process
19 and work through.
20 He's still someone I consider to be
21 a life coach of mine.
22 Q. So the way you would describe it
23 would it be at least regularly for two years?
24 A. Yeah, you could say that, uh-huh.
25 Q. All right. How would you describe
00018:01 HOFFMAN
02 Alan Downing?
03 A. As an extremely kind, warm, caring,
04 very humble politically correct man, someone
05 who really does care about the lives of any
06 struggler with anything, as one of my top
07 mentors, and as someone that I care very much
08 about.
09 Q. Okay. When you first started doing
10 work with Alan through JONAH, did you have any
11 understanding as to whether it was a --
12 Torah-based in its mission and purpose?

3. PAGE 18:14 TO 19:08 (RUNNING 00:00:52.000)

14 A. With Alan or with JONAH?
15 Q. Let's talk about JONAH.
16 What did you understand to be the
17 basis or mission of JONAH, if you had an
18 understanding?

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19 A. I understood that JONAH was a Jewish
20 organization. Quickly, once I got involved in
21 JONAH, I realized that, at its core in terms of
22 helping individuals, is not a religious
23 ideology, necessarily, that helps people move
24 forward. At least that's not the main thing.
25 I think there's an aspect of religiousness
00019:01 HOFFMAN
02 that's good to have, but JONAH uses tools and
03 resources that don't come necessarily from
04 Torah or Jewish ideology. So that's what I got
05 from JONAH.
06 Q. Did it matter to you how observant
07 you thought Arthur Goldberg or Elaine Berk may
08 have been in terms of their Jewish practices?

4. PAGE 19:10 TO 20:06 (RUNNING 00:01:00.032)

10 A. It did not, because, quite frankly,
11 there weren't any other resources in the Jewish
12 community that were providing Jewish men with
13 the help that I was looking for.
14 So I also considered Arthur to be
15 just a wonderful Jewish soul, regardless of
16 necessarily his strict adherence to everything,
17 and since the therapy really doesn't make a
18 difference in terms of how religious you are,
19 necessarily, Arthur and Elaine were providing
20 resources that were necessary and effective for
21 what I needed. Religious observance was more
22 of a side thing that I just noticed, but didn't
23 really find to be a difference in moving
24 forward with the journey.
25 Q. When you started doing the work with
00020:01 HOFFMAN
02 Mr. Downing through JONAH, did Mr. Downing or
03 Mr. Goldberg or Ms. Berk or anyone else
04 associated with JONAH make any promises or
05 guarantees that you would achieve any
06 particular result?

5. PAGE 20:08 TO 21:07 (RUNNING 00:01:10.733)

08 A. Never promises or guarantees. More
09 just -- never promise or guarantees. There was
10 never a hundred percent success rate or like I
11 promise this will happen or I guarantee this.
12 That was never something that was implied or
13 even said outright.
14 Q. When you started the program, what
15 type of expectations did you have as to the
16 type of work you would have to do or type of
17 commitment you would have to make?
18 A. The expectation was that this would
19 be -- it would require effort. It would
20 require work on my part. It would require --
21 there's no quick fix. There's no silver
22 bullet. There's no on or off switch to this.
23 It would be, quite simply, a journey. Not so
24 simple, actually. A journey with a lot of
25 variables, a journey that would require a lot
00021:01 HOFFMAN
02 of my effort and determination. And, yes,
03 that's what I definitely understood the work to
04 be.
05 Q. Did you have any set period of time
06 in mind as to the duration of the program when
07 you started it?

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6. PAGE 21:09 TO 24:11 (RUNNING 00:03:17.683)

09 A. No set time. I think it would be
10 impossible to give a time frame to this, quite
11 honestly. I think it varies on the individual.
12 I knew that it would require at
13 least, though, for me, and the average man, at
14 least a year, if not more, to really see, I
15 would say, permanent -- permanent progress,
16 yeah.

17 Q. Let's talk about the actual work you
18 did with Mr. Downing.

19 Can you tell us some of the things
20 it involved?

21 A. So, yeah. Alan Downing was a very
22 good life coach in speaking through matters
23 together. He would be very good at, I guess,
24 what you can call talk therapy initially to
25 start. We would speak about things that I was

00022:01

HOFFMAN

02 bringing to the table, and he would be very
03 good at helping me go deeper and deeper into
04 the core of what the issue really is, but what
05 was really great about Alan was that he would
06 take it beyond just sort of talk and getting to
07 the core of what the issues are, but then
08 moving beyond it, perhaps, with like physical
09 or action-oriented type of therapy or work in
10 the room. Very dynamic.

11 It would be literally about
12 sometimes in the room, kind of fighting through
13 the struggle to get to the other side in a way
14 that would be empowering, fulfilling, and he
15 was all able to do this with just a one-on-one
16 basis in a way that was just -- like created,
17 in some ways, a feeling of -- of movement, of
18 forward or change, if you want to call it,
19 literally after one session, and that was
20 something that was very unique, I felt, to a
21 life coach.

22 Q. In addition to the one-on-one
23 therapy sessions, did you attend any group type
24 sessions at the JONAH offices?

00023:01

25 A. Yes.

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02 Q. Did you do any Shabbatons, I guess
03 it's called?

04 A. The first weekend retreat that I did
05 was a JONAH Shabbaton, the very first one.

06 Q. What is a Shabbaton?

07 A. The JONAH Shabbaton is -- well,
08 right now, it's a pretty comprehensive retreat,
09 where men who are struggling with the unwanted
10 same sex attractions that are Jewish can come
11 and seek support and go through psychological,
12 psychodynamic and effective, I consider,
13 processes to fight through all sorts of
14 wounding.

15 When I went to the JONAH Shabbaton,
16 it was less advanced. It was the very first
17 one, but there were still processes that were,
18 I thought, effective and helpful, and the best
19 thing about the JONAH Shabbaton, when I went,
20 was the ability to meet other men who were
21 struggling, who were in the same boat as me,
22 feeling sort of this freedom of liberation that
23 I'm not alone, you know, in this journey with

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24 other men. It's not just me in isolation.
25 Q. Okay. And that's just for Jewish
00024:01 HOFFMAN
02 men?
03 A. Yeah. I believe it's just -- I
04 don't know how strict JONAH is with like its,
05 you know, discrimination, if you want to call
06 it. I don't think they are, but JONAH usually
07 accepts anyone. I mean, Michael Ferguson is a
08 good example, yes.
09 Q. I understand that. I was just
10 wondering about the -- whether the Shabbaton
11 itself was more uniquely a Jewish experience.

7. PAGE 24:13 TO 27:10 (RUNNING 00:03:16.589)

13 A. Yeah.
14 Q. Does it involve prayers as part of
15 it? What makes it religious?
16 A. It's not -- it depends on how you
17 define religious. I mean, there were prayers
18 at the Shabbaton because most of the Jews that
19 go want to have prayers, for the Sabbath
20 especially, and so that was incorporated into
21 the protocol, but the prayers, and even sort of
22 the religiosity or the religious things that we
23 do on the Sabbath weren't incorporated into the
24 actual processes of -- relating to unwanted
25 same sex attractions.
00025:01 HOFFMAN
02 Q. I see. Have you ever participated
03 in what's called a mikveh?
04 A. Yeah, most Jews do.
05 Q. What is a mikveh?
06 A. A mikveh is definitely not a
07 bathhouse. A mikveh is a place where men come
08 to purify their souls. We believe that there's
09 a concept of impurity that souls can carry that
10 we don't see, but it's on a deeper, more
11 spiritual dimension. And the mikveh is a place
12 where men can purify those impurities through
13 going through a specific type of waters.
14 There's a dunking process, and
15 it's -- yeah, it's just a place where all men
16 from -- all Jewish men go usually, especially
17 before the high holidays, to -- to do this
18 Jewish ritual. Nothing to do with, really, any
19 of the work that we do.
20 Q. In addition to the Shabbaton, did
21 you attend any group therapy or talk type
22 sessions at the JONAH offices?
23 A. Yeah, I did.
24 Q. And for how long a period of time
25 did you do that?
00026:01 HOFFMAN
02 A. So I was part of Alan Downing's
03 group for around two years. Since I did my JIM
04 weekend, which was in 2007, I think I was part
05 of groups from then on till 2009-ish. And I
06 think the longest group that I was in with Alan
07 Downing went for a year, but then there were
08 some breaks in between, and then I went to
09 groups for maybe like six months. It was
10 sporadic. I don't really recall the timeline
11 perfectly, but it was around two years I was
12 going to groups.
13 Q. About how often during that two-year

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14 period would you meet?
15 A. Once a week, yeah. I mean, once a
16 week, but, again, there was breaks, and then it
17 wasn't once a week. It was -- once a week when
18 the group was on is how the group went.
19 Q. Did any of the three plaintiffs that
20 you mentioned attend any of the same group
21 sessions with you?
22 A. Yeah, all three of them.
23 Q. And that was on multiple occasions?
24 A. Yeah. Chaim, the most. Benji --
25 yeah.

00027:01 HOFFMAN
02 Q. Did you also attend People Can
03 Change, what they call JIM or Journey Into
04 Manhood weekends?
05 A. Yeah, I attended I think the one
06 Chaim attended. He and I were participants
07 together, and then I have attended nine more as
08 a staff member.
09 Q. What's your understanding of the
10 purpose of the JIM weekends?

8. PAGE 27:12 TO 28:10 (RUNNING 00:01:05.700)

12 A. The purpose of JIM weekends are to,
13 similar to the JONAH Shabbaton, to help with
14 all men, not just Jewish men, who were
15 struggling with unwanted same sex attractions
16 to really look deeply at the core that's
17 driving their attraction, then to do all sorts
18 of processes that help men overcome different
19 aspects of the wounding that men believe are
20 involved in their attraction.
21 It's to really dig deep and to get
22 in touch with one's identity, with one's self
23 in a very true way.
24 And then, in addition to that, to be
25 able to bond and connect to other men in a

00028:01 HOFFMAN
02 healthy, non-sexual way, in a way that's very
03 fulfilling and effective and hopefully that can
04 last after the weekend.
05 Q. Did you feel, before you started
06 with JONAH or participated in People Can Change
07 weekends, that you were able to bond with men
08 in what you call a healthy, non-sexual way?
09 A. Before?
10 Q. Yeah.

9. PAGE 28:12 TO 30:13 (RUNNING 00:02:23.733)

12 A. Not always. That was the problem in
13 my judgment for myself, was that I had a very
14 hard time like connecting to men both in a
15 sexual way. You know, obviously, a lot of my
16 connections to men I could take sexually,
17 although we can get -- it's not so important, I
18 think, for like the details in that, but -- but
19 definitely before the workshops, the JONAH
20 workshop, and the JIM workshop, my connection
21 to men, I would say, was actually more damaged
22 on an emotional level. Like I had a very hard
23 time relating emotionally without there being
24 aspects of codependency or sort of clinginess
25 to a lot of the deep friendships that I made,

00029:01 HOFFMAN
02 and altogether, I just wasn't good at it. I

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03 was very isolated from a lot of men.
04 I didn't know how to just go forward
05 with friendships and initiate friendships in a
06 way that was long lasting and fulfilling. So
07 that's how I was before the weekends.

08 Q. Okay. You used the term
09 "processes."

10 What do you mean by that?

11 A. Processes on the weekends?

12 Q. Yes.

13 A. Well, there's just several different
14 processes that the weekend would bring up and
15 present throughout the course of the duration
16 of the weekend, which usually, for both the
17 JONAH and the JIM weekend, they're around two
18 and a half days, and processes are usually
19 around an hour in length, sometimes maybe
20 shorter, depends on what type of process, but
21 processes that are brought up, look at
22 different -- again, different aspects of a
23 person's dimension with this attraction,
24 especially those aspects that relate to
25 wounding from the past, wounding around

00030:01 HOFFMAN

02 self-esteem, self-identity, wounding in
03 relation to other men. It could be also women
04 as well, mother, father, friends, brothers and
05 all these processes that we would do would
06 start to look at sort of these specific
07 variables that we believe played a part in our
08 same sex attractions.

09 Q. Can you identify some of these
10 processes?

11 A. There's a lot of them, yeah.

12 Q. Well, we've heard of healthy touch.
13 What is that?

10. PAGE 30:15 TO 31:20 (RUNNING 00:01:27.176)

15 A. Healthy touch is a process that
16 enables men to experience intimacy that they
17 lacked throughout a lot of their lives,
18 intimacy that they crave. And intimacy does,
19 according to these processes, include a
20 physical dimension, a physical dimension of
21 receiving caring, warm, affirming touch that
22 men simply didn't have from other men growing
23 up, especially from important figures in their
24 lives, such as father or even friends, which I
25 believe is something that men need from each

00031:01 HOFFMAN

02 other. There needs to be some sort of physical
03 dimension of hugs or arm around the shoulder,
04 or whatever it is.

05 So healthy touch is a process or
06 processes that kind of start to introduce that
07 need that men have and show that, hey, look you
08 can actually get this need met in a way that
09 isn't sexual, in a way that, if it's done
10 right, can be safe and healthy and fulfilling.
11 And, quite frankly, it really is.

12 Q. Was that always in a group type
13 setting when done on a People Can Change
14 weekend?

15 A. Yes.

16 Q. Have you seen Alan Downing employ
17 healthy touch before?

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18 A. I have, yes.
19 Q. Has he done that with you?
20 A. Yes.

11. PAGE 31:22 TO 31:23 (RUNNING 00:00:03.497)

22 Q. Okay. Have you ever felt there was
23 anything inappropriate about it?

12. PAGE 31:25 TO 31:25 (RUNNING 00:00:00.658)

25 A. No.

13. PAGE 32:02 TO 32:05 (RUNNING 00:00:09.288)

02 Q. Did any of the plaintiffs ever
03 complain to you that they thought that any
04 healthy touch they may have experienced with
05 Alan Downing was in any way inappropriate?

14. PAGE 32:07 TO 32:14 (RUNNING 00:00:21.667)

07 A. Sorry. I got my microphone.
08 Q. Let me repeat the question.
09 A. Hold on. Let me just get this. All
10 right. We're good.
11 Q. I asked you if any of the plaintiffs
12 ever mentioned to you that they thought any
13 healthy touch they may have experienced with
14 Alan Downing was in any way appropriate.

15. PAGE 32:16 TO 32:19 (RUNNING 00:00:09.259)

16 A. Never.
17 Q. These processes are like exercises
18 or modalities? I mean, would that be another
19 way to describe them?

16. PAGE 32:21 TO 34:16 (RUNNING 00:01:41.966)

21 A. Can you repeat the question?
22 Q. Yeah. In case people aren't
23 familiar with the term "process," is this like
24 a particular exercise or method or something
25 like that?

00033:01 HOFFMAN

02 A. You know, in some cases, it was an
03 exercise or a process to introduce men and to
04 give them an opportunity to achieve, you know,
05 what we call healthy touch, but healthy touch
06 or the idea that there can be physical intimacy
07 became something that I allowed to be in my
08 world of just connection to men, if it's done
09 right, if it's done healthy.
10 And by that I mean that I had to
11 discover for myself that, with relationship to
12 other men, in relationship to other men,
13 having, you know, touch that's non-sexual can
14 be a real part of relationship, and I
15 discovered for myself that I am someone that's
16 very touchy. Touchy doesn't have to be sexual,
17 is another really important aspect of this.
18 Unfortunately, a lot of people
19 equate touch today with sex right away. My
20 understanding through this work and through
21 what healthy touch is, is that it's not always
22 that, unlike what I used to think or believe,
23 and that it's actually a component that can be
24 part of friendship.
25 So, yes, there were times where it

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00034:01 HOFFMAN
02 was processes. But to me, it's just like, this
03 is me.
04 Q. Right.
05 A. This is who I am. These are my
06 friends. I want to show them that I care about
07 them and love them through having my arm around
08 their shoulder or having a hug from them from
09 time to time. And some people would say, oh,
10 that's like healthy touch, but to me that's
11 just me being like myself.
12 Q. When I was asking about a process, I
13 didn't necessarily mean to confine it to
14 healthy touch.
15 For example, is there something
16 called psychodrama?

17. PAGE 34:18 TO 37:09 (RUNNING 00:02:34.104)

18 A. Oh, there's definitely -- are you
19 asking whether there are processes that don't
20 involve that?
21 Q. Yes.
22 A. Yes, of course. I mean, healthy
23 touch is an aspect of the work. There's so
24 many processes that don't involve necessarily
25 another person, but involve your own inner
00035:01 HOFFMAN
02 self-work, your own ability to dig deep. And
03 psychodrama is one of those that can require,
04 actually, a lot of different components with
05 people and with yourself.
06 Q. All right. Have you seen
07 psychodrama employed at People Can Change
08 weekends or even at JONAH?
09 A. Yeah, uh-huh.
10 Q. What have you seen in that context?
11 MR. McCOY: Which context?
12 Q. Let's go ahead with People Can
13 Change. What have you seen in the way of a
14 psychodrama type of process?
15 A. So, just for the record, I'm allowed
16 to speak about People Can Change weekend here,
17 right?
18 Q. Yes.
19 A. Because there's a confidentiality
20 agreement.
21 Q. I understand, but other people --
22 Rich Wyler talked about it, so I think we're
23 okay.
24 A. Yeah. Well, anyways, I mean,
25 psychodrama is -- it's called guts work on the
00036:01 HOFFMAN
02 JIM weekend, it happens twice, once on Saturday
03 and then on Sunday.
04 And in some ways, the guts work or
05 the psychodrama is kind of the climax of the
06 weekend for the individual, because it's
07 focused to one-on-one for the individual.
08 Whereas, a lot of the other processes are all
09 group oriented.
10 So an individual is able to get up
11 and have the full attention of the staff, and
12 be put through a process that, for them
13 specifically, instead of like a whole group
14 again, looks at a lot of their own wounding, a
15 lot of their own emotional issues that relate

DEPOSITION VIDEOS

16 to just a person's -- not necessarily unwanted
17 same sex attractions, but just life in general.
18 The belief is that, again, focusing
19 on wounding that don't relate to just one
20 specific thing, like same sex attractions, does
21 ultimately help a person move beyond the same
22 sex attractions, and psychodrama is an
23 excellent tool to help men look deeply at a lot
24 of those wounding, and fight through it in a
25 real active sort of way, in a way where there's
00037:01 HOFFMAN
02 a lot of men that are supporting you, and kind
03 of building the process for you so that you can
04 literally fight through an emotional barrier
05 instead of just talk about it and think about
06 it, but actually move through it and
07 emotionally express, so that there can actually
08 be greater clarity that a man receives on the
09 other end after they -- after you do that work.

18. PAGE 38:25 TO 39:02 (RUNNING 00:00:02.567)

25 Q. Is there a process called the
00039:01 HOFFMAN
02 gauntlet?

19. PAGE 39:04 TO 41:09 (RUNNING 00:02:16.200)

04 A. That is one aspect of psychodrama
05 that can be brought in. It's not a process
06 alone. It's a way that psychodrama can be set
07 up through something called the gauntlet, where
08 a person faces the gauntlet, which is usually a
09 line of men facing each other, holding their
10 arms together, so that repeating negative
11 messages that that individual has inside their
12 own mind that has been keeping them back, and
13 they kind of form this wall, and they -- and
14 these men who are building that process will
15 say the messages so that the person themselves
16 can literally fight through that wall and break
17 the wall, and it's a symbolic representation of
18 kind of cutting down those messages with the
19 help of these men acting as them, and then
20 getting to the other side and sometimes
21 grabbing a sense of masculinity, or it can be
22 any symbol. There's -- I'm sure some of the
23 symbols have been discussed here, actually, but
24 it doesn't have to be one specific symbol. It
25 can be anything. It can be fighting a bully.
00040:01 HOFFMAN
02 Like I actually had a gauntlet where
03 I literally had a bully that I faced in camp
04 several years in a row, and I kind of like
05 wrestled him off my carpet. And it felt
06 amazing, because I fought through those
07 negative messages I received from the bully,
08 and then I finally faced him, and had like a
09 wrestling match, obviously, one that was safe
10 and contained, to get him off my carpet.
11 And then I felt extremely like fine,
12 and I faced these messages. I got to the other
13 side. I feel awesome now. And I was able to
14 learn a lot more my about my own empowerment,
15 myself, my own identity.
16 That was actually my first
17 psychodrama. And I remember it very
18 distinctively, and it's been with me to this

DEPOSITION VIDEOS

19 day. It's been quite awesome, actually.
20 Q. Do you know if they used nudity in
21 any processes at any of the People Can Change
22 weekends you've attended?

23 A. I know that that could have been
24 something where a man needed to go in certain
25 psychodrama processes several years ago, they
00041:01 HOFFMAN
02 were more -- they allowed for it more, but then
03 after a lot of the controversy and the ways
04 that people can malign that idea, they've --
05 they've brought up those processes much less on
06 People Can Change weekends.
07 Q. All right. Do you know if Chaim
08 Levin participated in any such exercise on any
09 People Can Change weekend you have attended?

20. PAGE 41:11 TO 42:20 (RUNNING 00:01:29.333)

11 A. Not on a People Can Change weekend.
12 Q. Do you know if he did on a New
13 Warrior weekend?

14 A. Yes, I do know that he did that.

15 Q. What's a New Warrior weekend?

16 A. A New Warrior weekend is a weekend
17 retreat similar to the JONAH and JIM workshops,
18 but that offer processes and empowerment
19 exercises, and everything similar to what I
20 have discussed, to men that -- from a wide
21 range of issues that they're struggling with,
22 not strictly related to unwanted same sex
23 attractions.

24 In fact, they have a lot of gay
25 identified men on those weekends that are also
00042:01 HOFFMAN
02 fighting through their own issues with
03 whatever -- with whatever it might be.
04 It's a weekend that really focuses a
05 lot on finding the warrior within for a man,
06 like finding their power, their ability to draw
07 boundaries and to be really kind of a
08 brotherhood in the process with other men it's
09 a pretty empowering weekend.

10 Q. So it's your understanding that a
11 gay identified man can go to a New Warrior
12 weekend even if they have no desire to --

13 A. A hundred percent --

14 Q. I have to finish the question.

15 A. I'm sorry.

16 Q. My question was, is it your
17 understanding that the gay identified man will
18 sometimes go to new warrior weekends even
19 though they have no concern about overcoming
20 any unwanted same sex attractions?

21. PAGE 42:22 TO 43:18 (RUNNING 00:00:51.034)

22 A. Yes, a hundred percent.

23 Q. Did Chaim Levin discuss with you his
24 experience with the nudity process on the New
25 Warriors weekend?

00043:01 HOFFMAN
02 A. Yes, he did.
03 Q. What did he tell you in that regard?
04 A. We spoke about it after I went on my
05 own weekend, because he was careful not to
06 divulge the confidentiality of the New Warriors
07 weekend, but he pretty much loved it. He

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08 thought it was extremely empowering.
09 He had an amazing time on the
10 weekend itself, and thought that aspect of the
11 weekend was incredibly affirming for himself
12 and created a very strong sense of brotherhood
13 among -- among the men that he was with, and
14 this is what I recall in a conversation with
15 him about the weekend.
16 Q. Did he ever share with you any of
17 his thoughts or impressions about the People
18 Can Change weekend he attended?

