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Attorneys for Defendants

Michael Ferguson, Benjamin Unger, Sheldon
Bruck, Chaim Levin, Jo Bruck, Bella Levin,

Plaintiffs,

v.

JONAH (Jews Offering New Alternatives for
Healing f/k/a Jews Offering New Alternatives
to Homosexuality), Arthur Goldberg, Alan
Downing, Alan Downing Life Coaching,
LLC,

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW
DIVISION - HUDSON COUNTY
DOCKET NO. L-5473-12

Civil Action

**CERTIFICATION OF ARTHUR
GOLDBERG, IN OPPOSITION TO THE
PLAINTIFFS MOTION TO ENFORCE
PERMENANT INJUNCTION AND
DEFAULT JUDGMENT**

I Arthur Goldberg certify as follows.

1. I make this certification in opposition to Plaintiffs motion to enforce a permanent injunction and default judgment.
2. I am fully familiar with the facts set forth herein.
3. When the letter from Counsel for the plaintiffs was received I responded honestly and forthrightly. Many of the people JONAH referred to counsellors were not seeking treatment for same sex attraction and in fact many were not even gay. However, I did not know for certain what the clients were being treated for and only assumed that at least some of them were being treated for same sex attraction. I stated that because I did not want to be accused of trying to

hide anything and I did not think it was an issue because the referrals predated the settlement and both the patients and the counsellors were out of state.

4. Further, I thought that if the plaintiff's asked for more information or served me with a notice of breach I would then contact the counsellors, find out if any of the patients were receiving treatment to change their sexual orientation.

5. If at that time I did confirm that any of them were receiving treatment to change their sexual orientation and the plaintiffs argued that was a breach of the agreement I would have refunded the fees JIFGA had received for those clients. I would have done this simply because that would have been less costly in the long run than fighting about whether or not it was a breach of the settlement agreement.

6. Upon being advised that the plaintiffs had filed a motion alleging the breach I contacted the counsellors and was informed that none of the clients were receiving treatment to change their sexual orientation.

7. It should be noted that I have made no referrals to counsellors for any reason since the settlement agreement was signed.

8. Upon the conclusion of the trial in this matter and realizing that JONAH would in all likelihood not survive Elaine Berk and I decided to take on a different project. We decided to form a not for profit called the Jewish Institute for Global Awareness. The purpose of that organization is set forth in our mission statement;

The Jewish Institute for Global Awareness seeks to globally provide humanity with greater awareness of the existence of these universal values, principles that are dependent upon Biblical teachings. These are root ethical values that Jews, Christians and Muslims, who represent more than 50% of the world's population, can act upon within their own religious traditions. The great Eastern religions,

Hinduism and Buddhism, also have, at their root, a primordial link to these core values. In fact, going back to Noah, these values are part of a legacy for all humanity to follow.

The Jewish Institute for Global Awareness (JIFGA) teaches that by understanding, internalizing and following a set of Divinely-ordained moral imperatives and universal ethics known as the Seven Noahide Laws, the world can produce more just societies, which are better able to receive and retain G-d's** Presence. We seek to inspire our fellow human beings, because we are all descendants of Noah who, together with his family, is described in the Hebrew Bible as the survivor of The Flood and who thus became the ancestor of all of humanity. However, not only do we seek to inspire everyone who follows the Abrahamic religions (Jews, Christians, and Muslims) to follow these Noahide laws but also those of every race, color, or creed.

Our foundation is rooted in Biblical principles and expresses a Biblical worldview. Some may refer to this code as representative of a "Judeo-Christian" worldview because it includes the moral values initially set forth in the Hebrew Bible (the Torah) and shared by the Christian traditions that historically shaped much of the western world. Given to us by G-d at the dawn of history, (as recounted in the book of Genesis and documented in the Talmud, Sanhedrin 56a-b -- the Oral Law), these seven principles, if followed, permit us to establish a harmonious world in which diverse peoples can live together peacefully.

9. While I will not deny that we have addressed the issue of homosexuality our focus is much broader than that and the few times we have addressed that issue it has not been to promote commerce in conversion therapy but to advocate in the public square for a particular viewpoint with regard to the issue.

