

EXHIBIT 30

1 SUPERIOR COURT OF NEW JERSEY

2 HUDSON COUNTY, LAW DIVISION

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3 MICHAEL FERGUSON, BENJAMIN UNGER, SHELDON
4 BRUCK, CHAIM LEVIN, JO BRUCK, BELLA LEVIN,

5 Plaintiffs,

6 -against-

7 JONAH (Jews Offering New Alternatives for
8 Healing f/k/a Jews Offering New Alternatives to
9 Homosexuality), ARTHUR GOLDBERG, ALAN DOWNING,
10 ALAN DOWNING LIFE COACHING LLC,

11 Defendants.

12 Docket No. L-5473-12

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13 One Liberty Plaza
14 New York, New York

15 February 19, 2014
16 9:37 a.m.

17 CONTINUED DEPOSITION of ARTHUR GOLDBERG,
18 taken pursuant to Notice, held at the offices
19 of Cleary Gottlieb Steen & Hamilton, LLP, taken
20 by Fran Insley, a Notary Public of the States
21 of New York and New Jersey.

22
23 ELLEN GRAUER COURT REPORTING CO. LLC
24 126 East 56th Street, Fifth Floor
25 New York, New York 10022
212-750-6434
Ref: 106349

1 GOLDBERG

2 understood he had OCD. What is the connection
3 between your belief that Benji was diagnosed
4 with OCD and my question about what he should
5 have done in order to become heterosexual?

6 A. The connection is that sometimes if
7 you have other co-morbid issues, other
8 psychological issues that get in the way of you
9 dealing with the underlying issues -- again,
10 homosexuality, in our view, deals with
11 underlying issues, lack of self-esteem, lack of
12 self-worth, that kind of thing which we talked
13 about. Sometimes you can't even get to those
14 issues because the other issues are getting in
15 the way. So you have to handle those issues
16 before you can even actually attack the
17 underlying issues dealing with the SSA.

18 Q. Is your answer that Benji could
19 never have become heterosexual because he had
20 OCD?

21 A. I didn't say that.

22 Q. Then what is it specifically that he
23 should have done?

24 A. It would hinder -- it would hinder
25 his progress. It would take longer.

1 GOLDBERG

2 Q. Could it be thousands?

3 A. It could be.

4 Q. Do you hear a lot of the same
5 questions over and over again?

6 A. Yes.

7 Q. What are the most common questions
8 that you hear?

9 A. What are the causes of
10 homosexuality? Is change possible? Are people
11 born gay? Those would be very common
12 questions.

13 Q. Are there any other extremely common
14 questions that you typically hear in these
15 initial phone calls?

16 A. Not at the moment that comes to me.

17 Q. How do you typically respond when
18 people ask you what are the causes of
19 homosexuality?

20 A. I basically go through the list of
21 causes, such as defensive attachment from the
22 father figure in connection with the mother
23 figure, same sex peer wounds, body image
24 wounds, sexual abuse can play an important
25 role. Those kind of things.

1 GOLDBERG

2 their same sex attractions?

3 A. No, not that I can recall.

4 Q. Do you know whether JONAH counselors
5 ever recommend that clients take natural
6 supplements as part of their treatment?

7 A. I have no idea.

8 Q. Do you have a view as to the
9 efficacy of natural supplements in treating
10 same sex attractions?

11 A. I personally can't see how that
12 would help since I believe that homosexuality
13 is a symptom of underlying emotional issues, so
14 I don't see how the supplements would
15 necessarily help, although I'm not -- come to
16 think of it, if someone says it helps them, who
17 am I to deny it?

18 Q. Do you ever recommend that people
19 take medications as part of their treatment?

20 A. No. As a matter of fact, I tend to
21 be an anti-medicine type person myself, but if
22 a doctor says that someone needs it, that is up
23 to them and the doctor.

24 Q. Why are you anti medicine?

25 A. Because I think medicine can often