22. PAGE 43:20 TO 45:11 (RUNNING 00:01:32.736)

20 A. Yes. Yes, definitely.
21 Q. What did he say in that regard?
22 A. He loved the weekend, from my
23 recollection, and I remember very clearly
24 him -- first of all, I was on the weekend with
25 him, his first one, and he was -- he was having
00044:01 HOFFMAN
02 an amazing time from what I recall.
03 He was definitely being pushed to
04 fight through a lot of his own wounding, but he
05 was coming up victorious, from my judgment,
06 every time and loving it.
07 He loved People Can Change. He
08 loved the weekend itself. He loved all the
09 staff that were there. He liked it so much
10 that he went a second time several months
11 later. I don't recall how long it was, but
12 just kind of recharge himself, I believe,
13 after -- after kind of the first time sort of
14 perhaps wore off.
15 I don't really know exact reasons as
16 to why he went, but my understanding was that
17 he just really wanted to be back in that
18 environment again. And I couldn't blame him.
19 I loved the weekend myself. So he went back
20 for a second time.
21 And then I remember speaking to him
22 after he got back, too, and how he created
23 amazing friendships with people and bonded
24 again, and set out in the fields like looking
25 at the stars and laughing and talking with
00045:01 HOFFMAN
02 people. I remember the conversation.
03 He really -- he really benefited
04 from it, and you could hear it in his voice and
05 just sort of, yeah, how much he really was
06 getting out of it, and I definitely understood
07 why.
08 Q. Did he ever share with you,
09 individually or in a group, and you mentioned
10 wounding, what wounding he had experienced in
11 his life?

23. PAGE 45:13 TO 46:19 (RUNNING 00:01:37.967)

13 A. Yeah. We were close friends back
14 then, and he shared a lot of the wounding that
15 he struggled with.
16 Q. Can you tell us what some of that
17 was?
18 A. Well, one of the wounding which he
19 discussed openly like on the Listserv, JONAH
20 Listserv, was his unfortunate sexual abuse that
21 he went through with one of his cousins, which

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22 is obviously wounding for anyone.
23 And if I recall, we spoke a lot
24 about his own wounding around friendships and
25 being able to feel like he can connect deeply
00046:01 HOFFMAN
02 to other men, and finding love and support and
03 getting affirmation both from other men and
04 within himself. Just typical stuff I actually
05 struggled with.
06 There's also a lot of wounding, if
07 you want to call it that, again, around his
08 family, unfortunately. He -- from what I
09 recall, his father wasn't supportive as a
10 father, and his brothers as well were very
11 rejecting toward him.
12 And I felt really bad about it,
13 because I don't really relate to that sort of
14 wounding personally in terms of family, father
15 issues and brother. So it was understandably
16 very difficult for him to have a father that
17 was rejecting, a father that wasn't loving and
18 brothers as well, and I think it did permeate
19 into his journey.

24. PAGE 47:03 TO 47:13 (RUNNING 00:00:22.667)

03 Q. Did you have any of these same types
04 of processes at the JONAH offices?
05 A. Repeat the question or clarify.
06 Q. Well, we talked about some of these
07 processes, healthy touch, psychodrama,
08 gauntlet.
09 Were those also done sometimes
10 through the JONAH offices?
11 A. Yes.
12 Q. Did you feel they were as beneficial
13 at JONAH as you described at People Can Change?

25. PAGE 47:15 TO 48:03 (RUNNING 00:00:30.633)

15 A. Certainly.
16 Q. Let me re-ask it in light of the
17 objection.
18 What was your impression of the
19 impact those processes had on you when you
20 experienced them at JONAH?
21 A. Very positive. Just as positive as
22 having them on any of the workshops and
23 weekends that I attended.
24 Q. Was there any type of process at
25 People Can Change or JONAH that involved
00048:01 HOFFMAN
02 striking a pillow with a tennis racket or
03 baseball bat, anything like that?

26. PAGE 48:05 TO 49:15 (RUNNING 00:01:25.696)

05 A. Yes.
06 Q. Describe that. What's the purpose,
07 to your understanding, of that?
08 A. Yeah. So, usually, the purpose of
09 those processes is to process a deep,
10 suppressed anger that a person might be having
11 around an incident in their life. It can be a
12 number of things.
13 You know, we all go through life and
14 develop anger around what might have occurred
15 to us and a lot of the times we stuff it in,

DEPOSITION VIDEOS

16 and we keep it locked up, and it can start
17 coming out sideways.
18 It can start -- the anger can be
19 expressed on individuals. It can actually be
20 damaging to one's self or to others. These
21 processes, however, they show another way out
22 of getting rid of that anger, which is through
23 a healthy, safe way of releasing it, getting in
24 touch with that incident to a degree so you can
25 then feel the anger, processing it through a
00049:01 HOFFMAN
02 healthy release, whether it be hitting a
03 punching bag with a bat, whatever it is, any
04 way where a person can finally actually let
05 their body do what it needs to do to get out
06 that anger instead of keeping it locked in and
07 suppressed in a way that would be very
08 disruptive and unhealthy.
09 Q. Okay. I think you indicated you
10 staffed some of these People Can Change
11 weekends?
12 A. Yes, I have.
13 Q. All right. Was there any part of
14 the instruction or training that involved
15 reference to a higher power?

27. PAGE 49:17 TO 51:10 (RUNNING 00:01:55.300)

17 A. Certainly, I think it's an important
18 aspect of the work, having this idea that it's
19 not all on my shoulders, that I actually have a
20 higher power or a God looking out for me, and
21 providing me with the tools to -- to move
22 beyond my struggles.
23 There's something very comforting
24 about even the idea that the challenges that
25 are presented to me come from a higher power,
00050:01 HOFFMAN
02 because then I can create a perspective about
03 them that says, yes, these are challenging and
04 these are tough, this is a tough situation that
05 I'm in, but they are given to me by a higher
06 power for the purpose of me growing, for the
07 purpose of me looking at these challenges and
08 facing them and coming out stronger on the
09 other side.
10 So having a higher power is
11 incredibly encouraging and incredibly affirming
12 and a strong aspect of this work, although,
13 again, never, the work itself, the whole work
14 is encapsulated under God and religion, and I
15 think it's a really important distinction to
16 make about this work because there are a lot of
17 works out there that are like that, pray it
18 away, and therapies and prayer is like one of
19 the most intense part of this work, but that's
20 not at all what I experienced with JONAH and
21 People Can Change, Alan.
22 And I think it's an extremely
23 important distinction to make because I think
24 we see far too many times just how much a
25 person misses when they only focus on the
00051:01 HOFFMAN
02 spiritual dimension and don't finally as well,
03 in addition to that, dig deeper at their own
04 emotional issues that they may carry throughout
05 life.

DEPOSITION VIDEOS

06 Q. We have talked about several of
07 these various processes.
08 Did anyone ever tell you that any
09 one of these processes was intended to help
10 turn people from gay to straight?

28. PAGE 51:12 TO 53:19 (RUNNING 00:02:25.100)

12 A. That would be a very simplistic way
13 of putting this work, and I've never heard
14 that, and understandably so. It's almost
15 laughable, to be quite honest, that one process
16 would be able to change a person from gay to
17 straight.

18 Q. What's your understanding of the
19 processes in the aggregate, if not to help
20 people transition from gay to straight or
21 overcome, you know, same sex attractions?

22 A. My understanding is something that I
23 have already kind of touched on already, which
24 is that it's a process. It's a journey, that
25 there's no light switch. There's no off and on
00052:01 HOFFMAN

02 button that, you know, by going to this weekend
03 or having this one process, you're all of a
04 sudden going to become gay to straight.

05 It's -- it's a journey. It's a
06 journey that requires, you know, commitment,
07 work, a desire to stay committed to it, even
08 when it doesn't seem to be working all the
09 time.

10 Because it's not supposed to always
11 be a hundred percent success, with each
12 process, that it's going to make a difference.
13 I think it's a journey where there's often two
14 steps forward, one step back, two steps
15 forward, one step back. I've definitely had
16 that share of having steps back -- step backs,
17 but that's the journey.

18 The journey is, the way I understood
19 it, is that it's all about a commitment -- I
20 guess, again, a journey. It really is a
21 journey. It's a journey that can last -- in
22 some ways, I think it's a journey that's going
23 to be part of the rest of my life, obviously,
24 to different degrees.

25 And at the beginning, it was -- it
00053:01 HOFFMAN

02 was all about same sex attractions. Today,
03 it's about a lot more, I guess, things related
04 to marriage and to my family and being a father
05 and a husband that don't really relate to same
06 sex attractions anymore. I consider the
07 journey to be really comprehensive to my whole
08 entire life, not just one thing, anyways.

09 But there's no gay to straight,
10 essentially. There's no -- that never was
11 passed down to me through JONAH or through
12 People Can Change. It was very much like this
13 is something that you're going to work toward
14 and you stay committed to, and something that
15 can be possible. And we're here for you, and
16 we're going to encourage you to follow whatever
17 dream you choose.

18 Q. Was Arthur encouraging or
19 supportive?

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29. PAGE 53:21 TO 55:03 (RUNNING 00:01:15.634)

21 A. Of course. I mean, if he felt that
22 these are my values of overcoming my same sex
23 attractions, then I would hope that he would be
24 encouraging and supportive of going toward what
25 I want.

00054:01 HOFFMAN
02 Q. You mentioned you had been a staff
03 person.
04 Was that something you did for pay
05 or without pay?
06 A. Without pay.
07 Q. Why did you do that?
08 A. Because I believed very strongly in
09 this work. I'm very passionate about it. I've
10 seen the change, the effects not just on
11 myself, but on a lot of men, and I feel like
12 there's not enough resources out there for men
13 to really effectively do this work.
14 There's a lot of, unfortunately,
15 unhealthy ways to try to overcome this work,
16 this unwanted same sex attraction that we've
17 heard too much about. And this is very much
18 not what we hear about.
19 This is, in my opinion, a very solid
20 and effective way of overcoming the unwanted
21 same sex attraction, and I have a strong
22 passion to give that over to the men who really
23 seek it, who really want it, and to provide the
24 truth of what it is to those men, yeah.

00055:01 HOFFMAN
02 Q. Were the counselors at People Can
03 Change unlicensed, do you know, for the most
04 part?

30. PAGE 55:05 TO 56:07 (RUNNING 00:01:10.300)

05 A. I'm sure there were some -- I think
06 it was mixed. There were some licensed
07 therapists. I think there might have even been
08 a couple of psychologists there at certain
09 times that I've staffed, but sometimes not.
10 It's a volunteer organization. It's
11 all about -- I think men -- actually, I know
12 that men are told, before they go, that this is
13 a volunteer self-help organization similar to
14 Alcohol Anonymous, where it's all just men
15 coming together and trying to help men get past
16 struggles together that they might be
17 struggling with as well.
18 So you can have some licensed
19 therapists there. You may not. It's not
20 really made to be a therapy organization from
21 what I understood.
22 Q. Do you know if that's basically the
23 same approach as far as New Warriors is
24 concerned?
25 A. Yeah, definitely.

00056:01 HOFFMAN
02 Q. Did you ever see or experience, in
03 any of your participation in JONAH or People
04 Can Change, anything that might be considered
05 what's called aversion therapy, where people
06 are being punished through any type of a
07 physically painful experience?

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31. PAGE 56:09 TO 57:02 (RUNNING 00:00:42.900)

09 A. If you're talking about aversion
10 therapy, where you look at a picture and then
11 get shocked --
12 Q. Right.
13 A. -- or anything ridiculous like that,
14 then I mean, no.
15 Q. Okay.
16 A. Yeah, that was -- that's kind of
17 what I was alluding to before, that there are,
18 unfortunately, a lot of unhealthy resources
19 that do harm people, that do hurt others, and
20 I'm really against them. And that we need more
21 of what we get at JONAH and at JIM, and that's
22 why I have a passion toward helping men --
23 Q. Did you ever see anybody at JONAH or
24 JIM wearing rubber bands that they were told to
25 snap on their wrist or anything like that in
00057:01 HOFFMAN
02 order to prevent unwanted same sex attractions?

32. PAGE 57:04 TO 57:04 (RUNNING 00:00:02.400)

04 A. No, definitely not.

33. PAGE 57:21 TO 57:23 (RUNNING 00:00:10.934)

21 Q. Did you ever experience or see other
22 men at JONAH experience being shamed or made to
23 feel guilty as part of the program?

34. PAGE 57:25 TO 62:21 (RUNNING 00:05:27.025)

25 A. I don't know how that would even fit
00058:01 HOFFMAN
02 into like what the program is all about. The
03 program is about helping men overcome shame and
04 not feel guilty and become empowered and become
05 more in touch with their identity and selves.
06 Again, if anything, getting a person
07 to maybe reexperience past shame and past guilt
08 might be something that needed to be done, but
09 only for the sake of overcoming it. And every
10 time I was present at such processes, that's
11 exactly what happened.
12 And the goal is to empower, to
13 overcome these very negative and destructive
14 forces called shame, toxic shame or guilt that
15 brings a person down and keeps a person feeling
16 unworthy or devalued.
17 Q. Did you ever help staff any JONAH
18 Shabbatons?
19 A. Yeah. I staffed at least three of
20 them, I think.
21 Q. And once again, were you paid or
22 unpaid?
23 A. Not paid.
24 Q. Okay. And you do it for the same
25 reasons?
00059:01 HOFFMAN
02 A. A hundred percent, yes.
03 Q. Did you staff any other types of
04 these weekends we have talked about other than
05 People Can Change or JONAH weekends?
06 A. There is another weekend called the
07 Nobleman weekend that's, again, it's not for
08 men who struggle with same sex attractions

DEPOSITION VIDEOS

09 alone. It's actually staffed by women, but
10 they have men helping out, but the women
11 primarily run the processes and I have staffed
12 that weekend.

13 I think that's it.

14 Q. Okay. What were the kinds of wounds
15 you felt you experienced in your life that led
16 you to want to seek out JONAH and Mr. Downing
17 for help?

18 A. So I discovered very clearly that
19 the wounds that were really requiring this
20 journey was wounds definitely related to peers,
21 to peer bullying, feeling like I don't really
22 fit in among my friends or among the cool guys,
23 the way I defined cool.

24 I never felt before, this work,
25 really adequate as a man, because of those peer
00060:01 HOFFMAN
02 wounding, because of me not feeling I could fit
03 in.

04 I also had some body image issues.
05 I never thought that I was attractive before
06 this work. I hated myself for being skinny and
07 having a high pitched voice before this work.

08 I had slight mother enmeshment
09 issues that I had to work past, but that wasn't
10 as severe as really the peer aspect of things.

11 I was also very much lacking within
12 the peer world intimacy, you know, closeness
13 and deep connection. I had very superficial
14 friendships with other men that weren't really
15 fulfilling on a sort of a friendship emotional
16 level, and that was something I really needed.

17 I had addictive behavior, I would
18 say before this work, looking for escapes from
19 pain, pain that related to what I just
20 discussed, you know, not having friendships and
21 whatnot.

22 Q. What are the addictive -- I realize
23 some of this stuff is kind of sensitive. I
24 apologize for that, but it feels necessary, and
25 I'm sure opposing counsel will be asking, so I
00061:01 HOFFMAN

02 need to ask.

03 What are some of the types of
04 addictive behaviors that you're talking about?

05 A. Again, I think I mentioned this
06 already, but porn and masturbation and acting
07 out with men very quickly and easily through
08 online hookups and so it was just, yeah, stuff
09 like that.

10 Q. Okay. What did Mr. Downing do to
11 try to help you overcome these wounds or
12 addictive behaviors you mentioned?

13 A. So Alan Downing was really good at
14 helping me get to the heart of what these
15 behaviors were being driven by. For example,
16 with peers, I would look at the messages about
17 myself in relation to how I was defining other
18 men when I was younger, and how I felt very
19 distant from them, and Alan would help me get
20 in touch with that disconnect of how I defined
21 myself versus how I define other men and
22 noticing how different that was. I couldn't
23 define myself as a man.

24 So we would then look at that and

DEPOSITION VIDEOS

25 process it and get in touch with the emotion
00062:01 HOFFMAN
02 that I might have around that dichotomy, that
03 disconnect, and then releasing that emotion to
04 finally feel empowered and no longer held back
05 by the negativity and then adopting a new
06 perception of myself with that new emotion that
07 I had of being able to fight through it, which
08 is usually a sense of empowerment or joy.
09 So Alan would help me look at that
10 joy and feel it and get in touch with it, and
11 then adopt a new way of defining myself. And
12 that new way of defining myself was usually
13 more in line with how I should and can define
14 men.
15 So that's just an example. There's
16 many different aspects of my work that involve
17 the same sort of idea, more or less.
18 Q. Okay. Did Mr. Downing ever try to
19 use any blaming, blaming you or blaming your
20 parents for anything that you were unhappy
21 about yourself?

35. PAGE 62:23 TO 65:03 (RUNNING 00:02:11.967)

23 A. Definitely not. One of the key
24 things about all of this work was that it was
25 my responsibility for creating the judgments
00063:01 HOFFMAN
02 and perceptions I had about myself and about
03 other men. Even if other men were bullying me,
04 and that's what gave me my perceptions about
05 myself, I don't blame the other men. I don't
06 keep myself in sort of like that victim
07 mentality, that it's all the other men's fault,
08 that they said these things about me, and that
09 I, therefore, feel that way about myself.
10 Rather, what I do is I recognize
11 that that bullying enabled me to then tell
12 myself negative stories, and I made that
13 choice, even though I was young and I maybe
14 didn't have any other way of processing it, but
15 I still made that choice as a young individual
16 to tell myself the negative stories after being
17 bullied.
18 So when I'm able to switch things
19 around and recognize that, really, everything
20 was my responsibility, that also gives me the
21 power to then change that which I created. If
22 I rather -- like put all the responsibility on
23 other people, though, like the bullies on the
24 playground, then I have to basically force
25 myself to try to change the bullies, which is
00064:01 HOFFMAN
02 nearly impossible, because they might always
03 bully me, and what am I supposed to do then?
04 Be a victim to it?
05 So this work was very much about
06 empowering and not blaming anyone, because that
07 keeps a person stuck in a victim state. And I
08 very much was there at one point, and now I'm
09 very much trying to move beyond that and I feel
10 like I have moved beyond that with success as
11 well.
12 Q. Good. Thank you.
13 Was there any particular process
14 that Mr. Downing used to help you overcome any

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15 body imaging type issues?
16 A. Yeah.
17 Q. What was that?
18 A. There's the process that's been
19 discussed I know from this lawsuit, the
20 exercise where you stand in front of a mirror
21 and you see yourself. I don't know what you
22 want to call it.
23 Q. Was there nudity involved?
24 A. Yes. Nudity by choice of my own,
25 so.

00065:01 HOFFMAN

02 Q. Did you feel pressured at all to
03 engage in that exercise to its completion?

36. PAGE 65:05 TO 67:14 (RUNNING 00:02:26.000)

05 A. The completion of the exercise is
06 very much dependent on myself, and how far I
07 would want to take it. No, I didn't. I didn't
08 feel pressure.
09 Q. Okay. What did it involve? Can you
10 briefly describe it?
11 A. So this exercise very much
12 involved -- it was important for, first of all,
13 overcoming body shame, and allowing myself, at
14 the same time, to feel comfortable with myself
15 in a very vulnerable place. And one of the
16 most, I think, effective ways for a man to
17 become vulnerable with himself is to be able to
18 see themselves without any of the walls or
19 clothing that they kind of put over their body
20 that kind of hide them from the world.
21 Clothing can be a physical piece of
22 cloth, but it can also be a symbolic
23 representation of the different ways we like to
24 hide ourselves, and kind of identify perhaps
25 with a brand or logo or whatever. So this

00066:01 HOFFMAN

02 process was all about shedding these external
03 identifications, and being able to just see
04 one's self completely vulnerable, and honor
05 that, and be empowered by it and to get in
06 touch with it.
07 So if it was my choice, which it was
08 when I did the process, I would slowly remove
09 an article of clothing. Each clothing
10 represented, usually, a negative perception I
11 had about myself, particularly related to my
12 body or my own vulnerability, and I would
13 remove it all until I felt very vulnerable with
14 myself.

15 And for me, what was comfortable at
16 the time was to be completely vulnerable
17 through nudity, through being completely naked
18 in front of a mirror and looking at myself and
19 seeing my body and then being able to honor it
20 and to -- through the shedding of the negative
21 messages, which were the clothes, to then put
22 my clothes back on after getting to that place
23 and putting a new message to the clothes, like
24 you're powerful, you're masculine, and then
25 putting the clothes back on after getting to

00067:01 HOFFMAN

02 that vulnerable state and feeling so at peace
03 with myself and my body, that I would actually
04 say that that process, in itself, was one of

DEPOSITION VIDEOS

05 the most transformative and, yeah,
06 transformative processes that I went through in
07 a very short amount of time, simply by being
08 with -- just by having one session.
09 I think that's very unusual for one
10 session in any sort of life coaching or
11 therapeutic setting.
12 Q. Did Mr. Downing ask you, during that
13 process at all, to touch your private parts at
14 all?

37. PAGE 67:16 TO 67:18 (RUNNING 00:00:06.700)

16 A. He would never, no, no.
17 Q. Did you feel there was anything
18 sexually inappropriate about that exercise?

38. PAGE 67:20 TO 67:23 (RUNNING 00:00:16.389)

20 A. I did not.
21 Q. Did anyone at JONAH ever refer to
22 homosexuality as a mental disease or mental
23 defect?

39. PAGE 67:25 TO 68:06 (RUNNING 00:00:26.433)

25 A. No.
00068:01 HOFFMAN
02 THE WITNESS: Sorry.
03 A. No. I never experienced that.
04 Q. In terms of your experiences when
05 you came to JONAH, had you -- well, have you
06 ever identified your sexual orientation as gay?

40. PAGE 68:08 TO 68:18 (RUNNING 00:00:31.804)

08 A. No. I never identified myself as
09 gay, even when I was acting out or having
10 strong behaviors and feelings that were clearly
11 gay, if you want to call them that.
12 Q. Okay. Prior to going to JONAH, say
13 we take a scale of one to ten, where one would
14 be minimal same sex attraction and ten being
15 what you consider, you know, obsessive or out
16 of control same sex attraction, before going to
17 JONAH, how would you rate your same sex
18 attraction?

41. PAGE 68:20 TO 68:25 (RUNNING 00:00:17.266)

20 A. Between nine and ten, especially ten
21 when I was in my very addictive state of
22 constantly acting out and looking for men to be
23 with in that way.
24 Q. How would you rate your same sex
25 attraction now using the same scale?

42. PAGE 69:03 TO 70:13 (RUNNING 00:01:27.967)

03 A. Between zero and three or four,
04 depending on how well I'm implementing the
05 tools and the resources into my everyday life.
06 One of the biggest differences,
07 though, is that -- I would say it's zero most
08 of the time. Like I'm able to see men, and if
09 they're attractive, I can say, oh, that man is
10 handsome, but I don't take it to a place of,
11 oh, therefore, I must be sexual with him, which
12 is what I kind of consider the attraction to be
13 defined as, really.

DEPOSITION VIDEOS

14 And it's zero most of the time. I
15 don't have that need anymore, and I'm very
16 comfortable with that. But if I start to
17 neglect myself, if I start to, again, redefine
18 myself very different than other men, and feel
19 like I'm not getting the intimacy that I need
20 from other men, and that can still happen
21 sometimes today, especially if life gets tough
22 or whatever, I can experience the attraction
23 become, you know, up to, I would say, three or
24 four, like I said.

25 But the biggest difference is, and
00070:01 HOFFMAN
02 this is something I think that's really
03 significant and really awesome about the work,
04 is that I don't always, therefore, have to take
05 it to an action level. I don't have to,
06 therefore, act out. And I have tools now.
07 That's the most important thing, is
08 I actually have resources and tools to help me
09 bring it back down to zero, and -- yeah, and I
10 think that's an incredible thing.