10. In furtherance of the purpose of JFGA I have written the following articles that have been published:

The Secularization of America's Religious Colleges and Universities

We Must Reclaim Parental Rights as Building Blocks to a Healthy Society Restored"

Abortion Stops A Beating Heart: The Heartbeat Protection Act of 2017 –

The Inalienable Right to Life: An Update on Assisted Suicide in the United States and Canada -

The Urgency of Restoring the Biblical Values of America's Founders,

Same-Sex Attraction and Therapy: It's Time to Let People Choose

Restoring the Political Moral Center, co-authored with Rabbi Dr. Shimon Cowen,

The Contagion of Euthanasia and the Corruption of Compassion, co-authored with Rabbi Dr.

Shimon Cowen

Faith-based grassroots project addresses serious, hidden crisis of sexual exploitation of children

in Kenya co-authored with Andrew Symes

The Fight Against Sex Trafficking

This articles have been published and reprinted on websites such as Public Discourse,

www.lifenews.com, www.lifeissues.net, www.virtueonline.org, the University Faculty for Life

Website, Barbwire.com, AnglicanMainstream.com, www.churchmilitant.com and CNS News.

11. Elaine Berk and I met with Rabbi Yakov D. Cohen, Director of the Institute of the Noahide Code, a UN based NGO with consultative status to the United Nations whose focus is to create peaceful cooperation among people and nations. Rabbi Cohen, had both Elaine Berk and Arthur Goldberg appear on his television show to explain our particular focus on educating the public about the Noahide principles and their applicability to today's social and cultural issues.

12. A second group with whom JIFGA connected is Ask Noah.Org led by Rabbi Dr. Michael Schulman. Impressed by JIFGA's research on various topics, including in particular how various world leaders have recognized the importance of the Noahide laws as a moral code for all

nations, Dr. Schulman asked permission to reprint some of Mr. Goldberg's research on their website.

13. JIFGA is also working with an organization out of Texas called Netiv which does a great deal of educational video programming and will start doing projects with JIFGA when, in the near future, Rabbi Dror Moshe Cassouto joins JIFGA as its director of Religious Education.

14. I have been asked to speak at the Noahide Academy Conference in Jerusalem in June, the Director has also asked me to tape some lectures for their on line classes.

15. All of these activities are promoted through JIFGA.

16. JIFGA has also created a website called Funding Morality. This website was started as a result of the denial by other "crowd funding" platforms to profile persons of faith who would not compromise their moral and biblical convictions and in turn have been persecuted by those who are intolerant of a Judeo-Christian worldview. These crowd-funding platforms (which are mostly for-profit businesses) have often denied services to individuals who have lost their jobs, been harassed or persecuted for their politically incorrect views

<https://fundingmorality.com/page.php?id=who-we-are>

17. Some of the projects that have sought to raise money on our platform include as raising money for Jonathan Wedger a crusader against child sexploitation, scholarships for pro-life medical students, funding for a Political Network for Values- Youth Program, money for the medical bills of Stephanie Packer, wife and mother of four and a former church youth counselor who was diagnosed with scleroderma in 2012, funding for a Kenyan youth center The Life Choices program, started by the Anglican Church and funding for Julio Severo Blogger and one of the founders of the National Pro-Life and Pro-Family Network in Brazil.

18. This is just a small sampling of the projects that have sought funding which have nothing to do with “conversion therapy”. None of the projects on funding morality have been started by me, Elaine Berk or JIFGA. They are all put on the site by independent third parties or organizations.

19. I hope it is now clear to the Court that JIFGA is not the Alter ego of JONAH and it has a completely different mission and focus then JONAH had.

I certify that the within statements are true. I know that if any of the within statements are willfully false I am subject to punishment.

Date:

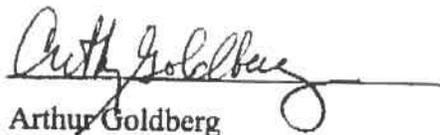
Arthur Goldberg

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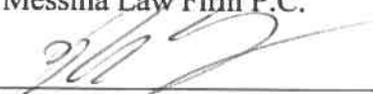
Date: 4/27/2018


Arthur Goldberg

CERTIFICATION AS TO FACSIMILE SIGNATURE
PURSUANT TO RULE 1:4-4(C)

I certify that the signature of the certifier is a facsimile of the certifier's original signature and the certifier acknowledged the genuineness of the signature. The original document, or a copy with an original signature affixed, will be filed if requested by the court or a party.

Dated; 4-27-18

Messina Law Firm P.C.
by: 
Michael P. Laffey