

Michael P. Laffey, Esq. NJ Bar No. 026761986
Messina Law Firm, P.C.
961 Holmdel Road
Holmdel, NJ 07733-2103
Tel: (732) 332-9300; Fax: (732) 332-9301

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 ROBERT MORGAN,
IN OPPOSITION TO THE PLAINTIFFS
MOTION TO ENFORCE PERMENANT
INJUNCTION AND DEFAULT
JUDGMENT**

I Robert Morgan, Licensed Clinical Social Worker (LCSW) certify as follows.

1. I make this certification on behalf of Arthur Goldberg and Elaine Berk's opposition to a motion to enforce a permanent injunction and default judgment against him.
2. I am fully familiar with the facts set forth herein.
3. I am Licensed Clinical Social Worker (LCSW).
4. The following clients of mine, listed in paragraph 6 of this certification (without names for reasons of client confidentiality) and ordered numerically were all referred to me by M r. Goldberg prior to June 1, 2015. Their therapy continued into 2016. He referred no new clients to

me after June 1, 2015. Pursuant to an agreement with Mr. Goldberg I paid referral fees to JONAH.

4. JONAH had assigned the rights to those referral fees to an organization called the Jewish Institute for Global Awareness (JIFGA).

5. None of the clients that are listed below were being treated for same sex attraction or receiving conversion therapy. I do not practice conversion therapy.

6. The list of clients for which JIFGA received referral fees is as follows:

Client #1 - Presenting problems: Unresolved childhood trauma witnessing his father hanging by the neck (suicide), anxiety about a lawsuit pending against him, sex addiction, marital problems. Treated for F4 3.22 Adjustment Disorder with Anxiety and Z63 .0 Relationship Distress with spouse

Therapy Used: Cognitive Behavioral Therapy (CBT), Eye Movement Desensitization and Reprocessing Therapy (EMDR/trauma work), Gestalt Therapy, Marital Therapy focused on conflict resolution, encouraged involvement with Sexaholics Anonymous 12 Step Program.

Client #2 - Presenting problems: Unresolved abandonment trauma concerning father leaving the family when the client was a boy, lack of self-esteem coupled with depression, difficulty forming friendships coupled with anxiety, financial issues.

Treated for: F43.23 Adjustment Disorder with mixed anxiety and depressed mood Therapy Used: CBT, EMDR/trauma work, accessing emotions/grief work.

Client #3 - Presenting problems: Depression, feelings of hopelessness, unresolved anger at mother, difficulty forming and sustaining relationships with women.

Treated for: F43.21 Adjustment Disorder with depressed mood

Therapy Used: CBT focused on developing boundaries and accessing personal agency, Assertiveness training .

Client #4 - Presenting problems: unresolved trauma from sexual abuse as a boy, poor self-esteem, sex addiction, marital problems.

Treated for: F4 3.23 Adjustment Disorder with mixed anxiety and depressed mood and Z63.0 Relationship Distress with spouse

Therapy Used: EMDR/trauma work, Gestalt Therapy, CBT, Assertiveness training , accessing emotions/grief work, encouraged involvement with Sexaholics Anonymous 12 step program .

Client #5 - Presenting problems: Performance Anxiety over entering Medical School, poor self-esteem, difficulty establishing friendships , nervousness, difficulty urinating in public bathrooms.

Treated for: F43.22 Adjustment Disorder with anxiety

Therapy Used: CBT focused on work around cognitive distortions, Assertiveness Training, developing boundaries and accessing personal agency.

Client #6 - Presenting problems: Anxiety about dating a woman he liked, anxiety about adversarial relationship with a cousin caused by a personal disagreement, worry about the viability of the business he ran.

Treated for:F43.22 Adjustment Disorder with anxiety and Z63.0 Relationship Distress with his girlfriend

Therapy Used: CBT focused on the distinction between facts, made up stories, emotions and wants, Assertiveness training, Gestalt Therapy

Client#7 - Presenting problems: Middle-aged man still living with parents, poor self-esteem, sex addiction, socially withdrawn, depression, anxious over conflict with parents.

Treated for: F43.23 Adjustment Disorder with mixed anxiety and depressed mood

Therapy Used: CBT focused on developing boundaries and accessing personal agency, Assertiveness training, encouraged Involvement in Sexaholics Anonymous 12 step program

Client #8 Presenting problems: Anxiety about self-perception of not measuring up to others' Intelligence, lacks self-confidence, takes on other peoples' problems, poor personal boundaries.

Treated for: F43.22 Adjustment Disorder with Anxiety

Therapy Used CBT focused on developing self-confidence and personal boundaries, Assertiveness training.

Client #9 - Presenting problems: Unresolved trauma with feelings of rejection by family members growing up, body shame issues, poor self-esteem, ADHD not medicated, anxiety over lack of money and lack of self-confidence.

Treated for: F43.22 Adjustment Disorder with anxiety

Therapy Used: EMDR/trauma work, CBT focused on developing self-confidence, Assertiveness training, encouraged weight loss program, explored job opportunities, recommended medication for ADHD

7. 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.

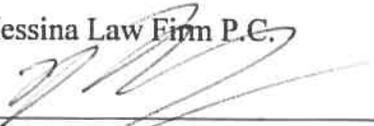
Date *4-27-2018*

Robert Morgan, LCSW
Robert Morgan, LCSW

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