11 Q. Have you avoided acting out with
12 other men during the course of your marriage?
13 A. Yes.

43. PAGE 70:15 TO 70:17 (RUNNING 00:00:08.933)

15 Q. Do you consider yourself, you know,
16 happier now that you are employing those
17 techniques, living your life the way you are?

44. PAGE 70:19 TO 71:04 (RUNNING 00:00:27.367)

19 A. A hundred percent happier, yeah.
20 Fulfilled and happier. It's many good things.
21 Q. All right. I want to talk about
22 your knowledge of the three plaintiffs you
23 mentioned that you know.

24 While Mr. Levin was in the program
25 and you were still friends with him, did he
00071:01 HOFFMAN
02 ever complain to you about Alan Downing or
03 JONAH?
04 A. No.

45. PAGE 71:06 TO 71:08 (RUNNING 00:00:06.500)

06 Q. Did he share with you his thoughts
07 about Alan Downing or JONAH while he was in the
08 program with you?

46. PAGE 71:10 TO 72:14 (RUNNING 00:01:17.480)

10 A. Very positive. He loved Alan
11 Downing a lot, like he was a very big fan of
12 his. He felt that Alan was probably one of the
13 best people, from my judgment, again, to help
14 men with this.
15 He loved him so much that even when
16 we had a discussion about him wanting to stop
17 doing the work that JONAH suggested and go be a
18 gay individual, which was in 2008, I think he
19 even -- I recall pretty clear that, in the
20 conversation, he still said something to the
21 effect, I'm still -- I still love JONAH. I
22 still love Alan Downing. They're still my
23 biggest fans, but I just want to go try and do
24 this.

DEPOSITION VIDEOS

25 He was very in favor of JONAH and
00072:01 HOFFMAN
02 Alan. So much so that I think he even, a
03 couple times, went to speak on behalf of JONAH
04 to certain schools. I think he might have
05 even, if I recall, one of them being Shore
06 Yashuv, which is a school in Queens, or maybe
07 he was about to.
08 But regardless, he was very
09 passionate about, when I knew him, Alan and
10 JONAH, and this work and very, very positive
11 about it.
12 Q. Did he mention to you whether he
13 went through the same nudity exercise that you
14 described with Alan?

47. PAGE 72:16 TO 73:07 (RUNNING 00:00:46.233)

16 A. So it must have been a -- yes, a day
17 or maybe a week after -- between a day and a
18 week, I don't really remember the time frame we
19 discussed it in the context of me going through
20 it as well, and we kind of shared our
21 experiences.
22 Q. What did he tell you about his
23 experience?
24 A. Very positive, very empowering, very
25 uplifting, awesome, like very enthusiastic
00073:01 HOFFMAN
02 about it. He was. Chaim is a very
03 enthusiastic guy, and -- I think. And he
04 was -- we kind of laughed and talked about the
05 awesomeness of that exercise together at one
06 point, and just very, again, positive, positive
07 feelings around that.

48. PAGE 74:16 TO 75:09 (RUNNING 00:00:41.967)

16 It was pointed out to me that I
17 misspoke on a prior question before the
18 break, so I need to repeat that so the
19 record is clear.
20 BY MR. LIMANDRI:
21 Q. My question was intended to be if
22 any of the plaintiffs ever mentioned to you
23 that they thought there was any
24 inappropriate -- anything inappropriate about
25 the healthy touch that Mr. Downing may have
00075:01 HOFFMAN
02 used with any of them. I used the word
03 "appropriate." I meant to say inappropriate,
04 so let me reask it one last time.
05 Was there anything that any of the
06 plaintiffs ever mentioned to you that, whether
07 there was anything inappropriate about
08 Mr. Downing ever using healthy touch with any
09 of them?

49. PAGE 76:14 TO 77:17 (RUNNING 00:01:29.266)

14 Q. One other thing with Mr. Levin and
15 we will move on to Mr. Unger.
16 Did you continue to be friends with
17 Mr. Levin for sometime after he left JONAH and
18 Mr. Downing as a client?
19 A. Yeah, I very much wanted to. I'm
20 the type of guy -- I personally consider myself
21 the type of guy that wouldn't reject a person

DEPOSITION VIDEOS

22 for making a choice that goes against mine, and
23 I mentioned it before, that we had a phone call
24 around the time that he left. It was in the
25 fall of 2008.

00077:01 HOFFMAN
02 He was discussing with me his desire
03 to -- to be gay, and in the phone call, I
04 expressed some concern at the choice that he
05 was making, but ultimately I said to him, and I
06 can recall very clearly that I'm still going to
07 be here for you. I'm still your friend. I
08 still love and care about you, and I consider
09 you a brother, and I know that you have to do
10 whatever you feel like you need to do.
11 And my hope was that he would
12 maintain the same sort of feeling toward me.
13 Q. Okay. In the course of your
14 continued discussions with Mr. Levin after that
15 point, did you have -- well, did you
16 communicate by e-mails as well or on the
17 internet as well as by verbal conversations?

50. PAGE 77:19 TO 79:16 (RUNNING 00:01:41.495)

19 A. When? After he left?
20 Q. Yes.
21 A. Yes, definitely. Uh-huh.
22 Q. I'm going to show you one of two
23 documents I brought to mark as an exhibit
24 today, which I am marking as Exhibit 1 to this
25 deposition transcript.

00078:01 HOFFMAN
02 (Hoffman Exhibit 1, Printout of
03 Conversation Between Chaim Levin and
04 Jonathan Hoffman, marked for
05 identification.)
06 A. Yeah.
07 MR. McCOY: Chuck, the highlighting
08 is yours?
09 MR. LiMANDRI: It is. I did the
10 highlighting, because I want to call your
11 attention to this one particular
12 statement. If you want to focus, for
13 other questioners on other stuff, that's
14 fine.
15 Q. What is exactly -- do you know what
16 form of communication it is?
17 A. This is either Facebook or GChat. I
18 believe it's Facebook.
19 Q. Do you know about when this
20 particular conversation, because there's not
21 dates, just times, took place?
22 A. This was right before the YouTube
23 videos that he released through Anveshan. I
24 think, actually, to be more clear, that there
25 is a big letter that he wrote, that he was

00079:01 HOFFMAN
02 going to submit to some sort of news
03 publication that would describe for the very
04 first time damage that he experienced through
05 JONAH, and particularly about the undressing
06 therapy, as you see I had a feeling about that.
07 Yeah.
08 Q. Is this entry at 10:12, is this a
09 communication you received from Chaim Levin in
10 that time frame?
11 A. Yep. Yep. Uh-huh.

DEPOSITION VIDEOS

12 Q. Other than on e-mail, did he ever,
13 or Facebook, did he ever tell you, in that time
14 frame, that he would never openly say that
15 reparative therapy doesn't work, that would be
16 very wrong of me?

51. PAGE 79:18 TO 81:03 (RUNNING 00:01:25.767)

18 A. Yeah. He said that, obviously here,
19 and he continued to affirm that with me in
20 person, over the phone. This was all before
21 the lawsuit.

22 And, yeah, this was Chaim's like
23 consistent statement that he sent to me to
24 show, again, what I felt would be somewhat of a
25 respect to what I'm doing, that he would never

00080:01 HOFFMAN

02 make such a black-and-white statement against
03 reparative therapy or whatever you want to call
04 this therapy, and that he would still respect
05 the way I'm going about my life.

06 Q. Okay. Good.

07 A. And I was very willing to give him
08 the same freedom.

09 Q. Let's talk about --

10 MR. McCOY: Mr. LiMandri?

11 MR. LiMANDRI: Yes.

12 MR. McCOY: Was this document
13 produced?

14 MR. LiMANDRI: We just got this from
15 Mr. Hoffmann, which is why it was not
16 previously marked as an exhibit, okay? So
17 I don't know why we hadn't got it
18 previously, but this came from him.

19 MR. McCOY: Okay.

20 MR. LiMANDRI: That's all I can tell
21 you. My clients did not have this
22 document to produce.

23 Q. As far as Mr. Unger is concerned,
24 did he ever express to you his feelings or
25 impressions about Alan Downing and JONAH while

00081:01 HOFFMAN

02 he was still a client of Alan Downing and
03 JONAH?

52. PAGE 81:05 TO 81:15 (RUNNING 00:00:32.600)

05 A. Yeah. We discussed it. Again, we
06 weren't as close friends as I was with Chaim,
07 but we had phone calls and conversations about
08 Alan and JONAH.

09 Q. What did he say in that regard?

10 A. Same as what I have been saying with
11 Chaim. Positive, affirming, he believed in the
12 work when I was friendly with him, very much
13 positively affected by it.

14 Q. Did that change sometime after he
15 left doing work with Alan Downing?

53. PAGE 81:17 TO 82:06 (RUNNING 00:00:40.934)

17 A. Yeah, apparently, it did change. I
18 discovered that there was a shift in his belief
19 and thought when he released the YouTube videos
20 related to Anveshan on Truth Comes Out dot org.
21 Apparently, he's saying something different
22 now.

23 Q. Were you surprised about that?

DEPOSITION VIDEOS

24 A. Yeah, very much so.
25 Q. All right. Let's talk about Michael
00082:01 HOFFMAN
02 Ferguson. Let me ask the same question I asked
03 with Mr. Levin and Mr. Unger.
04 Did he ever talk to you about his
05 feelings or impression towards JONAH and
06 Mr. Downing while he was still a client?

54. PAGE 82:08 TO 83:08 (RUNNING 00:01:02.600)

08 A. Yes.
09 Q. What did he say in that regard?
10 A. Positive. He very much believed in
11 the work, and found it to be truthful and
12 positive and affirming for him.
13 Q. Did his attitude change at some
14 point?
15 A. The first time I noticed a change in
16 attitude was when the lawsuit was released.
17 So, yes, apparently, it has.
18 Q. Had you talked to him about the time
19 of the YouTube video coming out with Mr. Unger
20 and Mr. Levin?
21 A. He sent me an e-mail, the last form
22 of communication, actually, that I had with
23 him, where he kind of gave me a heads up that,
24 look what Chaim and Benji are doing.
25 It was not exactly clear whether he
00083:01 HOFFMAN
02 was either pro or against it, but what was
03 clear in that e-mail, though, is that he still
04 was someone who like supported me or felt
05 positive toward me.
06 Q. All right. Were you also friends
07 with Mr. Ferguson when he was a client of Alan
08 Downing and JONAH?

55. PAGE 83:10 TO 83:16 (RUNNING 00:00:15.600)

10 A. I was friends, but the friendship
11 was a lot more complex. It wasn't necessarily
12 what I considered to be healthy.
13 Q. All right. Well, we'll get to that
14 in a minute.
15 Did Mr. Ferguson ever mention
16 whether he had any attractions to women or not?

56. PAGE 83:18 TO 88:22 (RUNNING 00:05:17.967)

18 A. Yes.
19 Q. What did he say in that regard that?
20 A. That he felt strong attractions
21 toward certain women. He had particular girls
22 that he was like sexually attracted to, that he
23 would show me pictures of on Facebook. He
24 would -- he would talk about all sorts of
25 attraction, not just emotional, but like even
00084:01 HOFFMAN
02 sexual, about other women that he felt he had.
03 Q. Okay. Now, you have mentioned a
04 couple of times that, at some point, your
05 friendship with Mr. Ferguson had some unhealthy
06 component.
07 What are you referring to in that
08 regard?
09 A. So, we were friends for a month
10 before all that happened. I met him through

DEPOSITION VIDEOS

11 a -- or staffed his JIM workshop, and he
12 initiated contact with me afterwards, and then
13 we became really close friends after that. I
14 would travel to see him a lot in New York, and
15 I would stay by him.

16 And the truth is, like the
17 relationship, on a whole, never was so healthy.
18 Like I was still -- still had a lot of my
19 wounds, particularly around like codependency,
20 something I still hadn't really worked through
21 a hundred percent yet, and I was also just
22 starting my journey, relatively. It was in
23 2008, and I started my journey really strongly
24 in 2007, so there was still -- no, excuse me --
25 yeah, it was 2008, the spring of 2008.

00085:01 HOFFMAN

02 Before that, like almost a year
03 before that, I went on my first JIM workshop.
04 So I was a year into this work, more or less,
05 and still had a lot to work through. That's
06 the way this journey works. Nothing changes,
07 again, you know, overnight.

08 And, unfortunately, after we
09 developed a friendship, a lot of my codependent
10 emotional neediness starting playing a part in
11 the friendship with him. So for a month, it
12 wasn't unhealthy, if you define unhealthy by
13 being sexual in nature. For the first month,
14 it was more like, oh, my gosh, you're my best
15 friend, like I don't need anyone else, like you
16 are my -- you are my guy.

17 And that already should have been a
18 red flag for me, but, again, I had to learn
19 this, perhaps, the hard way, if you want to
20 call it, but I kind of created him as like my
21 new best friend, and we hung out so much, and
22 like he became my sole friend, and I was
23 starting to reject other men, kind of other
24 friendships, and I really got emotionally
25 invested in that.

00086:01 HOFFMAN

02 And he also was responding. It
03 wasn't a one-sided relationship. We both
04 became very attached to each other.

05 And then I made a lot of mistakes.
06 I made a lot of mistakes during that time,
07 unfortunately. I didn't -- I didn't -- as a
08 staff member, I shouldn't have met with him
09 alone. I should have met with him with a third
10 party or in a public place, and I didn't do
11 that.

12 I let a lot of my wounds just come
13 out on him in terms of, again, the emotional
14 enmeshment, basically, slow progression, we
15 kind of started to blur the lines between
16 what's healthy and what's not.

17 Physically, we were very close. And
18 that was also a problem, is that our friendship
19 kind of just revolved around there being
20 physical intimacy and almost everything else
21 was sort of put to the side, including
22 emotional connection and openness.

23 It all started to become a lot more
24 physical, perhaps disproportionately to what
25 else there should be in a friendship.

00087:01 HOFFMAN

DEPOSITION VIDEOS

02 And then those lines started to get
03 blurry, and then like we felt so much love,
04 though, and so we kind of decided to flirt with
05 the idea of kissing each other, because that
06 may be the way of expressing love. And this
07 was, again, me in my very wounded, mistaken
08 state.

09 And we started doing that. And
10 that's -- like for two months after that, we
11 would flirt a lot with kissing, and then
12 arousing ourselves, and acting out through kind
13 of body rubbing until ejaculation. And there
14 was never full-out sex, thankfully.

15 The furthest it ever got were there
16 were a couple of occasions where we had some
17 oral sex. It was not healthy. Let's put it
18 that way.

19 Q. I'm sorry it's painful, but --

20 A. No, I don't mind talking about it.
21 I know that -- I know that it was a really
22 wounded time in my life, I consider it, and I
23 had to like learn a lot from that experience.
24 From the down, I -- from the fall, the way -- I
25 did consider it a fall, though, eventually the

00088:01 HOFFMAN

02 relationship fizzled out. I was too enmeshed,
03 and then also things got revealed to People Can
04 Change, and that really kind of put the
05 boundary around it, and I'm sure that will be
06 discussed more.

07 Q. Let me ask you this.

08 A. Yeah.

09 Q. Did you, at some point, bring these
10 issues to the attention of Mr. Downing?

11 A. Yeah, yeah. When I was a client of
12 his, it was being brought up. I was very
13 shameful about it. So I wasn't a hundred
14 percent always open, but it eventually became
15 very clear to him that there was unhealthiness
16 going on, and we started trying to figure out,
17 okay, like how do we move forward and proceed
18 with that.

19 Q. Did you have any intention to bring
20 it to the attention of People Can Change
21 yourself?

22 A. I did have the intentions --

57. PAGE 88:24 TO 90:18 (RUNNING 00:01:48.266)

24 A. I did have the intentions to bring
25 it to People Can Change, although it was -- I

00089:01 HOFFMAN

02 should have done it quicker. I made a mistake
03 with that as well, unfortunately.

04 And, eventually, someone else had to
05 bring it to their attention, because I,
06 unfortunately, did not, but I did have plans.
07 In my heart, I do believe I would have told
08 People Can Change and Rich Wyler.

09 Q. Okay. When Rich Wyler and People
10 Can Change found out, was there any fallout
11 from that?

12 A. From them?

13 Q. Right.

14 A. There was repercussions, you know.
15 There was -- there was a probation that I was
16 given under -- and the only way I would even be

DEPOSITION VIDEOS

17 allowed to be back into People Can Change as a
18 staff member was by showing proof or a clear --
19 clear sort of -- yeah, proof or evidence that I
20 really worked on it, that I learned from it, I
21 grew from it, and that I worked through it with
22 a therapist or a life coach.

23 Alan was the life coach that helped
24 me really work through it, and -- but there was
25 a year probation, and then after the year

00090:01 HOFFMAN

02 passed, I spoke to Rich extensively about
03 things. I showed him what I learned, and what
04 I gained. And he slowly let me back in. It
05 wasn't a quick letting back in, but he, you
06 know, he understood that people make mistakes.
07 I made a severe one.

08 And he eventually let me back in as
09 a very advanced staff member, which I'm very
10 thankful, because it showed that he and the
11 organization recognizes that this is not a
12 flawless journey, you know, that there's times
13 where we fall, and we can still accept people
14 back into the fold, but if you show a
15 determination to -- to be a safe person again
16 within the -- within the organization.

17 Q. Did Alan Downing help you work
18 through these issues, get back on track?

58. PAGE 90:20 TO 90:20 (RUNNING 00:00:02.033)

20 A. Yes, definitely, yeah.

59. PAGE 97:02 TO 97:05 (RUNNING 00:00:18.500)

02 Q. Just to finish up, have you kept in
03 touch with other people that went through the
04 program with you at JONAH with Mr. Downing
05 about the same time you went through it?

60. PAGE 97:07 TO 97:25 (RUNNING 00:00:59.030)

07 Q. Other than the plaintiffs?

08 A. Yeah, for sure. I have many, many
09 friends from this, from JONAH, from JIM. All
10 are on various different degrees of success and
11 movement forward. I have connections to men
12 who also decided not to, you know, proceed
13 anymore into JONAH and JIM, similar to how I
14 was describing what I wanted to keep up with
15 Chaim and even Benji, but I -- yeah, I kept up
16 with -- I don't -- yeah, I'm very open with my
17 friendship, and I really do try to maintain
18 friendship with people, even if they don't
19 coincide with my values, and, obviously, I met
20 a lot of men like that through this work.

21 Q. Are you aware of people that went
22 through the program at the same time you and
23 the other plaintiffs went through it who are
24 now leading lives other than as openly
25 homosexual men?

61. PAGE 98:04 TO 98:20 (RUNNING 00:00:45.034)

04 A. Yeah. I mean, we can even like look
05 at Alan Downing's group for an example. There
06 was about 10 or 11 participants for that year,
07 consistency that I had in the group, and I
08 think -- we looked through the list once, and
09 60 percent of them, around 60, 65 percent of

DEPOSITION VIDEOS

10 them are either married with children today or
11 looking to date, married without children or
12 just continuing this work.
13 So there are plenty of men out
14 there. There's a whole world of us that -- of
15 men who are using JONAH's resources, using
16 JIM's resources to live a life in accordance
17 with their values.
18 Q. When you say married or looking to
19 date, you're talking about with women?
20 A. Yeah, for sure.

62. PAGE 105:22 TO 106:14 (RUNNING 00:00:44.533)

22 Q. Why wasn't it an option in your mind
23 to be gay?
24 A. There is a very deep-rooted desire
25 in me that comes from a whole host of
00106:01 HOFFMAN
02 variables. I think just in myself, I didn't
03 think that this was something that would make
04 me happy.
05 I think my parents, in spite of a
06 lot of their own wounding that I witnessed,
07 modeled what a family is and I wanted a family
08 like them.
09 Religiously, I had important
10 religious beliefs that were motivating my
11 desire to change, but then just sort of beyond
12 all that, a deep inner core was just telling me
13 that this wouldn't be something that I would be
14 happy with.

63. PAGE 108:19 TO 109:25 (RUNNING 00:01:37.400)

19 Q. What does a flare-up of SSA mean to
20 you, thinking back to the last two years?
21 A. It means feeling a very strong
22 attraction to men that could be characterized
23 by acting out at times, never with another man.
24 I thankfully haven't done that, but having
25 flare-ups that look like -- I would say things
00109:01 HOFFMAN
02 like masturbation to porn between the past two
03 years, yeah.
04 It could have been more times. I
05 don't really, again, keep track. I would say
06 the past two years, I have had some falls
07 related to that, because I'm understanding the
08 question a little better.
09 Let's put it at, just so that there
10 is a complete clarity, like maybe 10 to 15
11 times, yeah. I just wanted to clarify that.
12 Q. And by acting out, you mentioned
13 pornography?
14 A. A couple times, yes. Yeah.
15 Q. What else might acting out include
16 thinking, again, over the last two years?
17 A. Well, masturbation, I consider to
18 be -- masturbation that includes fantasy, but
19 primarily pornography, I would say.
20 Q. By pornography, do you mean images
21 of men?
22 A. Yes.
23 Q. Have you ever looked at images of
24 women naked within the last couple of years?
25 A. No.

DEPOSITION VIDEOS

64. PAGE 112:06 TO 112:11 (RUNNING 00:00:17.551)

06 Q. Is kissing and cuddling acting out?
07 A. Kissing and cuddling -- kissing
08 would be. Cuddling, no.
09 Q. Why not cuddling?
10 A. Because I think cuddling can be a
11 healthy form of male intimacy.

65. PAGE 112:18 TO 113:11 (RUNNING 00:00:54.167)

18 Let me start with the first
19 question. What does it mean, gay lifestyle?
20 A. Gay identifying and acting on
21 feelings and behavior.
22 Q. What about that is --
23 A. In my nature?
24 Q. Is against your nature, yes.
25 A. What I was speaking to before, that
00113:01 HOFFMAN
02 at my core, beyond my family, beyond my
03 religion, at my core, I don't believe that
04 that's something that would make me happy.
05 Q. And what about it?
06 A. Acting out with men, having a
07 partner, looking at pornography on a regular
08 basis. And, yeah, masturbation and whatnot,
09 yeah.
10 Q. Are you opposed, for example, to gay
11 marriage?

66. PAGE 113:22 TO 113:23 (RUNNING 00:00:04.266)

22 A. I'm not opposed to gay marriage for
23 others. For myself, I am.

67. PAGE 115:02 TO 115:21 (RUNNING 00:00:56.767)

02 I meant by that -- that, as a single
03 man, I, at the time that I even started with
04 Alan, I had some attractions towards women, and
05 I liked them from an emotional place. I liked
06 them even to a physical degree, and that when I
07 would start dating, I would be confident and
08 secure in myself at doing so.
09 Q. You're bisexual?
10 A. I never really identified as any
11 orientation. So, no, I guess. Yeah.
12 Q. Still today, you don't identify as a
13 specific orientation?
14 A. I don't like making my identity an
15 orientation. I personally choose not to.
16 Q. Do you have any word at all
17 associated with your orientation -- identity at
18 all associated with --
19 A. Concerning my sexual orientation?
20 Q. Yes.
21 A. No.

68. PAGE 115:25 TO 116:09 (RUNNING 00:00:26.877)

25 Q. You are not heterosexual?
00116:01 HOFFMAN
02 A. Again, I just personally do not like
03 to identify my identity, I'm talking about my
04 core, you know, I identify as blank, anything
05 related to who I'm sexually attracted to.
06 I can tell you about my feelings and
07 behaviors, if you'd like, but in terms of my

DEPOSITION VIDEOS

08 identity, I do not -- I do not say
09 heterosexual, homosexual, bisexual.

69. PAGE 120:04 TO 121:07 (RUNNING 00:01:24.933)

04 Q. Going back for a second to something
05 you said earlier about now you have the tools
06 to deal with flare-ups of SSA.

07 A. Uh-huh.

08 Q. What specifically are those tools?

09 A. Well, everything that I have
10 discussed that JONAH has provided me, which is
11 the framework, the support for helping me
12 better define myself as a man, and ensuring
13 that my definition of men fit into who I am, as
14 well as ensuring that the connections between
15 other men that I -- that I need in my life are
16 being fulfilled. I have those friendships, and
17 I have the support to achieve all of that.

18 Q. These are ways for you to deal with
19 flare-ups and same sex attraction, your
20 connection with other men?

21 A. I would say that, as a result of me
22 not having connection to other men, which I
23 think is a prime need for pretty much everyone,
24 to a degree, then it's more likely that I could
25 have a flare-up, if you want to call it that,

00121:01 HOFFMAN

02 between SSA, so.

03 Q. Is that something that you learned
04 from Mr. Downing?

05 A. I learned it not just from him, but
06 from the whole understanding of what this work
07 is about.

70. PAGE 121:22 TO 122:25 (RUNNING 00:01:18.000)

22 Q. I have heard you talk about defining
23 yourself as a man, connecting more with men.
24 It seems like kind of bigger things.

25 I'm wondering if any of the tools

00122:01 HOFFMAN

02 that you have to deal with flare-ups of SSA are
03 more immediate in nature?

04 A. More immediate? I would say calling
05 a friend, you know, having a phone call with a
06 friend that I can talk about -- talk to and
07 open up with, like going out for coffee with a
08 friend. Those are things I can do with men
09 that are immediate and quick.

10 But then with myself, I sometimes
11 like to write a list of different attributes
12 that I see in myself that are positive, and
13 just write and write and write and write and
14 make sure that I have a very real and truthful
15 list about who I am.

16 The writing really engrains who I am
17 into -- to myself, and then sometimes I will
18 read it in front of a mirror, even.

19 I think even making sure that I'm
20 attending like yeshiva, which is the Jewish
21 school, on a regular basis, which is an
22 immediate thing that I do, because I get a lot
23 of support from friends there. From God, I get
24 a lot of support from my relationship with him,
25 too. Those are immediate things.

DEPOSITION VIDEOS

71. PAGE 125:10 TO 125:20 (RUNNING 00:00:23.886)

10 Q. So going back to the toolbox for a
11 moment. Those are things that you may do until
12 your attractions to men, or your flare-up
13 passes, and becomes manageable again?
14 A. I would do them the rest of my life.
15 I don't think I need to stop. I think they are
16 normal, healthy things that I should be doing
17 the rest of my life.
18 So it's never like I reach them and
19 like it stops. That would be kind of foolish.
20 Yeah.

72. PAGE 138:19 TO 140:05 (RUNNING 00:01:33.467)

19 Q. What have you done over the course
20 of your treatment with JONAH, Alan Downing to
21 work on your OSA?
22 A. I mean, the work that -- that I have
23 described so far really does play a part in
24 enhancing the OSA attractions, because the way
25 I see it, the more I'm able to see myself as a
00139:01 HOFFMAN
02 man and feel part of the world as men, the more
03 I start to be more interested and start to even
04 kind of crave and want experience with that
05 which isn't me, which is the feminine.
06 So the more I solidify my
07 masculinity, the more I start to notice the
08 femininity. That's exactly how it worked.
09 That's how I saw it. I saw it play a huge part
10 in my attractions to women. So that's the
11 answer.
12 Q. That included individual coaching
13 with Alan Downing?
14 A. I would say coaching was an aspect
15 of it, yeah.
16 Q. An aspect of becoming more
17 integrated in the world of men?
18 A. Uh-huh. Yes.
19 Q. And attending Journey Into Manhood
20 weekends was also an aspect of it?
21 A. Yes.
22 Q. How about Journey Beyond?
23 A. Yes.
24 Q. What other components of JONAH's
25 program did you avail yourself of in working on
00140:01 HOFFMAN
02 your OSA attractions?
03 A. In everything that I have described
04 really plays a part in that for the reason I
05 stated.

73. PAGE 147:24 TO 147:25 (RUNNING 00:00:06.013)

24 Q. Isn't OSA opposite sex attraction?
25 A. Correct.

74. PAGE 148:08 TO 148:21 (RUNNING 00:00:39.187)

08 Q. So increasing your OSA could be
09 increasing your emotional attractions to women
10 only?
11 A. Not only. I think there's an aspect
12 that does increase their being some sort of
13 sexual -- sexual desire.
14 Q. But it doesn't have to?

DEPOSITION VIDEOS

15 A. I think attraction is a very big
16 word, with many different components in it.
17 Sexuality, emotional, spiritual attraction to
18 the other person you are with. It could be all
19 sorts of things.
20 So it doesn't always have to be, but
21 it can be.

75. PAGE 148:22 TO 148:23 (RUNNING 00:00:06.933)

22 Q. So on 103, 104, 105, if you just
23 glance at it.

76. PAGE 149:05 TO 149:08 (RUNNING 00:00:12.167)

05 Q. Does this look like one of the
06 nudity exercises with Mr. Downing on July 7,
07 2008?
08 A. Yeah, it does.

77. PAGE 150:07 TO 150:12 (RUNNING 00:00:14.367)

07 Q. The first part of the session was
08 you sitting clothed, talking through what you
09 perceived as positive or neutral?
10 A. Actually, it could have also been me
11 standing in front of a mirror, but clothed,
12 talking about it.

78. PAGE 150:23 TO 151:08 (RUNNING 00:00:24.200)

23 Q. Was that the first thing that
24 happened in the session, is that you were
25 standing in front of the mirror taking this
00151:01 HOFFMAN
02 inventory?
03 A. The first thing that happened in the
04 session, you are asking? No, I think I brought
05 it up as that this is something that I have
06 struggles with, and we talked a little bit
07 about the struggle, and then he asked if I
08 wanted to do a process around it.

79. PAGE 151:09 TO 151:16 (RUNNING 00:00:15.733)

09 Q. What prompted that topic for this
10 particular session? The topic of your body
11 issues?
12 A. Body image? It was something I was
13 very aware of, so I brought it up.
14 Q. Were you aware of this particular
15 exercise?
16 A. No, I don't think so.

80. PAGE 151:17 TO 152:05 (RUNNING 00:00:32.833)

17 Q. You hadn't talked to anyone who had
18 engaged in it before that time?
19 A. No. I was aware of nudity, however,
20 being on weekends and on retreats, like I think
21 I might have been on the New Warriors weekend
22 by this time already.
23 I think -- yes, I was, actually,
24 because the New Warriors weekend was in the
25 spring of 2008, and this is the summer of 2008.
00152:01 HOFFMAN
02 So I was already exposed to the benefits, the
03 healing benefits of being able to experience
04 myself nude with other men, so it wasn't a
05 surprise.

DEPOSITION VIDEOS

81. PAGE 152:12 TO 152:16 (RUNNING 00:00:15.000)

12 Q. On how many occasions did you
13 experience nudity with Journey Into Manhood?
14 A. Maybe twice. It wasn't a common
15 thing. And it depended, really, on the
16 participant being helped at the time.

82. PAGE 153:04 TO 156:17 (RUNNING 00:03:52.733)

04 Q. So after you had done the inventory
05 on 104, what happened next?

06 A. So standing in front of the mirror,
07 and as you see on the next page, I have
08 different negative perceptions of my body and
09 myself, starting with skinny and weak, et
10 cetera, going down.

11 And each time I became aware of
12 these negative messages, I was -- it was
13 suggested to me to remove an article of
14 clothing or allow myself to become more
15 vulnerable with myself in relation to the
16 message.

17 Q. How did Mr. Downing suggest that you
18 remove articles of clothing?

19 A. That's a good question. He would
20 say something to the effect of, allow your
21 clothing to represent your negative messages,
22 and how would you like to remove, you know, the
23 negative messages, can you think of a way that
24 would be beneficial for you to release those
25 negative messages, being that the clothing,

00154:01 HOFFMAN
02 which were on my body and represent sort of a
03 symbolic representation of -- of my body, and
04 how I like to see myself.

05 So once I attributed all the
06 negative perception to them, he encouraged me
07 to find ways to remove the negative messages
08 associated with the clothing.

09 Q. What did he say, to the best of your
10 recollection?

11 A. Is there any way that you would like
12 to become more vulnerable with yourself.

13 Q. And what did you say?

14 A. I said yes.

15 Q. And what did he say?

16 A. How would you like to do that.

17 Q. And what did you say?

18 A. I said I would like to remove my
19 shirt first. I would like to remove the shirt
20 and see how I feel becoming vulnerable with
21 myself in that way.

22 Q. Why did you choose that?

23 A. It just made a lot of sense to me,
24 that I had already experience doing nudity
25 exercises. I wanted to become more vulnerable

00155:01 HOFFMAN
02 with myself during this session. Vulnerability
03 is best implemented for me when I allow myself
04 to see my full body without any walls or
05 clothes to protect that.

06 And so I just logically deduced that
07 this would be something that would be
08 beneficial for me to do, and I definitely see
09 the value in trying that.

10 Q. You took off your shirt first?

DEPOSITION VIDEOS

11 A. Yeah, I think so. I can't recall.
12 Yeah.
13 Q. When you took it off, you associated
14 your shirt with a specific --
15 A. Negative attribute.
16 Q. Negative attribute.
17 A. Uh-huh.
18 Q. Do you remember which negative
19 attribute?
20 A. Maybe skinny and weak. I can't
21 recall the session that detailed.
22 Q. How did it come to be that you
23 associated specific attributes with a --
24 attributed certain body image issues with a
25 specific piece of clothing?
00156:01 HOFFMAN
02 A. There was a list of body image
03 issues or perceptions of myself, and basically
04 whatever I felt I was ready to do first went
05 with the first thing on the list. There was no
06 necessary order to it.
07 Q. How long did the process take of
08 becoming undressed, approximately?
09 A. Becoming undressed? From start to
10 finish, with the undress part, like 10 to 15
11 minutes.
12 Q. You didn't resist the process at
13 all?
14 A. I didn't feel the need to.
15 Q. Even to take off your underwear, you
16 didn't express any resistance to Mr. Downing?
17 A. No.

83. PAGE 156:18 TO 161:13 (RUNNING 00:05:35.100)

18 Q. Once you were undressed, how long
19 were you undressed?
20 A. For maybe 10 minutes.
21 Q. And what happened during that time?
22 A. I allowed myself to be very
23 vulnerable with myself by looking at myself
24 from top to bottom. I honored it. I touched
25 my body in different -- like felt my muscles
00157:01 HOFFMAN
02 and my power through that, while closing my
03 eyes and then even while opening them, just to
04 feel the difference in what it's like to close
05 your eyes and to feel your power versus to see
06 it on your physical body.
07 I allowed myself to really just
08 honor the body that I exist in. That was
09 probably one of the most empowering parts of
10 the whole session.
11 Q. What was Mr. Downing doing during
12 that 10 minutes?
13 A. He was sitting on his chair about
14 eight feet away, I would say.
15 Q. What did he say during the 10
16 minutes?
17 A. He was encouraging me to honor what
18 I see, to love what I see, to -- to feel my
19 masculinity, and to do what's most comfortable
20 for you to do so.
21 Q. Did he set any boundaries as to what
22 that might be?
23 A. Set any boundaries? I think it was
24 clear -- he didn't set any verbal boundaries.

DEPOSITION VIDEOS

25 It was clear that this wasn't a sexual process,
00158:01 HOFFMAN
02 so -- but it definitely wasn't.
03 Q. How did you know when to start
04 putting your clothes back on?
05 A. After I felt very sufficiently
06 affirmed and in touch with my vulnerability and
07 my body in this very kind of affirming and
08 powerful way. Alan said, when you feel like
09 you have that, when you have gotten there,
10 allow yourself to repeat on your clothing and
11 associate a new message to each article of
12 clothing.
13 So a positive message, and that's
14 what you see at the bottom. I would feel more
15 in touch with myself and my masculinity, and
16 then I was definitely ready to put back on my
17 shorts, which is I have power and et cetera,
18 and really soak that in with my clothes on.
19 Q. You mentioned before that during the
20 10 minutes, there were certain affirmations
21 that you gave yourself by touching parts of
22 your body.
23 A. Yeah. So -- and you see that on the
24 side, too. I felt my power in my pecs and my
25 penis. I felt my attractiveness in my chest
00159:01 HOFFMAN
02 and my torso. I allowed my body to kind of
03 symbolically represent all these more deeper,
04 more meaningful perceptions of myself and
05 attributes, because I do think the body does
06 and can represent these more meaningful and
07 really awesome traits of who I am.
08 Q. Was it the same -- the same
09 affirmations here that you were giving parts of
10 your body you did while you were naked as you
11 did put on your clothes, was the same list of
12 affirmations two different times?
13 A. Yes, I believe that's how it went,
14 yes.
15 Q. Which parts of your body did you
16 touch?
17 A. It's listed here. I believe certain
18 parts where I felt like I had power. I
19 resonated most with the pecs and the penis.
20 I'm attractive I felt most in my chest. It's
21 all here.
22 Q. You touched your penis?
23 A. Yeah. I certainly did.
24 Q. Did you touch your rear end?
25 A. I don't think so. It doesn't say so
00160:01 HOFFMAN
02 here, does it? Nope.
03 Q. You believe or you remember?
04 A. I remember, yeah.
05 Q. How long did the process take of
06 becoming clothed again?
07 A. Another 10 minutes, perhaps, of
08 soaking in each article of clothing and its new
09 message.
10 Q. Would you repeat the message more
11 than one time?
12 A. Uh-huh. Yep.
13 Q. Approximately how many times?
14 A. One to two. I don't recall. Yeah.
15 Just enough to really feel it and believe it.

DEPOSITION VIDEOS

16 Q. You had mentioned that this
17 process -- well, how would you characterize
18 your -- what did you get out of this process?
19 A. An extremely sense, strong sense of
20 affirmation of my body, of myself empowered. I
21 felt a strong sense of my masculinity. I felt
22 really quite amazing afterwards, very charged,
23 like powerful. It was great.
24 Q. Did anything happen after you
25 finished putting your clothes on?
00161:01 HOFFMAN
02 A. Like what?
03 Q. Was that the end of the session?
04 A. That was pretty much the end of the
05 session, yeah.
06 Q. This process was one of the
07 highlights of your program with Mr. Downing?
08 A. Highlights? I mean, it was
09 definitely one of the more empowering sessions.
10 I don't know if I could say it was the
11 highlight. I think the whole time being with
12 Alan Downing was the highlight of my life,
13 really, with doing this work.

84. PAGE 161:14 TO 162:08 (RUNNING 00:00:41.400)

14 Q. Is this a process you use with your
15 clients?
16 A. No.
17 Q. Never?
18 A. Never.
19 Q. Why not?
20 A. There's too much risk involved, and
21 also, you know, apparently, today, we see how
22 it can be misaligned. I don't want to take
23 that risk, but more than that, I do believe
24 that that a lot of the power that this process
25 gave me, I can pass down to my clients without
00162:01 HOFFMAN
02 undressed, and I do think that if a client was
03 really ready for that, I would -- I would sort
04 of type out a process that he could do with
05 himself at home. That's my belief on it today.
06 Q. Have you -- have you done that with
07 a client?
08 A. No, I haven't.

85. PAGE 170:20 TO 171:24 (RUNNING 00:01:16.667)

20 Q. We're still on the same exhibit,
21 Exhibit Number 3, number 3114, several pages
22 forward. Under agenda, in the middle of the
23 page --
24 A. 3114?
25 Q. Uh-huh. It says, "I want to know
00171:01 HOFFMAN
02 how to release the feelings towards my mother."
03 A. Uh-huh.
04 Q. Did Mr. Downing help you do that?
05 A. Yes, he helped me -- yeah, he did.
06 Q. What feelings were those?
07 A. I think I was -- if I recall
08 correctly, I was having some negative feelings
09 that were preventing me from having a full and
10 fulfilling relationship with her. I can't
11 recall the exact details.
12 Q. What emotion was that?
13 A. Probably anger, frustration with my

DEPOSITION VIDEOS

14 mom, and sort of her somewhat overbearing type
15 of ways.
16 Q. How did you release that anger?
17 A. I don't recall. I don't recall what
18 happened, either talking through it or maybe --
19 yeah, I don't really recall, to be honest.
20 Q. Did you engage in beating a pillow
21 or a punching bag or something like that?
22 A. I don't think I ever did. So --
23 around my mom, but definitely in other
24 processes.

86. PAGE 172:04 TO 172:16 (RUNNING 00:00:27.434)

04 Q. What process do you recall relating
05 to your mom that you engaged in?
06 A. I think it was more speaking through
07 things and getting to the core of what was
08 really bothering me, learning how to draw
09 boundaries that are healthy that enhance
10 relationship and don't make it worse, so.
11 Q. Was that psychodrama?
12 A. No. Just talk, discussion.
13 Q. With Mr. Downing?
14 A. Uh-huh.
15 MR. LiMANDRI: That's a yes?
16 A. Yes. Excuse me. I'm sorry.

87. PAGE 173:13 TO 174:10 (RUNNING 00:01:17.167)

13 Can you recall some of the main
14 affirmations that you have used --
15 A. Sure.
16 Q. -- through your life coaching?
17 A. I'm powerful. I'm likeable. I am
18 strong. I am honest. I have integrity. I'm
19 loved. I'm loveable. I'm wise. I'm
20 intelligent. I'm attractive. I am capable,
21 among many others.
22 Q. How do such affirmations fit into
23 your efforts to become more heterosexual?
24 A. They are truths about me that I used
25 to not see in myself, but I did easily see them
00174:01 HOFFMAN
02 on other men, and when I did that, I usually
03 craved those other men, because I wasn't
04 allowing myself to see those positive traits in
05 myself.
06 So when I could finally own my own
07 masculinity in that way, and all these
08 wonderful traits that are true about me, it
09 pretty much put an end to that -- to that
10 craving of other men that I just described.

88. PAGE 174:11 TO 174:18 (RUNNING 00:00:26.600)

11 Q. Was going to the gym a part of your
12 sexual orientation change efforts?
13 A. Going to the gym was important for
14 me because it just enabled me to feel healthy
15 and capable at taking care of myself, and it's
16 really that which is the important aspect of
17 the work, not necessarily the specific going to
18 a gym.

89. PAGE 178:04 TO 179:24 (RUNNING 00:02:06.966)

04 Q. In his notes, it says, "Change is
05 just the surface. Choice is the process.

DEPOSITION VIDEOS

06 Transformation is the end result."
07 A. Correct.
08 Q. What does that mean, the change is
09 just the surface?
10 A. That -- this is actually a really
11 important truth about this work, that when we
12 say that men can change or people can change,
13 that it's something that's more overt, that we
14 see it right away, often, depending on what the
15 man is going through and how he is working on
16 himself, but that's not the end result.
17 Change is clear, and we see it and
18 we feel it, but -- and it's very encouraging,
19 and it comes through, making a choice to
20 continue pursuing the change, which is the
21 process. I continue to choose that. This is
22 what I want, and I want to keep feeling this.
23 Transformation is the end result, is
24 that you have that full and complete,
25 100 percent transformation, is something that
00179:01 HOFFMAN
02 comes much later, and perhaps takes a lifetime
03 to achieve, and that it's not something that I
04 should expect to happen right away, because
05 it's not the thing that happens. That's sort
06 of what I have been saying before, that it's
07 not an on and off switch. It's more of a
08 process that involves there being change and
09 change of behavior and change of belief about
10 self, that, over time, definitely can show
11 benefit and reduce attractions and enhance
12 opposite sex attraction, but for there to be a
13 complete and total transformation from gay to
14 straight or just where you no longer ever feel
15 homosexual attractions, that can take a
16 lifetime of transformation. That's more of a
17 permanent, but also, again, a longer thing to
18 achieve.
19 Q. Is that complete transformation
20 within your reach?
21 A. I hope so, but it's not something I
22 expect for myself, because I'm happy with the
23 change I have already achieved, and I feel like
24 I have been extremely successful, nonetheless.

90. PAGE 185:24 TO 187:09 (RUNNING 00:01:30.100)

24 Q. 150, at the top, under the headline
25 mission, taking what I have learned and pass it
00186:01 HOFFMAN
02 forward to others.
03 Is that a life mission or something
04 else than that?
05 A. It's an aspect of my life mission.
06 Q. When you say aspect, do you have a
07 greater life mission than that?
08 A. I do.
09 Q. What's that?
10 A. I used to have like a statement that
11 I would say to myself, and I actually forgot
12 it, but I do know that, overall, my mission is
13 to provide beneficial and wonderful help to
14 others through just being a light of who I am
15 to the world, of being a representation of
16 myself, and allowing that to inspire and
17 influence others, particularly those who want
18 to seek inspiration from me.

DEPOSITION VIDEOS

19 And part of my mission is definitely
20 to be a child of God, and allowing his light to
21 shine through me, being a really good father
22 and husband. There's a lot in my mission, and
23 this is just an aspect of it, yeah.

24 Q. When you say helping others, you're
25 specifically referring to others who experience
00187:01 HOFFMAN

02 unwanted same sex attraction?
03 A. Not necessarily. I really think
04 this work isn't always about SSA, same sex
05 attraction. And there's a lot of work that we
06 do that I've seen personally, and I believe
07 very wholeheartedly that it can help all men,
08 and I want to pass that down to men who need it
09 and want it.

91. PAGE 188:05 TO 188:25 (RUNNING 00:00:56.500)

05 Q. And a way to -- one of the ways
06 you're reaching to fulfill your life mission,
07 is to be an example?

08 A. To be an example of -- yeah, sure.

09 Q. That includes putting your best --
10 sort of your best face forward to those who are
11 struggling?

12 A. It includes -- if my best face is me
13 at my core, then, yes, yes.

14 Q. Does it include being a success
15 story in having gone through sexual orientation
16 change efforts?

17 A. It doesn't have to be. I don't like
18 to define myself at my core as someone who
19 simply overcome unwanted same sex attraction,
20 but more as a man who simply having -- been
21 able to discover who he is at his core and
22 connect to others as a result in a very healthy
23 way. That enabled me to also overcome same sex
24 attractions, but I don't think I'm just that as
25 a man.

92. PAGE 196:19 TO 197:24 (RUNNING 00:00:59.000)

19 Have you ever engaged in holding
20 with Mr. Downing?

21 A. Yes.

22 Q. On this occasion, do you recall?

23 A. This occasion, I think he held my
24 hand, and it's possible that he then gave me a
25 big hug.

00197:01 HOFFMAN

02 Q. What's the longest period that you
03 recall holding with Mr. Downing?

04 A. Maybe two or three minutes.

05 Q. Was that in a private session or
06 Journey Into Manhood?

07 A. It was in a private session, and
08 possibly -- and also in Journey Into Manhood,
09 yeah.

10 Q. In the private session, we have
11 heard of different formations of healthy touch.

12 What formation was it for several
13 minutes?

14 A. He was more holding me like a son, a
15 father to a son.

16 Q. Was he sitting down on the floor?

17 A. He was on a chair, on a couch that
18 he has in his office.

DEPOSITION VIDEOS

19 Q. So you were sort of --
20 A. Being embraced by him.
21 Q. Being embraced by him. Sort of like
22 a baby or something, cradled?
23 A. A baby? Yeah, it was very
24 comforting.

93. PAGE 201:20 TO 201:23 (RUNNING 00:00:06.700)

20 Q. How many times have you been to
21 Journey Beyond?
22 A. I went to it once as a participant,
23 and I staffed it three times.

94. PAGE 203:10 TO 203:19 (RUNNING 00:00:21.133)

10 Q. Journey Beyond focuses particularly
11 on increase in opposite sex attraction?
12 A. It focuses on life, not just that.
13 Yeah, it focuses on everything.
14 Q. Journey Beyond is a significant part
15 or was a significant part of your sexual
16 orientation change efforts?
17 A. It was -- yeah, it was a significant
18 part to my journey toward becoming a more whole
19 man.

95. PAGE 218:18 TO 220:19 (RUNNING 00:02:30.333)

18 Were you married on November 14?
19 A. November 21 -- 27th. That was when
20 we hoped to have gotten married, but it didn't
21 work out.
22 Q. Why not?
23 A. Just logistical planning didn't fall
24 in sync, and again I correct myself. It was
25 November 29 that we got married, not the 27th.
00219:01 HOFFMAN
02 Q. Mr. Downing helped you create a plan
03 from July 14, 2010 until you were married?
04 A. I suppose, yeah, a plan to just take
05 care of myself, as you see, to -- yeah, yes.
06 Q. Which included taking care of your
07 needs?
08 A. Uh-huh. Continuing this work
09 further.
10 Q. More male interaction?
11 A. Yeah.
12 Q. Sports was part of your --
13 Support. That says -- oh, sports,
14 physical -- yeah, I think that it was -- I used
15 to like to play Frisbee a lot, go to the gym.
16 I guess I included that in sports, something
17 physical, something to do that would be body
18 oriented.
19 Q. Why did you need a support team and
20 a plan at this point?
21 A. I didn't need a support team. Oh, I
22 see. I understand what you mean.
23 There's a lot that goes on when you
24 get engaged. There's a lot of stress. There's
25 a lot of planning. And I felt that it was
00220:01 HOFFMAN
02 imperative for me to have people to turn to and
03 rely on.
04 Q. Why?
05 A. Why? Because it's an aspect of my
06 just taking care of myself, yeah. I think

DEPOSITION VIDEOS

07 everyone who gets engaged would understand
08 that, and want there to be some sort of, you
09 know, people that you can turn to throughout
10 the stress of all the wedding planing and all
11 the invitations and this and that. Just so
12 much logistics. A lot of stress.
13 So it's just me being conscientious
14 of that and taking care of myself.
15 Q. You were afraid that you might slip
16 up in the meanwhile?
17 A. No, that wasn't a fear back then. I
18 was more excited to get married than anything,
19 so.

96. PAGE 242:18 TO 243:23 (RUNNING 00:01:33.267)

18 Q. How did you find JONAH? It was
19 through an internet search?
20 A. Not quite.
21 Q. How did you find it?
22 A. This was after -- in 2006, after the
23 high holidays, I was at my wits' end,
24 struggling with pornography and behaviors that
25 were homosexual, not in line with my values,
00243:01 HOFFMAN
02 and I was just really at my wits' end. So I
03 did a search for the only Jewish organization
04 that I knew that addressed homosexuality, and
05 at that time it was Trembling Before God, which
06 is a documentary that I'm sure you're familiar
07 with.
08 I quickly went to the web site, and
09 the first thing, for whatever reason, I decided
10 to do, is look at the critique section on the
11 documentary, and the first critique I read
12 spoke about how the documentary neglected to
13 mention JONAH. When I saw that, and that JONAH
14 was an organization that helps men with
15 unwanted same sex attractions, I immediately
16 Xed out Trembling Before God and I went to
17 JONAH instead, and the rest is history.
18 Q. What is it that you had been doing
19 that had troubled you so much?
20 A. Acting out with men to start, and
21 pornography, masturbation.
22 Q. How old were you at the time, 19?
23 A. This was 19.

97. PAGE 272:03 TO 291:20 (RUNNING 00:20:29.133)

03 Q. Mr. Hoffmann, what aspects of
04 Journey Beyond were most beneficial in your
05 process of sexual orientation change efforts?
06 A. The entire weekend is structured
07 around going literally from birth to
08 discovering the feminine, and in between all of
09 that, there's a huge process of first living
10 out processes that kind of relate to boyhood,
11 because that's what -- you are born, you
12 experience boyhood, and allowing yourself to
13 feel kind of like a boy, who is still not fully
14 matured and developed, and -- but, nonetheless,
15 has a lot of things that a boy can and should
16 experience going through life, such as being
17 wild at times, having fun, being crazy, playing
18 games and bonding with other boys.
19 And then the weekend kind of matures
20 you past that through a state of like

DEPOSITION VIDEOS

21 adolescence into manhood, where you then
22 experience a lot more mature warrior type
23 processes, where you experience yourself more
24 as a man, more in touch with your body and it
25 physical power, its physical maturity and
00273:01 HOFFMAN - CONFIDENTIAL
02 whatnot.
03 And then after soaking in all of
04 that masculinity of boyhood to then manhood,
05 being introduced to the feminine and feeling
06 the difference of what's that like to then
07 experience women from a place of being
08 supercharged as a man, which is what the
09 weekend successfully, in my judgment, does.
10 And then we are introduced to women
11 and feeling that attraction towards them from
12 that place of maturity manhood. The weekend
13 then presents itself that way, and we
14 experience processes around women and the
15 feminine.
16 And overall, it's an incredible
17 experience because you go from the beginning of
18 life until where you are today and experience
19 life all over again to a degree, and the
20 processes very much touch on what has been
21 already discussed, but on a very more kind of
22 complex and deep -- deeper level.
23 Q. Beginning with the birth, is there a
24 rebirthing?
25 A. There is a process that's like a
00274:01 HOFFMAN - CONFIDENTIAL
02 rebirthing, where you are kind of born and you
03 experience being kind of held and sort of like
04 a nursery and feeling kind of that warmth,
05 nurturing environment.
06 Q. Is the subject naked when he is
07 reborn?
08 A. Yes.
09 Q. Is there baby powder as part of
10 that?
11 A. Yes.
12 Q. Each participant is born in
13 succession?
14 A. All together in one room. It would
15 take forever if it was one by one.
16 Q. So how was one reborn?
17 A. They are placed on a mattress,
18 blindfolded, just so they don't know where they
19 are going and what's about to happen, and
20 before they are placed, they are told to
21 undress, and then they are led to this
22 mattress, their own specific one. It's not a
23 full mattress. There's many different
24 individual mattresses, and they are covered up
25 very tightly in a blanket to simulate the womb.
00275:01 HOFFMAN - CONFIDENTIAL
02 And then there's music and there's a
03 dialogue where men are kind of asked to go
04 back, if they can, you know, to an era when
05 they were born. It's more of a visual
06 imagination thing.
07 And then there's music that talks
08 about, and dialogue that explains there being a
09 birth, and what it feels like to now be a baby
10 and nurtured, and you feel like music
11 accommodating that, and then men come and kind

DEPOSITION VIDEOS

12 of nurture these new like babies in a very
13 affirming and loving sort of way, you know,
14 kind of wipe water on their face, and kind of
15 clean them up, and it feels very real. I did
16 it, and it can sound maybe odd from the
17 outside, but when you're in it, it's as real as
18 I think a process can be in order to kind of
19 take you back to that place of feeling the
20 nurturing energy and love.

21 Q. Are the -- the individuals being
22 reborn, are they the only ones naked or also
23 the nurturers?

24 A. No, they're the only ones naked.

25 Q. They are blindfolded until they are
00276:01 HOFFMAN - CONFIDENTIAL
02 reborn or when does the blindfold come off?
03 A. They are asked to remove the
04 blindfolds after the rebirth -- after the
05 birth, yes.

06 Q. And the birth is auditory or there's
07 something specific -- you said they are wrapped
08 in blankets so they are breaking free or what's
09 happening?

10 A. They are told to kind of come out
11 and kind of feel themselves be free from that
12 blanket, that womb.

13 Q. Is there any additional like birth
14 canal, apart from the blanket, that they are
15 bound in?

16 A. No.

17 Q. How long does the process of rebirth
18 take?

19 A. It's about a 45-minute process.

20 Q. And you have experienced this as a
21 participant and also several times as someone
22 that would be nurturing?

23 A. Yes.

24 Q. Okay. And then what happens after
25 the rebirth?

00277:01 HOFFMAN - CONFIDENTIAL
02 A. What happens after the rebirth is
03 there's a call to kind of leave the mother
04 womb, and experience what it's like to kind of
05 go out and be crazy in the outside world and be
06 like a boy.

07 Q. Is there any specific sort of
08 breaking of the umbilical cord or --

09 A. No.

10 Q. At what point do the participants
11 put their clothes back on?

12 A. Much later.

13 Q. At what point?

14 A. They put their -- they are given,
15 actually, new clothes eventually, after the
16 proceeding process, and then another process.
17 It's a complex -- it's a complex thing. It's
18 long, yeah.

19 Q. The weekend, in its entirety, lasts
20 three days, two days?

21 A. I think it's almost three and a half
22 days, almost four.

23 Q. What's involved in the wild phase?
24 Is that the next phase after birth?

25 A. Uh-huh, yeah. There's like an
00278:01 HOFFMAN - CONFIDENTIAL
02 archetypical, I'm not sure if I say that right,

DEPOSITION VIDEOS

03 I'm sorry, like an archetype father, a man
04 representing like a kind of crazy, fun father
05 who like bursts into the nursery and says come
06 on, boys, let's have some fun together, and
07 then they are called out to -- they are called
08 out to this field where there's just so much
09 fun, boyish things to do with each other.
10 There's music and dancing, and there's a fire.
11 There's like fireworks. There's throwing
12 like -- there's like a water slide. And it's
13 literally such a fun, boy atmosphere, where men
14 are just having a lot of fun together
15 experiencing their wild side.

16 Q. And, at this time, it's all men.
17 There's no women involved?

18 A. There's no women involved until the
19 very last day of the weekend.

20 Q. Have any of the plaintiffs in the
21 lawsuit, Mr. Goldberg, Mr. Downing, have
22 they --

23 MR. LIMANDRI: Defendants.

24 Q. I'm sorry, the defendants in the
25 lawsuit, have they played specific roles during
00279:01 HOFFMAN - CONFIDENTIAL

02 this process? You mentioned the wild father.

03 A. Yes. Yeah, Alan Downing was the
04 wild father on one of the weekends, I think he
05 staffed through myself.

06 Q. And during all of this course, the
07 participants are still naked, but not the other
08 individuals?

09 A. By the time the wild party comes
10 along, everyone kind of joins the celebration
11 unclothed.

12 Q. And how long does that party last?

13 A. A good hour.

14 Q. And you said there is dancing?

15 A. Uh-huh, yeah.

16 Q. Dancing in couples, together, alone?

17 A. It's just fun, brotherly dancing.

18 Not couples. I don't think I've seen like
19 couples dance. But men holding hands in a
20 circle and going all around the campfire and
21 just expressing their little like boyish energy
22 which we can still accept and honor today in a
23 healthy way, which is what the weekend allows
24 for.

25 Q. It's completely carefree?
00280:01 HOFFMAN - CONFIDENTIAL

02 A. Yes.

03 Q. Completely without shame?

04 A. Without shame? Yeah, that's the
05 best part, is that here you are finally able to
06 experience an environment where there's no
07 shame, and you can just be your fun self, and
08 you're already so vulnerable with each other,
09 but that almost becomes like a secondary thing.
10 It's now like we're just all fun and having a
11 fun time together, and none of this starts to
12 matter.

13 And the walls are really broken
14 down. It's an incredibly awesome experience.

15 Q. It's a sense of unity with the
16 participants?

17 A. Sense of unity, but boyish
18 brotherhood is how I would describe it.

DEPOSITION VIDEOS

19 Q. Are there any boundaries at all,
20 guidelines?
21 A. There are definite guidelines, not
22 too -- from the very outset that there should
23 be no sexual behavior whatsoever, and very
24 strict in place, and if there ever is such a
25 charge, that it's -- that they are kindly asked
00281:01 HOFFMAN - CONFIDENTIAL
02 to report it to someone and process it, so that
03 they can move through the weekend safely and
04 effectively.
05 Q. If there is an erection, it's not a
06 big deal, but it's processed?
07 A. Yes, yes. If that person chooses to
08 process it. A man might just allow it to be
09 something that happened, and, okay, and not
10 make a big deal out of it, and doesn't need to
11 process.
12 Q. Did that happen to some people?
13 A. I've never seen it happen to a
14 person, no.
15 Q. What happens after the wild party?
16 A. After the wild party, they're led to
17 the showers to clean up after all the cake that
18 was flung around and mud, and just all the
19 carefreeness, and then they are led to an
20 exercise where we are able to confront a lot of
21 their boyish wounds that they've experienced
22 growing up.
23 That kind of reenacts an environment
24 where they can hear certain wounds and feel
25 certain wounds for the process, of course, of
00282:01 HOFFMAN - CONFIDENTIAL
02 moving beyond them.
03 Q. Is that an individual guts work
04 process, or it's collective, where everyone is
05 experiencing the same instruction?
06 A. It's collective.
07 Q. Going back to the group shower just
08 for a second. Are the individuals helping wash
09 the participants or what's the dynamic, like
10 what happens?
11 A. It's just a carefree, you know, if
12 there's cake on my back, can you help me get it
13 off my back, and again, all the -- a lot of
14 that sort of energy that -- around nudity
15 becomes very secondary. It's actually pretty
16 phenomenal how we kind of -- we just become
17 like a locker room now, where men are kind of
18 just carefree with each other and having a
19 great time.
20 And I think that, in and of itself,
21 is actually really an affirming thing for a lot
22 of men who are struggling with same sex
23 attractions that are unwanted.
24 Q. I lost my train of thought.
25 So after the showers, you we were
00283:01 HOFFMAN - CONFIDENTIAL
02 just talking about -- oh. What's said in the
03 showers or is there an instruction given at
04 all?
05 A. No. It's very carefree.
06 Q. In the next section where there's
07 the collective process, what wounds are
08 solicited or what's being said? What's
09 happening?

DEPOSITION VIDEOS

10 A. It's an environment like
11 archetypical, again, that word, I'm sorry, but
12 an archetype bully kind of comes into play, and
13 starts slinging out different phrases that were
14 commonly heard by a lot of us men on the
15 playground, in a locker room, and then there's
16 also individual -- that men are called up to
17 certain stations, where they are kind of given
18 a wound metaphorically, like -- through like
19 paint, like a red piece of paint is put onto
20 their body somewhere, kind of representing that
21 they've been wounded.

22 And as that happens, the staff
23 member kind of repeats or kind of says one of
24 the wounds that were written down prior to them
25 joining the weekend. So it's done in a private

00284:01 HOFFMAN - CONFIDENTIAL
02 environment, where they can't -- those wounds
03 can't be heard, but like they hear these
04 negative messages, again, that these men carry
05 still today, and then they're metaphorically
06 given like a -- again, that symbol that they
07 have it still on them.

08 Q. How does that differ from the
09 Journey Into Manhood initiation, where it
10 sounds like there's a similar scene in the
11 locker room and --

12 A. It didn't differ that much, besides
13 for the fact that it's a lot more
14 individualistic.

15 Q. How are those wounds processed?

16 A. The men journal about the wounds and
17 kind of hold on to them as the weekend
18 progresses, and notices how they change and
19 they kind of decrease over time. And I even
20 believe that one of the -- there is a
21 psychodrama eventually, where men are able to
22 bring that same exact wound up and choose to
23 process it, if they would like.

24 Q. How did they eventually shed the
25 wound?

00285:01 HOFFMAN - CONFIDENTIAL
02 A. Through the processes in the weekend
03 itself, and the psychodrama, overcoming the
04 negativity, the emotion, all of what I've
05 discussed.

06 Q. And any answer to this question, at
07 least for this present one, but is the
08 psychodrama through the entire course of the
09 weekend collective, or is there a time when it
10 does become more individual?

11 A. The latter. There's a time where it
12 becomes more individual.

13 Q. What time is that?

14 A. I'm trying to remember. I believe
15 it's two days later. A day passes. The next
16 day, where they experience a lot of boyhood,
17 and then the next day, which I believe is
18 Friday or Thursday, but nevertheless, the
19 second day they -- the second full day, they
20 experience the psychodrama.

21 But all the processes that led up to
22 that also address the wound and just wounding
23 in general.

24 Q. So far, we're on the first day, and
25 what happens after this receiving of the wounds

DEPOSITION VIDEOS

00286:01 HOFFMAN - CONFIDENTIAL
02 on the first day?
03 A. I think that's it. They go to
04 sleep. That's the end of the day, yeah. They
05 are asked to sit and journal about it and to,
06 obviously, at any time, seek support from
07 staff, if necessary, around it. They're in a
08 supportive environment as it is, where men can
09 discuss it with each other, so.
10 Q. The process elicits deep emotions
11 for some people?
12 A. I honestly haven't seen that. I
13 think it more kind of brings it to more of a
14 mental cognizance, not necessarily a deep
15 emotional place. Although I can imagine that,
16 for some men, it has. And if so, they've had
17 support to process that on the weekend.
18 Q. And what happens the first part of
19 day two?
20 A. They are woken up by the archetype
21 boy who starts to play fun games with them,
22 kind of like when boys wake up and they want to
23 go crazy already, and there's like fun music,
24 and they play games, and then they have like
25 kids cereal for breakfast, like Trix and all
00287:01 HOFFMAN - CONFIDENTIAL
02 these sugary stuff.
03 And there's like a frog hunt, where
04 they are paired up with a buddy, and they like
05 look for a real frog. And it's just kind of
06 like a cute way to start the day, just to
07 remind everyone that they are still in like a
08 boyish energy right now.
09 Q. What happens throughout that day?
10 Is the whole day boyish?
11 A. Yeah, up until the midafternoon.
12 Q. And what happens in the
13 midafternoon?
14 A. There's sort of like this
15 adolescence, where men are kind of put into a
16 room and asked to really like kind of evaluate
17 their bodies, body imaging, and kind of feel
18 their bodies kind of change and transform, just
19 like puberty, when the body does do exactly
20 that.
21 There's some music. They're trying
22 to facilitate this more kind of buddying up of
23 masculine energy, and it's like a dance, and
24 there's like movement, and people are
25 blindfolded, and then I think the blindfolds
00288:01 HOFFMAN - CONFIDENTIAL
02 are taken off, and everyone is together, and
03 sees each other again undressed, and there's
04 this feeling of camaraderie and unity, but now
05 in a place of more nature manhood as opposed to
06 boyish manhood.
07 Q. So far, throughout all this process,
08 everyone is naked?
09 A. That particular process, yes.
10 Q. Was there -- is there a time in day
11 two when people are naked or not naked?
12 A. Yes.
13 Q. When does that happen?
14 A. During a lot of the processes.
15 Q. I see. So the naked session on day
16 two is what, in particular?

DEPOSITION VIDEOS

17 A. Is the adolescent stage, when they
18 are starting to discover their bodies more.
19 Q. What happens during the blindfolded
20 portion on day two?
21 A. It was only at the beginning of that
22 process that we just discussed of adolescence,
23 where men are more able to, by being
24 blindfolded, kind of get in touch with their
25 masculine budding energy, but then the
00289:01 HOFFMAN - CONFIDENTIAL
02 blindfold is taken off soon after.
03 Q. How do participants discover their
04 bodies in that process?
05 A. Through dialogue and kind of
06 visualization of the idea that there's a
07 masculine energy budding up in them, and to
08 allow themselves to kind of feel the movement
09 of their body in conjunction with the dancing.
10 Q. So the participants are dancing with
11 blindfolds?
12 A. Moving around with blindfolds, yes.
13 Q. Do they touch themselves at all,
14 like affirming their body, something like that?
15 A. They might touch themselves, sure,
16 because they're feeling that masculine energy
17 in their body, yes.
18 Q. Would the touching include touching
19 their penis at some point?
20 A. Not commonly. I really wouldn't
21 know, because I don't really -- can't focus
22 on -- but it's possible. I mean, the penis is
23 a very powerful symbol for a lot of men. This
24 is where my masculinity resides, because it is,
25 you know, a masculine symbol.
00290:01 HOFFMAN - CONFIDENTIAL
02 Q. Are only the participants
03 blindfolded or also the people that are there
04 to help facilitate?
05 A. I believe the staff members can
06 choose to be blindfolded if they want to
07 partake in the process, but the staff members
08 are usually on the side, just letting the
09 process happen.
10 Q. Is there any touch of each other
11 during the process?
12 A. No.
13 Q. What happens after that?
14 A. After that, I'm trying to remember.
15 There is -- geez, there's dinner, and then --
16 that's kind of like the big process of the day,
17 that kind of ends the day a little bit.
18 There's dinner and there's sort of like a
19 process at night, where kind of men are like in
20 groups, because they were split up into teams
21 before all of this, and kind of process
22 different things that happened, and then they
23 kind of can bond by themselves without -- you
24 know, there's no really -- as the night ends,
25 sort of like the end of that, yeah.
00291:01 HOFFMAN - CONFIDENTIAL
02 Q. Is there healthy touch at that
03 moment?
04 A. If men choose to, you know, engage
05 in sort of having that be a component to their
06 connection, then, sure, but it's not something
07 that's enforced or told to be done.

DEPOSITION VIDEOS

08 Q. When was the last time you staffed a
09 Journey Beyond?
10 A. In 2012, the summer of 2012.
11 Q. How often do they occur?
12 A. Once a year.
13 Q. How does one go to one? Like what
14 is the requirement?
15 A. You have to show a level of
16 commitment to the work. There has to be, I
17 think, evidence -- you have to apply, and then
18 there's an application process, and people are
19 selected based off what they -- what they are
20 able to show their commitment being.

98. PAGE 291:21 TO 298:22 (RUNNING 00:07:01.900)

21 Q. So for day two, you wake up as a
22 boy. There's the adolescent time of playing
23 and catching frogs and such. And then you
24 reach adolescence at around lunchtime or after
25 lunchtime?
00292:01 HOFFMAN - CONFIDENTIAL
02 A. It's more near the midafternoon,
03 late afternoon. There is stuff in between then
04 as well.
05 Q. How long does the body adolescence,
06 blindfolded session work last altogether?
07 A. Maybe 45 minutes.
08 Q. And then after that is dinner?
09 A. I believe so. I don't know the
10 protocol like a hundred percent, even though I
11 have staffed it that many times, but like I
12 could be wrong.
13 Q. Talk a little bit more about the
14 part in the evening, where I think you said
15 that people get together as groups or there's
16 bonding or what does that look like?
17 A. Just men chatting with each other,
18 talking about what they have experienced so
19 far, you know, typical friendship bonding.
20 Q. It's unstructured?
21 A. Yeah.
22 Q. Is there anything else that happens
23 on day two?
24 A. Yes.
25 Q. What's that?
00293:01 HOFFMAN - CONFIDENTIAL
02 A. There's a basketball game during
03 lunchtime, where men are split into teams and
04 experience what it's like to be on teams, and
05 playing basketball, which for a lot of men, not
06 all, is a very hard sport to play, and men
07 are -- get to experience kind of breaking
08 through the fears that they have around the
09 sport, and playing it and seeing how good they
10 are, and it's kind of cool.
11 Q. Is there anything else that happens
12 on day two?
13 A. There is a -- after basketball,
14 there's like an impromptu, like skinny dipping
15 into a pool, where everyone jumps in and like
16 kind of takes off their clothes and remain as
17 boys, which that's what boys do. They have fun
18 together. They, again, not really care about
19 all these kind of boundaries that they put on
20 themselves via clothing, but just sort of be
21 fun and carefree and jump into a lake or jump

DEPOSITION VIDEOS

22 into a pool. And it's a really fun
23 environment, really fun atmosphere.
24 Q. Are participants prepared somehow to
25 know that there will be nudity involved before
00294:01 HOFFMAN - CONFIDENTIAL
02 they get there?
03 A. Yes. I think -- well, you mean
04 before they get there? I think there's like
05 this feeling that it's going to happen based
06 off the fact that that's kind of already been
07 somewhat incorporated into some of the people's
08 work, but not everyone is -- knows about it and
09 told about it. It's deliberately not told to
10 participants.
11 Q. Is there any other feature of day
12 two that we haven't talked about?
13 A. Not that I can recall.
14 Q. What happens when you wake up the
15 next day, day three?
16 A. Day three begins as a man processing
17 different wounds without women there being
18 present yet, but wounds around femininity,
19 starting with mother, going into conflicts that
20 men have within themselves around feeling
21 feminine and whatnot, yeah.
22 Q. Does -- are these collective
23 processes or do you have some individual
24 processes dealing with the feminine?
00295:01 A. They are individual, but kind of
HOFFMAN - CONFIDENTIAL
02 part of -- every process is kind of connected
03 to the other in some way, because, again, it's
04 all about life as I described before.
05 Q. Do these -- I heard testimony before
06 about feminine objects. Is that the sort of
07 thing that's happening here?
08 A. Not in Journey Beyond.
09 Q. So describe what --
10 A. No. Go ahead. Sorry.
11 Q. Describe what -- how is it that the
12 process, assessment and getting in touch with
13 their feminine?
14 A. Well, there's a specific process of
15 helping men get in touch with the anima, which
16 is what we were discussing before, which is
17 lingo given for the -- if you imagine yin-yang,
18 right, there's two sides to it, a white and a
19 black. And then in each black and white,
20 there's also little spots, that's it, the
21 opposite color.
22 And the belief is, is that man is --
23 has masculine and feminine energy, but within
24 that, there's also an aspect that is feminine
25 to a degree, and it's that energy, and also
00296:01 HOFFMAN - CONFIDENTIAL
02 with the women, there's an aspect within her
03 that is considered masculine, and it's those
04 energies that are able to, when tapped into,
05 relate to very strongly and kind of conjoin and
06 kind of start a connection to the opposite sex,
07 because it's similar.
08 So this process regarding the anima
09 allows the men to kind of -- to tap into that
10 feminine energy, which is a little -- more
11 flowing, more creative, and kind of very
12 beautiful music that's played, and men can sort

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13 of sway to it or dance to it and get in touch
14 with it.
15 Q. So there's a cognitive aspect, and
16 then there's an experiential aspect with
17 getting in touch with feminine?
18 A. Correct, uh-huh.
19 Q. What's the experiential aspect?
20 A. Men are blindfolded and given a very
21 soft, silky cloth that, to me, just felt very
22 feminine and kind of like silky hair, at least
23 for me, and there's somewhat of a dancing with
24 it, and kind of moving it to the music, and
25 it's like really, interestingly -- it's really
00297:01 HOFFMAN - CONFIDENTIAL
02 interestingly cool.
03 It really helps a man kind of tap
04 into that sort of creative flowy energy, again,
05 not that meaning to say femininity is
06 equivalent to that, but it's just an energy of
07 sorts, and they are able to tap into it and
08 move with it, and it is experiential.
09 Q. Do participants wear the silky
10 cloth?
11 A. Not necessarily, no, I don't think
12 so, no.
13 Q. How would they interact with the
14 cloth?
15 A. Holding it and moving it and kind of
16 dancing with it.
17 Q. How are participants clothed at this
18 point?
19 A. Completely.
20 Q. Are these with new clothes?
21 A. No, they are still with the same old
22 clothes that they've been invited to wear from
23 the beginning of the weekend.
24 Q. And those are clothes that are
25 furnished for the participants?
00298:01 HOFFMAN - CONFIDENTIAL
02 A. Yes.
03 Q. What do they look like?
04 A. They're very simple. They're tan.
05 And men throughout the course of the weekend
06 start writing negative messages about
07 themselves onto them, things that -- what the
08 process has brought out around their negative
09 messages, and they kind of wear them to kind
10 of -- instead of hide them, show them to the
11 world. Eventually, they are burned. It's a
12 very symbolic representation of moving past and
13 finally surrendering these very old wounds and
14 old messages of one's self.
15 Q. Can you describe them further? Is
16 it cotton, it's one piece, two pieces?
17 A. Polyester, two pieces.
18 Q. Polyester as in like polyester
19 pants?
20 A. I guess they're cotton. I don't
21 recall. They're comfortable, but they are also
22 very plain.

99. PAGE 299:08 TO 313:21 (RUNNING 00:14:13.700)

08 Q. Are they like scrubs, that sort of
09 thing?
10 A. Yes, scrubs.
11 Q. People would be writing messages on

DEPOSITION VIDEOS

12 them?
13 A. Individuals will be writing messages
14 on them about themselves, yes.
15 Q. What sort of messages?
16 A. Negative ones.
17 Q. The wounds that people were
18 carrying, are they also somehow on the clothing
19 at this point, the ones they adopted earlier?
20 A. Through being written down, and
21 they're not adopted earlier. They are wounds
22 that they've carried for years.
23 Q. So going back to the first day, the
24 wounds that they receive are ones that they
25 actually, in their real lives have carried, not
00300:01 HOFFMAN - CONFIDENTIAL
02 something that had been assigned?
03 A. Of course. More related to boyhood,
04 the first day and then adolescence the next
05 day, and kind of all related to those different
06 phases of life that they're going through.
07 Q. So the participants, the clothing is
08 brown clothes?
09 A. Uh-huh.
10 Q. And you have the silk cloth.
11 Is it a big silk cloth? What is it
12 like?
13 A. I don't know. It's this big.
14 Q. Is it colorful?
15 A. Yeah, I think so, yeah. But we're
16 blindfolded with it, so more imagine as a
17 woman -- sorry, feminine energy. It doesn't
18 have to be -- it could be anything.
19 MR. LIMANDRI: The record should
20 probably reflect he indicated with his
21 hands, it looked like about three to
22 four feet?
23 THE WITNESS: Yeah.
24 Q. And these are used as blindfolds
25 tied behind, sort of flowy?
00301:01 HOFFMAN - CONFIDENTIAL
02 A. No. The blindfolds are not the
03 cloth. They're just blindfolds with the cloth.
04 Q. You mentioned a wig. Do the
05 participants wear -- I thought you said
06 something about flowy hair, but maybe you meant
07 the cloth itself.
08 A. No, no, no. The cloth itself kind
09 of feels like flowy hair of a woman for me.
10 I'm speaking more for myself in that place,
11 yes.
12 Q. I understand.
13 Are there any other props in
14 addition to the cloth?
15 A. No, not during that process.
16 Q. The way to envision it is that the
17 participants are dancing to lively music?
18 A. Lively, kind of feminine music, with
19 a very soft feminine voice singing, yeah.
20 Q. How long does that work?
21 A. About 25, 30 minutes.
22 Q. Is there anything else that occurs
23 in addition to the individuals dancing?
24 A. Not during that process, I believe.
25 Q. How does that process conclude?
00302:01 HOFFMAN - CONFIDENTIAL
02 A. It just ends. The dancing is over,

DEPOSITION VIDEOS

03 and then people kind of can journal and process
04 what they were feeling in that -- during that
05 part of the process.

06 Q. What was -- is there anything in
07 addition to what you have already said of your
08 personal reaction to that process?

09 A. My own personal reaction? I mean,
10 I'm not sure if I said that. It was just a
11 really cool and very creative process, like the
12 way I moved with the cloth was -- really
13 brought out like a very sort of sensual energy
14 in me.

15 I think I even laid down with the
16 cloth and kind of imagined having a woman with
17 me kind of dancing with me, like by my side.
18 It really helped me get in touch with the love
19 that I can and now really experience toward
20 women.

21 Q. Was that particular process one of
22 the processes that was most -- that resonated
23 with you most?

24 A. I don't think so. It's hard to
25 really quantify what resonated with me most.

00303:01 HOFFMAN - CONFIDENTIAL

02 Everything was very powerful and impactful.

03 Q. What happened after that process?

04 A. I believe after this -- that
05 process, they are taken to like an open space
06 in woods, and they allow themselves to get in
07 touch with their lover energy during that
08 process.

09 Q. What's the instruction that's given
10 about that?

11 A. Men are blindfolded at the beginning
12 and asked to take off their clothes. It's a
13 new process. The idea being that men, in that
14 place, can feel very at one with earth and the
15 environment around them, because it's in the
16 middle of woods.

17 And the process helps men get really
18 in touch with literally every sense that they
19 are experiencing in the middle of the woods,
20 whether it be the wind on their skin, taste,
21 men are given fruits and things to taste, and
22 to really be in love or use that lover energy
23 to like appreciate my taste buds or appreciate
24 the feeling of my skin and how it reacts to the
25 environment, or appreciate like my feet

00304:01 HOFFMAN - CONFIDENTIAL

02 touching the ground.

03 And then you take off the blindfolds
04 and you see this beautiful woods and appreciate
05 the sight that my body is able to see, and
06 that's considered lover energy, because it's
07 very like appreciative, in tune with the world
08 and with how I'm feeling, and it's how -- it
09 was also a really amazing process.

10 Q. Lover energy is sensual?

11 A. On the weekend, it's considered
12 sensual, yes.

13 Q. Is there any contact between
14 participants during that process?

15 A. No, no.

16 Q. What else does -- what's the right
17 word for people who aren't participants?

18 A. Facilitator, staff member.

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19 Q. Staff member?
20 A. Yeah.
21 Q. What else do the staff members do
22 during that process in addition to perhaps
23 providing some fruit or something?
24 A. They provide smells, like scents.
25 And they help them go through a dialogue where
00305:01 HOFFMAN - CONFIDENTIAL
02 they are told to become a lot more in tune with
03 all their senses in that way.
04 Q. What scents are provided?
05 A. Every sense, from taste, feel,
06 touch --
07 MR. McCOY: Scent.
08 A. Oh, scent. I'm sorry. Flowers,
09 fragrances, natural scents.
10 Q. What else do the -- do the
11 facilitators do if anything, during that
12 process?
13 A. That's it, yeah. There's music, so
14 someone is playing music.
15 Q. Do participants get clothed after
16 that?
17 A. Uh-huh. Yes.
18 Q. In the same clothes?
19 A. Yes.
20 Q. And then what happens?
21 A. Then I believe they are led to
22 dinner.
23 Q. What happens at dinner apart from
24 that they eat?
25 A. Wait a second. Forgive me. There
00306:01 HOFFMAN - CONFIDENTIAL
02 is -- after that, there's psychodrama before
03 dinner. And during psychodrama -- so all this
04 happens, like everything we've described on day
05 three happens in the morning until early
06 afternoon, and then psychodrama, where men are
07 able to kind of look back at everything, and
08 reflect on some of the wounds that they have
09 carried and written down on themselves, and
10 then choose which wound specifically they
11 really feel like they need to work on, and they
12 are given a -- after the psychodrama, they are
13 given a rock, a white rock that represents,
14 like it's a masculine color in response to the
15 yin-yang, black is feminine, white is
16 masculine, don't ask me why, that's just the
17 way it is, and they're given a rock to
18 represent that they've -- it's a token of their
19 mission, their masculine mission, which is
20 something that they become more in touch with
21 after going through the psychodrama.
22 Q. The masculine mission is something
23 individual?
24 A. Yes.
25 Q. Is the mission that we discussed
00307:01 HOFFMAN - CONFIDENTIAL
02 with you earlier a product of Journey Beyond?
03 A. I don't think it was the same. I
04 honestly don't remember what specific mission I
05 had on Journey Beyond, but it was more or less
06 the same idea, if I were to guess.
07 Q. How do the psychodramas in this
08 particular process differ, if at all, from
09 Journey Into Manhood?

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10 A. They don't necessarily.
11 Q. It's individual, based on what
12 wounds the person wants to deal with?
13 A. Correct.
14 Q. What process did you engage in in
15 your initial Journey Into Manhood during
16 that --
17 A. Journey Into Manhood?
18 Q. I'm sorry, Journal Beyond.
19 Which process did you -- was your
20 psychodrama during your initial Journey Beyond?
21 A. It was about getting in touch with
22 the wild side in me, similar to what we've seen
23 in my notes. There was this fun, wild dance
24 that I eventually did with a lot of the men at
25 the end, where I was just like in the middle of
00308:01 HOFFMAN - CONFIDENTIAL
02 the circle, like showing them some of my slick
03 moves, and having some fun with it. And then
04 taking on a message around like just my own
05 kind of fun, wild, crazy side that reflects
06 itself in a healthy way.
07 Q. Was that process clothed?
08 A. Yes.
09 Q. Is there a process that comes to
10 mind during that particular session that
11 involved another man, perhaps, that strikes you
12 as -- that comes to mind first as something
13 that was profound?
14 A. Regarding another man?
15 Q. Yes.
16 A. I think every psychodrama that a man
17 goes through is very profound, but I don't
18 recall anything specific.
19 Q. What happens after that process?
20 A. So then they are taken to dinner and
21 everyone has their white rock, and at the
22 dinner, it's a big like honoring ceremony. It
23 kind of -- it's -- people are kind of feeling
24 this is the completion, like you've reached
25 your pinnacle of masculinity, you've found your
00309:01 HOFFMAN - CONFIDENTIAL
02 mission and your white rock reflects that, and
03 there's sort of like a celebratory dinner where
04 people are like honoring different things.
05 The staff members, in particular,
06 like write down throughout the processes what
07 men have been able to overcome and it's shared,
08 and there's celebration and candy being thrown.
09 It's a lot of good food. And then it sort of
10 feels like, okay, this was the climax of the
11 weekend, like we got to our pinnacle masculine
12 state. That's what the dinner tries to convey.
13 Q. Is the price of this the same as the
14 Journey Into Manhood weekend?
15 A. No, because it's longer, and there's
16 a lot more food that they -- I would say it's
17 maybe \$200 more.
18 Q. So around \$1,000?
19 A. No, 895, I believe.
20 Q. And that's the end?
21 A. Well, it feels like it, but it's
22 definitely not.
23 Q. What happens next?
24 A. Men are asked individually, after
25 the dinner, like they are kind of just

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00310:01 HOFFMAN - CONFIDENTIAL
02 chilling, relaxing, and the staff member kind
03 of all disappear, and the men don't really
04 quite know why. They just, I think, assume
05 that something's about to -- that they're just
06 setting up another process, but a staff member
07 kind of collects a man individually, and takes
08 them outside of the dining room and blindfolds
09 them, and takes them to a lodge where there's a
10 woman inside, a really beautiful, like
11 well-dressed woman, who men are not expecting
12 to be there, and then they're asked to take off
13 their blindfold and to enter, and they are told
14 that you're about to, you know, take a really
15 big step on your work.
16 And it's this point when you open
17 the door that you realize like, life isn't
18 about just getting to my prime masculine state.
19 It's, oh, my gosh, there's actually feminine in
20 my world. And then you see her, and you're
21 already very masculine like charged, because of
22 all the work, and it's just a huge shock, like
23 I'm still stuck in masculinity -- not stuck,
24 but like soaked into it, and then there's a
25 woman, and you sit down with her and she asks a

00311:01 HOFFMAN - CONFIDENTIAL
02 couple questions regarding how the weekend has
03 been going, and then she says something to the
04 effect of would you like to know like the
05 deepest secret about the femininity or like
06 around the feminine world, like would you like
07 to know what's the deepest secret toward life
08 for the feminine world. It's like would you
09 like to know something really deep about
10 living.
11 And men are then -- usually say yes,
12 because they want to know like these secrets,
13 whatever that means, it's just part of the
14 process, and she says, well, I need to take
15 your rock, your mission, in order for you to
16 tell me.
17 So a lot men give over the rock
18 willingly, like they give over the masculine
19 mission, and then she gives you a black rock,
20 which represents her femininity, and she says
21 that the secret to living your life to your
22 fullest will be revealed to you later, and it's
23 sort of like a trick kind of -- it feels that
24 way.
25 And in the room, there's a goblet.

00312:01 HOFFMAN - CONFIDENTIAL
02 This is a complex weekend. In the room,
03 there's a goblet. And throughout the whole
04 weekend there's been sort of this story that
05 you've been following related to King Arthur
06 and like his cup, like the holy grail, it's
07 called, and the holy grail is this idea that --
08 oh, man, I'm giving a lot -- it's hard to like
09 quantify into one discussion, but the holy
10 grail represents this idea that -- it comes
11 from like a higher power a higher source, and
12 one of the things that this man in the stories
13 that we have been following up until now, this
14 whole weekend, is supposed to do, is when he
15 sees this cup, he's supposed to ask, whom does
16 the grail serve.

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17 And there's actually a grail in the
18 woman's room. And when you see the grail, the
19 men who have really been listening to the story
20 actually then should ask that question. And
21 very few men do, because they're too enamored
22 by or too shocked by this feminine energy that
23 has been brought into the weekend.

24 And the idea of that is supposed to,
25 ultimately, at the end of the weekend, show
00313:01 HOFFMAN - CONFIDENTIAL
02 that when you ask whom the grail serves, the
03 idea is that you recognize it through the
04 question, that it doesn't serve me, that it
05 serves something higher.

06 And in unity with me, as a man, and
07 with another woman, we can actually serve
08 together a higher purpose, a higher mission, a
09 higher goal.

10 And that's what the weekend really
11 is all about, getting to that place of
12 recognizing there's a higher power, recognizing
13 that, as a man, I can reach my full potential,
14 and then from that I can connect to a woman.
15 It's not about giving over my mission to her or
16 taking -- or holding on to it and not sharing
17 it with her, but rather it's about asking whom
18 does the grail serve, how can we join together
19 and serve something higher than ourselves.

20 So that's what that whole -- it's
21 complex, you know. You should go on it.

100. PAGE 313:24 TO 317:07 (RUNNING 00:02:53.967)

24 Q. Is it one woman that interacts with
25 every single man?

00314:01 HOFFMAN - CONFIDENTIAL

02 A. No. There's several women.

03 Q. Is she clothed?

04 A. Yes, definitely.

05 Q. Has your wife participated in this?

06 A. Yes.

07 Q. She was the woman?

08 A. She was one time. She staffed twice
09 and she was the woman the second time.

10 Q. What was the experience like for
11 her?

12 A. It was intriguing and positive and
13 it was fun for her.

14 Q. That's the end, or what happens
15 after that?

16 A. No. Then -- that's the end -- that
17 introduces the feminine. Then there's this
18 whole kind of exchange of rocks, whether that
19 happens or not.

20 And then men process what happened
21 all together in a group afterwards, and there's
22 a lot of anger because the woman kind of took
23 the rock from me. There's a lot of joy that
24 the woman took the rock from me. And you see
25 all these reactions and they are really

00315:01 HOFFMAN - CONFIDENTIAL

02 processing like what just happened in this
03 feminine idea and this feminine world, because,
04 really, the biggest belief out of a lot of this
05 work is that men and woman are different, you
06 know, they're not the same, but they're equally
07 valuable. They're equal in value, but they

DEPOSITION VIDEOS

08 actually have different things that they bring
09 to the table in connection to them, and
10 opposites attract, and that's what creates
11 attraction.

12 So men are finally introduced to
13 that in this room where they can start to
14 process that. And that's what happens next
15 after that.

16 Q. What was your take-away from the
17 interaction with the woman? You weren't
18 supposed to give up your power?

19 A. I actually kept on to my mission. I
20 believe that I'm not supposed to let it go, but
21 that was also mistaken, because I felt it was
22 just for me and not for a higher power. If I
23 would have seen the grail and be that cup, that
24 goblet, have been more cognizant of the story
25 and the idea that whom the grail served is a

00316:01 HOFFMAN - CONFIDENTIAL

02 recognition or a statement that it's not about
03 me, I would have been able to ask the question
04 instead of keep on to my mission, and not want
05 to share it with the woman.

06 I thought it was ingenious,
07 actually, the way they kind of brought that
08 lesson out. So it was a very powerful moment
09 for me, opening that door and seeing this
10 really beautiful woman there, being very
11 attracted to her, and having that whole
12 experience.

13 Q. Is she dressed in a particular way
14 or each woman can --

15 A. The goal is to dress kind of like in
16 a gown -- not a gown, like a ballroom gown,
17 like a very fancy, kind of womanly dress, kind
18 of like they were going to a wedding perhaps.
19 Look very modest and feminine, in that way.

20 Q. How does she look when the person
21 walks in?

22 A. She looks enamorous and captivating.

23 Q. Is she on a pedestal?

24 A. No. She's just sitting on a chair,
25 yeah.

00317:01 HOFFMAN - CONFIDENTIAL

02 Q. And then what happens?

03 A. The man sits down and has that
04 dialogue that I described.

05 Q. I think -- is there anything else
06 that happens in that happens in that process?

07 A. No.

101. PAGE 320:06 TO 322:02 (RUNNING 00:01:55.033)

06 Q. Just high level, what happens the
07 whole next day?

08 A. It's all about women. The women
09 that were in the lodges and then other women
10 that came to staff the weekend lead, basically,
11 all sorts of processes to help men interact
12 with woman from this place of I'm a masculine
13 man and you're a feminine woman, I can honor
14 you and I'm going to show you my
15 vulnerabilities, I'm going to show you my
16 wounds and connect you in that way, and
17 experience this sort of just lively and real
18 unification that is really awesome. It's a
19 really -- that's kind of when the climax hits.

DEPOSITION VIDEOS

20 And then they're taught, again, the
21 importances of having that unification not just
22 be about itself, but serving something higher,
23 serving a higher power, a higher force, and
24 then creating, from that unification, a mission
25 from there, knowing that that can be possible.
00321:01 HOFFMAN - CONFIDENTIAL
02 So it's really a weekend all about
03 helping a person go above ego, go above even
04 unification with a woman, which is extremely
05 important, but recognizing that that all can be
06 for a much higher purpose, and not just an ends
07 to itself, and I think that's a really integral
08 lesson that anyone can really learn throughout
09 their lives, really, and that's why I think the
10 weekend is just about life. You know, it's
11 about life in general.
12 Q. How is the unification with women
13 experienced?
14 A. Through first processing a lot of
15 the deep wounding around women and getting
16 beyond that, and then sort of a celebratory
17 dance to a degree, and -- is at the very end.
18 So various processes, but the dance is a kind
19 of a big thing, and fighting through the
20 wounds.
21 Q. Is that dance clothed?
22 A. Yes, yes. The whole day is clothed.
23 Q. What happens after that, if
24 anything?
25 A. So that's really the end of the
00322:01 HOFFMAN - CONFIDENTIAL
02 weekend, yeah.

102. PAGE 322:03 TO 322:23 (RUNNING 00:00:59.367)

03 Q. So going back to your statement
04 earlier that Journey Beyond was a significant
05 aspect of your sexual orientation change
06 efforts, can you articulate a little bit more
07 of what it is that you took away from all of
08 that?
09 A. Exactly what I just said, this idea
10 that I can unify with a woman from a place of
11 very strong, secure masculinity, and then
12 within that unification, and that love and that
13 care that we have for each other, we can then
14 serve an even higher purpose between -- with
15 each other, whether that be family or outreach
16 in the communities, helping others, following
17 God's will, that what we consider to be God's
18 will, and that is something that sticks with me
19 my whole entire life now. And that weekend
20 really encapsulated it in a very impactful and
21 experiential way. I don't think there ever has
22 been a weekend that I have been able to really
23 do that as well as it has.

103. PAGE 325:23 TO 326:21 (RUNNING 00:00:49.033)

23 Q. Is there any structured healthy
24 touch during Journey Beyond?
25 A. Structure, no. Because, at that
00326:01 HOFFMAN - CONFIDENTIAL
02 point, it's not about discovering that to be
03 something that you can have in your life. It's
04 more about men are already at a place where
05 like they're incorporating that into just their

DEPOSITION VIDEOS

06 daily living with men if it's something that
07 they feel they want and need and can enact
08 healthfully.
09 So on the weekend, you see a lot of
10 men, you know, being together physically in a
11 nonsexual and healthy sort of way, but the
12 weekend doesn't need to incorporate that as a
13 structure, because men are already at that
14 point, where it's become their everyday living.
15 Q. Some of the healthy touch occurs
16 during the naked sessions?
17 A. No.
18 Q. Not at all?
19 A. Yeah, that's not -- I think that's
20 deliberate, because I don't think that would be
21 healthy touch the way it's described.

104. PAGE 328:03 TO 328:06 (RUNNING 00:00:08.633)

03 Q. I would like to go into a little
04 more what you talked about with you and
05 Michael, just a few things.
06 A. Sure.

105. PAGE 328:07 TO 328:18 (RUNNING 00:00:29.467)

07 Q. You moved to New York City in order
08 to be closer to Michael?
09 A. That's not why I moved to New York
10 City.
11 Q. You found an apartment near him?
12 A. No.
13 Q. How far away was it?
14 A. It was in my dorm at my college that
15 I wanted to attend. That's why I moved to New
16 York City, to be in Lander College where I got
17 my undergrad in psychology. That was about 25,
18 30-minute drive from him.

106. PAGE 328:19 TO 330:04 (RUNNING 00:01:06.600)

19 Q. You spent hours cuddling with
20 Michael?
21 A. Yes.
22 Q. Approximately how long were the two
23 of you in a physical relationship together?
24 A. A physical or a sexual?
25 Q. Physical.
00329:01 HOFFMAN
02 A. Probably a couple weeks into the
03 friendship, which was, again, it was like a
04 three-month ordeal, I would estimate.
05 Q. And how long were the two of you
06 sexual with each other?
07 A. For around two months.
08 Q. During those sessions, you made out
09 with Michael?
10 A. Yes.
11 Q. You got naked with Michael during --
12 sometimes?
13 A. Yes.
14 Q. You slept together frequently?
15 A. Yes. By sleeping, you mean just
16 sleeping, right?
17 Q. Yeah.
18 A. Yes.
19 Q. And sometimes you slept together
20 without clothes?

DEPOSITION VIDEOS

21 A. I don't think we ever slept
22 completely naked. I think there might have
23 been a couple times where we slept without
24 shirts on.
25 Q. Michael's roommates assumed that the
00330:01 HOFFMAN
02 two of you were boyfriends?
03 A. That might have been a concern. I
04 never verified it.

107. PAGE 330:09 TO 330:13 (RUNNING 00:00:16.566)

09 Q. Do you fault Michael for instigating
10 the relationship you developed?
11 A. I fault myself and Michael. It was
12 a -- it was a -- I don't fault anyone. I think
13 it was just a byproduct of the two of us.

108. PAGE 330:22 TO 330:25 (RUNNING 00:00:11.967)

22 Q. How did you meet Preston Dahlgren?
23 A. I met him staffing one of his
24 weekends, the first JIM weekend that I staffed,
25 actually, in Virginia.

109. PAGE 331:21 TO 333:04 (RUNNING 00:01:11.359)

21 Q. It came to pass that you visited
22 Preston on one or more occasions in Utah?
23 A. Yes.
24 Q. How many times?
25 A. I believe three times I flew out to
00332:01 HOFFMAN
02 visit him.
03 Q. And that was over the course of
04 several days each time?
05 A. It was like two days, two, three
06 days.
07 Q. Did you stay with him?
08 A. I stayed in his apartment -- his
09 house.
10 Q. With his wife?
11 A. Yes.
12 Q. Were there certain things about
13 Preston that attracted you?
14 A. At the time, I was -- I thought he
15 was physically attractive, but I was more
16 attracted to his personality and himself, and I
17 think -- like I said, with Michael, I was even
18 perhaps just as, if not a little more wounded
19 around my codependency issues.
20 After all, the time that I staffed
21 his weekend, I literally just did my own JIM
22 weekend a couple months ago. So I was still
23 very much a beginner in this work, and I still
24 had a lot of wounding around emotional
25 relationships between men that were very
00333:01 HOFFMAN
02 present.
03 So that reflected itself in Preston
04 and certainly then with Michael.

110. PAGE 333:22 TO 334:05 (RUNNING 00:00:18.298)

22 Q. You participated in healthy holding
23 with Preston?
24 A. Yes.
25 Q. That holding was alone with him?
00334:01 HOFFMAN

DEPOSITION VIDEOS

02 A. There were occasions that it was,
03 yes.
04 Q. That holding lasted an hour or more?
05 A. Yes, uh-huh.

111. PAGE 334:19 TO 334:21 (RUNNING 00:00:04.598)

19 Q. You engage in any sexual activity
20 with Preston?
21 A. No.

112. PAGE 335:06 TO 335:22 (RUNNING 00:00:48.667)

06 Q. What happened to make that -- your
07 visits to Preston end?
08 A. Oh. I was codependent. A lot of
09 those issues came out, then. Created a lot of
10 emotional conflict in the relationship. He
11 took a step back, understandably. I made
12 mistakes with that, not at all to the severity
13 that I made with Michael, but there was a lot
14 of drama because of it. And I created it. You
15 know, I was very wounded still then, and
16 learning a lot about all of that.
17 So he took a step back. That hurt
18 me. It was like a really silly situation. And
19 it ended it. And we had kind of like a
20 fall-out, and that was definitely a part of my
21 journey, you know, processing that, learning
22 from the mistakes, going through it.

113. PAGE 337:13 TO 338:04 (RUNNING 00:00:33.966)

13 Q. Who is Josh Chadwick?
14 A. He was a friend of Preston
15 Dahlgren's and he eventually became a friend of
16 mine.
17 Q. Preston introduced you to Josh?
18 A. He went on a weekend with Josh
19 Chadwick. No, excuse me. He encouraged him to
20 go on a -- he went on the same weekend that
21 Michael Ferguson was on.
22 Q. You knew that Josh was coming to
23 that weekend before you met him?
24 A. Yes.
25 Q. You were watching for him?
00338:01 HOFFMAN
02 A. I wasn't watching for him. I just
03 knew that he was coming, I guess, you know --
04 yeah.

114. PAGE 338:22 TO 339:06 (RUNNING 00:00:31.900)

22 Q. This was in the summer of 2008 that
23 you first met Josh?
24 A. I first met Josh at Michael's JIM
25 weekend, which was in 2007, I think. Yeah,
00339:01 HOFFMAN
02 2007, I believe. That's when -- no, no, no.
03 I'm sorry. It was in the spring or
04 February 2008, because he was on Michael's
05 weekend. So whenever Michael's weekend was,
06 that's when I met Josh.

115. PAGE 340:09 TO 340:14 (RUNNING 00:00:18.567)

09 Q. Did you suggest that you go visit
10 Josh Chadwick in Salt Lake City?
11 A. Did I suggest that I go visit him?

DEPOSITION VIDEOS

12 We became friends, and that might have been
13 suggested. Sure, but we didn't maintain the
14 friendship for that long.

116. PAGE 341:03 TO 341:19 (RUNNING 00:00:37.500)

03 Q. You invited Josh to come visit you
04 in Dallas, Texas?
05 A. Yes.
06 Q. To your family's home?
07 A. Yes.
08 Q. And Josh visited you at your
09 family's home in September of 2010?
10 A. Was it 2010? I think it was 2009.
11 2010. 2010 was when I got -- oh, excuse me,
12 yeah, it was 2010, yeah.
13 Q. September, correct?
14 A. Yes, during high holidays, yeah.
15 Q. He stayed with you for a week and a
16 half?
17 A. No, not that long. I think he
18 stayed for like a couple of days, maybe four or
19 five days. Not a week and a half, though.

117. PAGE 343:02 TO 343:25 (RUNNING 00:00:46.900)

02 Q. You cuddled with Josh?
03 A. We had physical interactions, yeah.
04 Q. When Josh visited, you took him up
05 to your guest bedroom on the second floor?
06 A. Yes.
07 Q. Most every night, he was there?
08 A. Yes.
09 Q. It's isolated from the rest of the
10 house?
11 A. To a degree, yeah.
12 Q. You would lock the door and take off
13 your clothes?
14 A. We did, yes.
15 Q. So would Josh?
16 A. Yeah.
17 Q. And you would cuddle with Josh
18 naked?
19 A. Yes.
20 Q. And you would kiss Josh?
21 A. There was very minimal kissing.
22 Q. You had oral sex with Josh?
23 A. No.
24 Q. Are you sure?
25 A. Yes.

118. PAGE 344:11 TO 345:18 (RUNNING 00:01:27.967)

11 Q. What inappropriate things happened
12 with Josh?
13 A. Primarily, the rubbing against each
14 other, masturbating with each other types of
15 things.
16 Q. Why didn't you have oral sex with
17 him?
18 A. It was -- it was a boundary that I
19 was trying to maintain. I knew, at the time,
20 that it was something that was venturing into
21 unhealthy territory as well.
22 Q. What else did you do that was
23 inappropriate with Josh?
24 A. We masturbated each other. We
25 kissed. We really flirted with -- at that

DEPOSITION VIDEOS

00345:01 HOFFMAN
02 time, that was in 2009, it was a very -- one of
03 my bigger slip-ups as well. It was -- I think
04 that was around the same time that I mentioned
05 before, is when I stopped acting out with other
06 men, but he was one of the biggest mistakes, a
07 really large mistake that I made as well. Two
08 steps forward, one step back was very
09 applicable to him.
10 So we -- like I said, we engaged in
11 sexual release with each other, but I never
12 performed oral sex with him.
13 Q. One of your biggest slip-ups?
14 A. Yeah, I think it was.
15 Q. What were the others?
16 A. That Michael was a slip-up, and then
17 the times I acted out with strangers and
18 hookups I considered to be a slip-up.

119. PAGE 346:17 TO 346:25 (RUNNING 00:00:17.233)

17 Q. By slip-ups, you mean sexual
18 activity?
19 A. Yeah, uh-huh.
20 Q. By slip-ups, you mean sometimes oral
21 sex?
22 A. With men? Yes, sure.
23 Q. By slip-ups, you mean some anal
24 penetration?
25 A. Yes, uh-huh.

120. PAGE 347:24 TO 348:25 (RUNNING 00:01:10.733)

24 Q. Before your time with Josh, you'd
25 claimed to be successful towards becoming
00348:01 HOFFMAN
02 heterosexual?
03 A. It's possible that I said that,
04 sure.
05 Q. And prior to Josh, you'd claimed to
06 be a role model that change is possible?
07 A. I don't think I ever said, like,
08 hey, Josh, I'm like a prime role model.
09 Q. Not to Josh, but to others.
10 A. It was a perception that people gave
11 to me, but I never went around waving a flag
12 saying I'm like a success story. I don't
13 really like even to do that just because I
14 don't like to identify myself solely as being
15 this type of man I think I'm more than that,
16 but people perceive me as that, I can
17 understand, because I was trying to do the
18 work. I was, you know, trying to move forward.
19 It wasn't ever a clear upward path,
20 though. I had many mistakes. I had many falls
21 along the way, which are clearly being, you
22 know, exposed right now, and I'm happy to talk
23 about them, but that's -- so, you know, I guess
24 if men were -- yeah, so that's all I have to
25 say to that, yeah.

121. PAGE 351:08 TO 351:21 (RUNNING 00:00:34.566)

08 Q. Since you've been married, you told
09 Josh that you screw up sometimes and make
10 mistakes?
11 A. We had one chat, which was, if I
12 recall, it was the first year I was married,

DEPOSITION VIDEOS

13 where he asked me how I was doing. And he
14 said, do you really find your wife attractive.
15 And I said yes, and I'm doing really well.
16 And I said, and I admit the fact
17 that, with you, I flirted with the idea of not
18 doing this, because I was in that lull, but I
19 said, I'm really moving on. And we had a
20 conversation I could try to pull it up.
21 But, yeah, I admitted that, sure.

122. PAGE 352:04 TO 352:15 (RUNNING 00:00:25.966)

04 Q. Did you tell Josh, since you've been
05 married, that you sometimes screw up and make
06 mistakes?
07 A. With being married today?
08 Q. Yes.
09 A. No, no.
10 Q. You've met guys at the gym?
11 A. No. I mean, friends at the gym, I
12 guess, but never like --
13 Q. You've not played with anyone in the
14 showers, nothing like that?
15 A. No, no, I have not.

123. PAGE 358:02 TO 360:13 (RUNNING 00:02:30.633)

02 Q. Over the course of your sexual
03 orientation change efforts, you've had many
04 male partners?
05 A. Yeah. I mean, that was a big part
06 of my -- my journey, was having a lot of falls,
07 flare-ups in that way, and having periods where
08 I would allow myself to engage in that.
09 It was not how I think everyone
10 navigates this journey, you know, through so
11 many falls, but I was coming from a very
12 addictive place when I was younger, doing this
13 a lot, and it was hard to always maintain it
14 and to always apply the work.
15 And it would be frustrating. It
16 would be, you know, it would be hard at times,
17 and there were mistakes that were made, but I
18 always did my best to understand it, learn from
19 it, grow.
20 So my journey doesn't look like --
21 it ever looked like, a kind of straight line
22 upwards, and I think that's what a journey
23 really is. It's never a straight line upwards.
24 It's always a lot of ups and downs, and
25 hopefully you are getting higher and higher,
00359:01 HOFFMAN
02 but sometimes taking falls and step-backs.
03 Q. What's the man's name who lives in
04 London with red hair?
05 A. Keenan? Keenan is one of my best
06 friends.
07 Q. You met Keenan at Journey Into
08 Manhood?
09 A. Yes. I staffed his Journey Into
10 Manhood weekend in London. It must have been
11 either 2011, if I recall. We've been friends
12 for about two years now.
13 Q. You've visited Keenan in London?
14 A. Once, yes.
15 Q. He has visited you in Israel?
16 A. Yes.
17 Q. What did you do together in London?

DEPOSITION VIDEOS

18 A. We had one of the greatest times
19 I've had with friends. Like we just -- we
20 really click. He's one of my favorite people
21 in the world. And we have the same
22 personalities. We went around London.
23 We just had a really great time. We
24 watched movies together. We just total,
25 total -- when I think of one of my best
00360:01 HOFFMAN
02 friends, it's him.
03 Q. You cuddled together?
04 A. Yeah. Yeah, sure. We have that
05 sort of connection. We're like -- we just kind
06 of, hey, let's watch a movie, and we kind of
07 jumped on the couch and kind of cuddle up and
08 just have this cute like brotherly connection.
09 I love it. I love it. He's one of my favorite
10 people.
11 Q. You slept with him?
12 A. Yeah, sure, in the same bed. They
13 have one bed, yeah, cuddle, slept, sure.

124. PAGE 360:14 TO 360:24 (RUNNING 00:00:27.400)

14 Q. You kissed him?
15 A. No, no, never. That's nothing I
16 would ever do with a friend that close anymore,
17 thankfully. He's a good friend that I have
18 been able to really feel like a big difference
19 from before with Josh and Michael, to now where
20 the growth has really kind of taken its place.
21 Keenan is a really good embodiment
22 of someone whose -- who models for me what type
23 of really intimate close friendship can be
24 like.

125. PAGE 363:15 TO 367:23 (RUNNING 00:04:12.167)

15 Q. This is an e-mail that you wrote to
16 your father?
17 A. Correct.
18 Q. The day after you had spoken with
19 Arthur Goldberg for the first time by phone?
20 A. That is correct.
21 Q. The main purpose of the e-mail was
22 to ask your father to help pay for sessions
23 with JONAH?
24 A. That was the biggest intent, but I
25 thought it was a big step in my starting this
00364:01 HOFFMAN
02 journey, by like coming out to my father,
03 telling him what's going on. So it was
04 combined.
05 Q. You told your father that you
06 definitely have the right attractions for the
07 opposite sex?
08 A. I think that was me trying to like
09 convince myself that that was there, but at the
10 time, same sex attractions were incredibly
11 stronger. Almost a world apart. And opposite
12 sex attractions were very minimal.
13 Q. You told your father that SSA is
14 something that you had to get rid of?
15 A. At the time, I really felt that way,
16 yeah, of course. I was a beginner in all of
17 this, you know.
18 Q. Mr. Goldberg told you it was
19 something you could get rid of?

DEPOSITION VIDEOS

20 A. He explained to me the journey and
21 what can be done, and that was the implication,
22 sure.
23 Q. Mr. Goldberg told you that this was
24 definitely something that you weren't born
25 with?

00365:01 HOFFMAN
02 A. Yeah. Yes.
03 Q. That your homosexuality had do with
04 how you grew up in your childhood?
05 A. He mentioned all sorts of factors,
06 and that's what I understood.
07 Q. Mr. Goldberg told you that he'd
08 helped thousands of people who have become
09 ex-gay and used to live a homosexual lifestyle,
10 but now, through therapy, have changed?
11 A. I could have said thousands. I
12 don't recall him telling me that. He might
13 have said that, but I don't think that it's
14 something that he would have said. It could
15 have just been me trying to exaggerate the
16 success so that my father would be interested
17 and have a desire to enroll me in the program.
18 Q. Were you being truthful in this
19 letter to your father?
20 A. Not a hundred percent, clearly. No,
21 I was wanting the money. I was wanting to
22 convince him. I was wanting his support. So I
23 also wasn't -- I was very new with the
24 understanding of the process.
25 So in this letter, I very much

00366:01 HOFFMAN
02 perhaps had this mentality that is a little
03 more like it's a quicker process than a
04 journey, but that was something I learned over
05 time by being part of the work, that it is,
06 actually, in fact, not.
07 Q. You were willing to not be honest
08 with your father in order to get him to pay for
09 sessions?
10 A. That's not at all what I'm saying.
11 It's that I was exaggerating certain things
12 about perhaps the success, just so that, again,
13 to be interested, but I mean, overall, I think
14 I was as, you know, truthful -- I was truthful.
15 Sending him this e-mail, I just want
16 to be clear, like I knew he would support me.
17 I knew he would want to support me, and to give
18 me the funds. So I never came -- I never wrote
19 the e-mail with the intention that I have to be
20 untruthful and finagle him to give me money.
21 Q. You've exaggerated the success of
22 JONAH in order to get other people interested?
23 A. No, no, I don't -- I never go around
24 touting success. I don't think it's helpful.
25 You know, I think a person, on an individual

00367:01 HOFFMAN
02 level, is going to discover what that is. I
03 don't do that.
04 Q. What are JONAH's success rates in
05 changing people's sexual orientation?
06 A. I think they have a high success
07 rate. I think, like I said, with the group
08 that I was a part of, you know, 60 percent. I
09 don't really think about it so much, to be
10 quite honest.

DEPOSITION VIDEOS

11 I think that some people can change.
12 I think a lot of people do. And I think it's
13 helpful.
14 Q. What's the 60 percent based on?
15 A. The group that I was in, thinking
16 about the group participants and how many are
17 seeing success today and moving forward with
18 this.
19 Q. Did you make some tabulation of
20 success or write down something to base that
21 on?
22 A. No. I never wrote anything down
23 about it. It's just something I think about.

126. PAGE 367:24 TO 368:10 (RUNNING 00:00:26.133)

24 Q. That's anecdotal?
25 A. You can call it -- I mean, I'm
00368:01 HOFFMAN
02 thinking about the group that I was in. I'm
03 thinking about the tons of men that I've met.
04 I've met hundreds of men, I think, throughout
05 the JIM and the JONAH process who have clearly
06 seen success moving forward. I've seen a lot
07 of marriages. I've seen a lot of kids come
08 from this work.
09 You're welcome to call it anecdotal.
10 I call it my reality.

127. PAGE 374:13 TO 375:18 (RUNNING 00:01:17.970)

13 Q. What is Dr. Goldberg a doctor of?
14 A. I don't really know. I'm not sure
15 why -- I must have thought him as a doctor
16 then, because when I was speaking to him, my
17 impression was that he was like some sort of
18 psychologist and, therefore, a doctor, because
19 I assumed anyone that helps men with like a
20 psychological condition has to be a
21 psychologist. I was very young at the time.
22 It definitely wasn't because he told
23 me, hey, I'm a doctor, like I'm going to heal
24 you.
00375:01 Q. Did you call him Dr. Goldberg during
HOFFMAN
02 your discussion?
03 A. It's possible, because I didn't know
04 who he really was.
05 Q. He didn't correct you?
06 A. He might have.
07 Q. Mr. Goldberg told you that he would
08 help you get professional therapy?
09 A. He told me that JONAH is a resource
10 for guiding men toward therapists that help you
11 or life coaches that help you with -- yeah,
12 with healing unwanted same sex attractions.
13 Q. He told you that the therapy cost
14 about \$150 per session?
15 A. Correct.
16 Q. Did he tell you that JONAH receives
17 a portion of that?
18 A. No, he did not.

128. PAGE 376:24 TO 377:12 (RUNNING 00:00:31.693)

24 Q. Some of the things that Mr. Goldberg
25 told you to do was to join the Listserv?
00377:01 HOFFMAN

DEPOSITION VIDEOS

02 A. Correct.
03 Q. Did your father call Mr. Goldberg?
04 A. I think so.
05 Q. Did you have a discussion with your
06 father after that conversation?
07 A. Did I have a discussion with him?
08 Of course. I spoke to my father many times
09 after this e-mail.
10 Q. And your father was convinced, after
11 that conversation, to pay for your sessions?
12 A. Convinced? He wanted to help me.

129. PAGE 378:12 TO 380:08 (RUNNING 00:01:50.300)

12 Q. He sounded like he knew -- he
13 sounded authoritative?
14 A. I didn't say that. He sounded
15 loving and caring and kind of grandfatherly, if
16 anything. He didn't sound authoritative.
17 Q. He sounded like a doctor knowing
18 what he was talking about with respect to same
19 sex attraction?
20 A. Again, I wouldn't describe it as
21 that. I would describe it as a man who's
22 really caring, really loving, grandfatherly.
23 He knows a lot about people's success. He
24 knows a lot about what can constitute same sex
25 attractions for some men, and he was really and
00379:01 HOFFMAN
02 happy to offer me those resources.
03 Q. Mr. Goldberg is an honest person?
04 A. I believe he is honest, yes.
05 Q. You never know him to have been
06 dishonest?
07 A. No.
08 Q. I just have a couple more questions.
09 Mr. Goldberg, at the top of 82, he
10 told you that he's healed many, many guys like
11 me.
12 A. Again, this is me not exactly
13 knowing who Arthur Goldberg was, how he worked.
14 I only spoke to him on the phone, and I made a
15 lot of assumptions about him, some of which
16 that he kind of, you know, he takes people and
17 healed them, but what was very clear to me,
18 especially after I got my father's support that
19 I could have funding and whatnot, was that
20 Arthur is simply a man who knows a lot about
21 this, and who has a lot of connections to life
22 coaches and therapists, and he is really happy
23 to share that knowledge with you, so that you
24 can then find one that's actually effective and
25 willing to help you with your dreams and values
00380:01 HOFFMAN
02 and goals.
03 So that's what he was, and that's
04 what he became. At this e-mail, there was very
05 little that I knew about him. It was only my
06 first conversation with him, and I'm literally
07 just starting this journey. So there's a lot
08 that I didn't know about how it worked.

130. PAGE 381:02 TO 383:21 (RUNNING 00:03:26.133)

02 Q. Would you please just read that
03 whole paragraph after it says Chaim on the
04 front page of this exhibit?
05 A. Sure. "Chaim, I care for you very

DEPOSITION VIDEOS

06 much, and looking forward to the day when I can
07 consider you a trustworthy friend again. And I
08 mean this wholeheartedly. But if you start a
09 tirade against JONAH for the sole purpose of
10 bringing it to the ground, you will face a lot
11 of serious opposition from me. I have a lot of
12 data, evidence and support to rally together to
13 go against many of your claims that will make
14 you look way more shaky than you are claiming
15 JONAH to be. I don't want to start a war with
16 you. But for my safety and the safety of men I
17 deeply care about, I will do so if I have to.
18 Think about it. I really hope you choose a
19 more peaceful route, Jonathan."

20 Q. What did you have in mind to make
21 Chaim look more shaky?

22 A. Everything that has come out today
23 in my direct is what I judge to be things that
24 go really strongly against his claims, because
25 I knew him as a man who was very much not this

00382:01 HOFFMAN
02 new man that he was portraying himself to be,
03 and I felt that he was in this new -- in
04 February 2012, doing things that were literally
05 going to start affecting my own resources and
06 tools that helped me, that helped me grow, and
07 he has and he still is.

08 And that is a huge threat to my --
09 my journey, to my -- to the stuff that has
10 helped me and the stuff that I hold dear to my
11 heart, and I'm not just going to sit by and let
12 it happen. That's exactly what I was saying,
13 and that's kind of why I'm here today.

14 Q. Sexual orientation change efforts
15 are your future livelihood, correct?

16 A. They are not solely my future
17 livelihood, but I would be happy to and willing
18 to help men go through the same process I went
19 through, but I really hope to help tons of
20 individuals with a wide range of problems.

21 Q. Is there anything other than what
22 you have said about Chaim that would make him
23 look more shaky?

24 A. My intention isn't to make him look
25 shaky and terrible. I really do love the guy,

00383:01 HOFFMAN
02 but -- and I think I've said everything, more
03 or less. Yeah, it's tough.

04 I will say one thing, actually, that
05 I think is really important, that he's very big
06 on -- on not helping others on the backs of
07 hurting others. That's a very big statement
08 that I hear him say all the time. Helping
09 others on the backs of hurting others, this
10 idea. And that's what he thinks we're doing.

11 But that's exactly what he's doing
12 to me right now, and that's what you guys are
13 doing, in my opinion, to us. You're trying to
14 help people by hurting people like myself.

15 I would say, you know, that that's
16 really shaky, you know, it's somewhat
17 hypocritical, and it's hurtful, quite frankly.

18 Q. It's your intention to defeat this
19 lawsuit?

20 A. It's my intention to do whatever I
21 can to help defeat it, yes.

DEPOSITION VIDEOS

131. PAGE 384:17 TO 386:21 (RUNNING 00:02:25.867)

17 Q. How many JONAH Shabbatons have you
18 gone on?
19 A. I went on one, and I staffed, I
20 think, three of them.
21 Q. Have you ever had an erotic
22 experience in a mikvah?
23 A. No.
24 Q. No one has ever approached you in an
25 overly friendly way?
00385:01 HOFFMAN
02 A. No.
03 Q. Your first JIM weekend was the same
04 as Chaim's first JIM weekend?
05 A. Correct.
06 Q. Were you present for -- or do you
07 recall any specific processes of Chaim's first
08 JIM weekend that you were present for?
09 A. I mean, all the group processes.
10 Obviously, that involved us all together, and I
11 don't recall if we were on the same
12 psychodrama, to be honest. It's possible, but
13 I don't recall.
14 Q. You don't recall any specific
15 processes that Chaim went through involving
16 psychodrama, for example?
17 A. Not psychodrama, I don't, no.
18 Q. Guts work?
19 A. Right, the same thing.
20 Q. Right. Are there any specific
21 memories of Chaim from his first JIM weekend
22 that stand out to you?
23 A. Yeah, yes. How much he loved it.
24 How much benefit he was gaining from the
25 weekend, and just his overall kind of
00386:01 HOFFMAN
02 contagious enthusiasm.
03 Q. Anything else?
04 A. I remember that his -- the Friday
05 night when we were introduced to healthy
06 holding, how Alan was extremely sensitive with
07 Chaim and just kind of sat with him and talked
08 to him, because it definitely hit on a deep
09 part of him, and I saw like a very deep
10 sensitivity from Alan being given to Chaim, and
11 just sort of this care, like I know this is
12 hard for you, and I'm here for you, sort of --
13 and I remember that incident pretty well,
14 because I was watching it, and I cared about
15 Chaim at the time, too. So it was great to see
16 that he was getting that sort of support from
17 Alan.
18 Q. How close were you sitting to those
19 two?
20 A. Across the room, maybe. Maybe
21 like -- not so far, but not next to him.

132. PAGE 388:14 TO 389:13 (RUNNING 00:00:51.867)

14 Q. You helped tie Michael up?
15 A. I was -- I helped him with the
16 psychodrama. I don't recall if I actually tied
17 him up, so --
18 Q. How long did it take him to break
19 free?
20 A. A good five minutes, maybe. I don't

DEPOSITION VIDEOS

21 really recall the specifics, but I do recall
22 that it was empowering for him, and he
23 really -- like, he cut that rope and he really
24 got through it and came out in a much better
25 place in relation to his mom, and it was a
00389:01 HOFFMAN
02 great -- it was a great process for him from
03 what I could see.
04 Q. What was the dynamic when he broke
05 free? What were other participants doing at
06 that moment?
07 A. Cheering for him. Like good going.
08 You broke this really negative message that you
09 have around your mom, and now you can hopefully
10 strive for a healthier connection to her.
11 Q. Do you recall specifically what the
12 negative message was?
13 A. No, I don't recall specifically.

133. PAGE 390:03 TO 390:19 (RUNNING 00:00:51.800)

03 Q. Is there anything else that stands
04 out in your memory about Michael Ferguson's
05 Journey Into Manhood weekend?
06 A. That he was a very like deep
07 thinker, soaking in the weekend very well, and
08 that it was an extremely positive experience
09 for him overall.
10 Q. Anything else?
11 A. No.
12 Q. You said something to the effect
13 that, in recent years, nudity processes have
14 been brought up less in Journey Into Manhood?
15 A. Correct.
16 Q. What do you mean?
17 A. Well, with the reputation that they
18 seem to have gained in the outside public and
19 the misrepresentation o them.

134. PAGE 391:05 TO 394:07 (RUNNING 00:03:16.290)

05 Q. When is the most recent nudity
06 exercise you can recall from Journey Into
07 Manhood?
08 A. Maybe two years ago, it was.
09 Q. What do you recall?
10 A. A participant needed to feel like
11 loved and affirmed for the body he had. I
12 think he was overweight. And he had a very
13 hard time with his body as a result. And we
14 kind of reenacted a locker room scene, where
15 people were -- first of all, the participants
16 were told what's about to happen, and he was
17 also told that this might include that, and if
18 he's comfortable with it, and we invited those
19 participants who were comfortable with that to
20 stay, and those who aren't, to go out.
21 And I think it was split like half
22 and half, some participants went up, several
23 stayed, and we kind of recreated this whole
24 locker room sort of scene where we just kind of
25 sat around and talked about what we see and
00392:01 HOFFMAN
02 affirmed each other's vulnerability. And it
03 was a really, really positive process for this
04 man. He was really able to get in touch with
05 an aspect of him that's deeper than just his
06 body.

DEPOSITION VIDEOS

07 Q. Mr. Wyler led that session?
08 A. No.
09 Q. Who did?
10 A. Arthur Goldberg was there. And also
11 another -- I think it was someone else. I
12 don't really recall who, but it was him in
13 conjunction with someone else, and I can't
14 recall who the person was.
15 Q. Mr. Goldberg was leading the
16 session?
17 A. In conjunction with someone else.
18 Q. Everyone was naked?
19 A. The people that stayed, yes, were.
20 Q. For how long, approximately?
21 A. Twenty minutes.
22 Q. And the time before that, if you
23 recall, that there was nudity at Journey Into
24 Manhood?
25 A. In Journey Into Manhood? There was
00393:01 HOFFMAN
02 once a man who, completely on his own, like
03 stripped down. We didn't even see it coming,
04 but we told the participants that he is doing
05 this, and he wants to do this, and kind of the
06 same sort of setup, and he completely bared
07 all, and we did not even -- like encourage it,
08 but it was just his way of being vulnerable.
09 Again, like vulnerability and nudity often go
10 hand in hand. And so this man did it in the
11 process.
12 I think that was the only other time
13 I actually recall, out of all JIMs that I've
14 have been on that that's happened.
15 Q. Briefly, if you can, what are
16 unhealthy ways to overcome SSA that you
17 referred to earlier in contrast to the
18 defendants' program that you said was
19 effective?
20 A. Sure. Shock therapy, aversion
21 therapy, pray it away, looking at pictures that
22 like are pornographic and then like shocking.
23 I think I said that already. Suppression
24 methods, rubber band snaps.
25 Again, pray it away, by that I mean
00394:01 HOFFMAN
02 only turning to religion, and not looking
03 outside for effective therapeutic resources and
04 thinking that God is just going to take it away
05 on his own if you pray hard enough.
06 Just a lot of stuff that if you
07 Google it, you will read.

135. PAGE 394:25 TO 395:11 (RUNNING 00:00:34.077)

25 Q. Your testimony earlier was that even
00395:01 HOFFMAN
02 when you're acting out in the past, that you
03 never have identified as gay through all of
04 that?
05 A. Correct.
06 Q. Is it always the case you've never
07 identified as -- that you had no identity
08 attached to your homosexual behavior?
09 A. Yeah. Yeah, pretty much. I never
10 thought it was necessary to identify as a
11 sexual orientation.

DEPOSITION VIDEOS

136. PAGE 403:07 TO 403:11 (RUNNING 00:00:10.467)

07 Q. Since you have been married, your
08 slipping up includes or has included viewing
09 gay pornography?
10 A. That's the furthest extent it has
11 gone, yes.

137. PAGE 403:12 TO 403:14 (RUNNING 00:00:05.034)

12 Q. Have you fantasized about men while
13 having sex with your wife?
14 A. Never.

138. PAGE 403:15 TO 404:05 (RUNNING 00:00:31.200)

15 Q. Are you a JONAH counselor?
16 A. How do you define that? Like
17 someone who works under JONAH's building or --
18 Q. Are you someone that Mr. Goldberg
19 refers clients to?
20 A. Yes.
21 Q. Mr. Goldberg or JONAH receives some
22 portion of fees you collect from such a client?
23 A. Correct.
24 Q. What proportion?
25 A. 80/20.
00404:01 HOFFMAN
02 Q. You receive 80, they receive 20?
03 A. Correct.
04 Q. And that goes to JONAH?
05 A. Uh-huh. Yes.

139. PAGE 404:06 TO 404:09 (RUNNING 00:00:15.433)

06 Q. Approximately how many clients have
07 you received from JONAH?
08 A. I would say two to three. I can't
09 recall.

140. PAGE 404:16 TO 404:18 (RUNNING 00:00:07.900)

16 Q. Do you provide JONAH with the
17 payment or do the clients provide payment?
18 A. I provide JONAH with the payment.

141. PAGE 404:19 TO 404:22 (RUNNING 00:00:06.200)

19 Q. Is it possible to live a happy and
20 satisfying life as a gay person?
21 A. I believe, for some men, it can be,
22 sure.

142. PAGE 406:15 TO 408:15 (RUNNING 00:02:00.167)

15 Q. Does Mr. Downing hold golden father
16 energy for you?
17 A. At times. Not strictly.
18 Q. What does -- what does that mean
19 with respect to Mr. Downing and you?
20 A. Alan Downing is a very fatherly and
21 loving figure, and even though I didn't really
22 have a strong craving for that, because I had a
23 very loving father, who I consider to be very
24 golden, when I'm away from my father and like
25 physically, Alan, at times, could sort of give
00407:01 HOFFMAN
02 me some of that energy, and it was very nice.
03 It enabled me to trust Alan very strongly and
04 feel a strong connection to him.

DEPOSITION VIDEOS

05 Q. We talked about some holding time
06 between you and Alan.
07 Are there other ways that he gives
08 you golden father energy?
09 A. Through his support, his care, his
10 speaking to me, his just being there when I
11 need him.
12 Q. Do you have golden father energy for
13 some of your clients?
14 A. I don't think so. I'm kind of
15 young, you know, for it to be like golden
16 father. I think, for my clients, they
17 appreciate more of a brotherly energy that they
18 receive from me, not golden father.
19 Q. You engage in healthy touch with
20 your clients?
21 A. No. At the most, I give them a hug
22 at the end, but never -- there is not a time
23 where I have like engaged in healthy touch with
24 them. I encourage them to do that with their
25 friends.

00408:01 HOFFMAN
02 Q. At JIM, you engage in healthy touch
03 as a -- I forget the right word I want to say.
04 Counselor?
05 A. As a counselor? As a staff member?
06 Q. Staff member. Thank you.
07 A. I mean, some of the processes
08 facilitate that or incorporate that. So for
09 the men that choose me to be that energy for
10 them or to hold space for them in that way, I
11 would be happy to.
12 Q. Do you sometimes choose them?
13 A. No.
14 Q. Never?
15 A. Not as a staff, no.

143. PAGE 408:16 TO 412:07 (RUNNING 00:04:17.933)

16 Q. Do you refer your clients to Journey
17 Into Manhood?
18 A. Yes.
19 Q. And to Journey Beyond?
20 A. If I feel they're ready, yeah, sure.
21 I think you have to be ready for that weekend
22 more than JIM.
23 Q. You were angry at Chaim for -- for
24 being public about his interactions with
25 Mr. Downing, including the nude session?
00409:01 HOFFMAN
02 A. Angry -- more disappointed and sad
03 that -- yeah. Not angry. I always tried to
04 maintain a loving and healthy relationship
05 toward Chaim even after everything.
06 Q. You wanted -- or you asked him,
07 before he did so, to take a different approach?
08 A. Of course, yeah. We actually -- I
09 would be happy to talk about this.
10 We met in person before he was going
11 to do this, before -- after he sent me the
12 letter in one of the e-mails I think I provided
13 to you. And I explained to him very strongly
14 the way I see things, and how he is going to
15 hurt me on the backs of helping others or, you
16 know, and as brothers, as people that we care
17 about each other, that we wouldn't go about
18 doing that.

DEPOSITION VIDEOS

19 And that I hoped -- I wouldn't want
20 to do that to him. And I got him to a point
21 where he agreed he wouldn't want to do that to
22 me. So we tried to formulate a way for me to
23 bring a lot of his issues and pain and hurt
24 to -- to Alan or to JONAH to discuss them, and
25 I waited for him to send me documentation or
00410:01 HOFFMAN
02 his feelings around it, a letter that I could
03 provide, and we agreed on this.
04 This was maybe a month before his
05 first YouTube video, and I waited, and he
06 agreed to it. And he said that he's onboard
07 with that and he loves me and cares about me,
08 too, and wouldn't want to do anything to hurt
09 me. And, unfortunately, he didn't.
10 Q. You didn't want any of this to come
11 to light in terms of the nudity sessions or --
12 A. Not in a way that would malign my
13 work, not in a way that would malign the
14 resources and take away the resources that
15 clearly have helped me and helped me still
16 today and help so many other men that I know.
17 I honored Chaim's pain. I
18 understood that something happened and he felt,
19 at the time, something happened. It was hard
20 for me to understand because he had such a
21 different take on it when I first -- when we
22 spoke about it at the time that it happened,
23 but I was willing to give him the benefit of
24 the doubt and talk and bring forward, and do as
25 best as I can to JONAH and to the right people,
00411:01 HOFFMAN
02 what happened.
03 Q. Prior to Chaim coming public with
04 his experience, are you aware whether JONAH or
05 anyone affiliated with JONAH has made any
06 public statements or any indication publicly
07 that nude therapy occurs through their program?
08 A. Prior to him? Not that I'm aware
09 of.
10 Q. Do you think it would have been a
11 bad idea for that to be public in any way?
12 A. In a way that hurts people, yes.
13 And this is hurting people, because it doesn't
14 make sense. If you are trying to help people,
15 then what about me, what about people that have
16 benefited from this?
17 It seems very hypocritical, quite
18 honestly. There are things that can happen
19 through the course of any psychological pursuit
20 and growth and journey. Sometimes things don't
21 always work out. Sometimes people can
22 experience too much pain or whatever.
23 So my philosophy is that we work
24 through them in a way that helps everyone, that
25 we analyze it, we get to the bottom of it,
00412:01 HOFFMAN
02 we -- and we try to ensure that everyone is
03 still going to get the help and care and love
04 that they need traversing through these very
05 core painful issues and wounds that we bring
06 up. That's my philosophy, and I will stand by
07 it forever.

DEPOSITION VIDEOS

144. PAGE 412:08 TO 413:03 (RUNNING 00:00:55.033)

08 Q. Who, other than Alan, do you know
09 that uses the nudity exercise?
10 A. I don't know an individual counselor
11 that necessarily uses it besides for Alan,
12 because he is the only one that I went to, you
13 know. I don't really talk to counselors about
14 what they do.

15 Q. In your professional training at
16 school, this isn't something that's taught?
17 A. At school? I mean, unfortunately,
18 the schools today and universities and
19 colleagues don't touch this with a ten-foot,
20 stick, you know. It's extremely controversial,
21 and I don't think anyone in school or, you
22 know, main stream schools or colleges are going
23 to learn about how to help people with this.

24 I think that's unfortunate, because
25 then you completely neglect a whole entire
00413:01 HOFFMAN
02 population like myself, but such is the world
03 today.

145. PAGE 414:06 TO 414:09 (RUNNING 00:00:08.400)

06 Q. Have you heard of any other
07 counselors, using the word counselors very
08 broadly, that use the nudity exercise?
09 A. Again, no.

146. PAGE 414:10 TO 414:14 (RUNNING 00:00:11.533)

10 Q. Have you ever been arrested?
11 A. No.
12 Q. Any complaint been made against you
13 by a current or former client?
14 A. No.

147. PAGE 414:15 TO 414:16 (RUNNING 00:00:03.233)

15 Q. No convictions?
16 A. No.

148. PAGE 426:05 TO 426:17 (RUNNING 00:00:41.967)

05 Q. How many of your clients have you
06 led to full transformation in ridding
07 themselves of their homosexuality?
08 A. Zero. I don't think that's --
09 again, kind of related to what I spoke about
10 before, I think that's more of a lifetime
11 journey, that men can choose to partake on and
12 transformation takes a long time, but I have
13 definitely enabled a lot of my clients to
14 experience authentic inner change.

15 Q. What does that mean?
16 A. The change I have described about
17 myself.

149. PAGE 427:22 TO 428:07 (RUNNING 00:00:23.334)

22 Q. Change for you means control, not
23 elimination of same sex attraction?

24 A. Again, we're talking about the
25 difference between change and transformation,
00428:01 HOFFMAN
02 and I think that transformation can take a
03 lifetime, and that's okay, but the success that

DEPOSITION VIDEOS

04 can be achieved via change is definitely one
05 enough to finally meet and satisfy your goals
06 and your dreams and aspirations. So that, to
07 me, is change, and that's success.

150. PAGE 430:11 TO 432:13 (RUNNING 00:02:07.733)

11 Q. Does this look familiar?

12 A. Yes.

13 Q. What is it?

14 A. I know what this is. This is the
15 Guard Your Eyes handbook for men who are
16 struggling with addiction. And for a lot of
17 men, this helps them. I don't use it at all in
18 my work. I have never really read through it,
19 honestly.

20 Q. This is their main guide for the
21 work of this organization, Guard Your Eyes?

22 A. This helps men not strictly with
23 same sex attraction, but with addictive
24 behaviors. So a lot of their resources are
25 going to be really geared toward that very

00431:01 HOFFMAN

02 specific sort to addictive behavioral acting
03 out, and I don't really -- I think it's
04 important to confront those issues, but it's
05 not my expertise, and on their web page and in
06 my association with them, I'm more away from
07 the addict -- helping people with addict --
08 addiction, and I make this very clear with the
09 clients that come to me, but more there for
10 helping men with the deeper emotional wounding
11 around same sex attractions.

12 So this stuff is all very
13 interesting, but it's not necessarily something
14 that I use in my work and is really related to
15 me.

16 Q. Homosexuality isn't an addiction,
17 like alcoholism or something like that?

18 A. I mean, it certainly could become
19 that for some people, you know, addictive
20 acting out. I think it did for me, but as a
21 thing on its own, it's definitely not an
22 addiction, in my judgment.

23 Q. You don't help people with gay
24 sexual addictions?

00432:01 A. I mean, if they -- if I feel that
HOFFMAN

02 men have what I just described as homosexual
03 addictions becoming addictive -- a homosexual
04 attraction becoming addictive and it's
05 bothering them and that's something they need
06 to work on, I think even gay men can sometimes
07 feel that way about their compulsive sexual
08 behavior, then I would be happy to help them.
09 I usually actually send them to work with
10 people who are professional in that field, like
11 anonymous groups or men who -- people who are
12 more expertise with that addictive behavioral
13 quality.

151. PAGE 439:19 TO 440:21 (RUNNING 00:01:25.233)

19 Q. Mr. Hoffmann, how would you describe
20 your relationship with your wife?

21 A. Really awesome. I have a really
22 open relationship with my wife, one that is
23 just very loving and caring and real. I miss

DEPOSITION VIDEOS

24 her being away from her.
25 It's just really awesome. It's
00440:01 HOFFMAN
02 really fulfilling. She supports me with this
03 journey. She supports with me what I'm doing
04 today. I feel that I have passion about her,
05 very, very good things.
06 It's a blessing, really to have the
07 wife that I have. It's a blessing to have the
08 child that I have, my daughter, Rayna, and I
09 even consider the child that we just had,
10 Meira, as the child that we feel very blessed
11 to have. Unfortunately, we lost her really
12 early.
13 And the family that I've been able
14 to make with my wife has been one that has
15 really fulfilled the dream that I had of
16 eventually having a family. And I'm very
17 emotionally satisfied. I'm satisfied on really
18 all levels, and --
19 Q. Are you satisfied sexually in the
20 relationship?
21 A. A hundred percent.

152. PAGE 441:20 TO 441:21 (RUNNING 00:00:02.700)

20 MR. LIMANDRI: Thank you. No
21 further questions.

153. PAGE 442:02 TO 443:05 (RUNNING 00:01:08.334)

02 Q. Despite your loving wife and child,
03 your journey to overcome your same sex
04 attraction is one that is still ongoing and you
05 expect to struggle with same sex attraction for
06 the rest of your life?
07 A. The way I look at it is that it's
08 all part of a comprehensive journey. I don't
09 expect to struggle at all the way that I used
10 to, and that's clear in the way I struggle
11 today.
12 The struggles are much more
13 minimally -- minimal than they were before, and
14 I'm a lot more in control with -- I have a lot
15 more control over the attractions.
16 I'm not going to expect complete
17 perfection in this, because the wounding is
18 very deep, and it lasted many years. And I
19 have only been in this, proportionately, a much
20 less amount of time versus the years that I had
21 all the wounding.
22 So I'm patient with it, but I know
23 it works. I know it creates change. I know it
24 creates a healthy relationship with men and
25 with my wife, and I consider that successful.
00443:01 HOFFMAN
02 If it's more black and white to you,
03 then you probably wouldn't, but I don't think
04 that's a healthy way to look at things
05 altogether, but yeah, that's how I see it.

TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 03:34:08.182)