

EXHIBIT 43

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SUPERIOR COURT OF NEW JERSEY
HUDSON COUNTY, LAW DIVISION
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MICHAEL FERGUSON, BENJAMIN UNGER, SHELDON
BRUCK, CHAIM LEVIN, JO BRUCK, BELLA LEVIN,

Plaintiffs,

- against -

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.

DOCKET NO.: L-5473-13
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401 West A Street
San Diego, California

March 25, 2014
9:21 a.m.

Videotaped Trial Testimony of SEAN PATRICK
HENNIGAN, taken pursuant to Agreement, before Rosalie
Kramm, California CSR No. 5469, RPR, CRR.

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HENNIGAN

that way today, is that I want to wait until I'm married, but I do feel a strong attraction now sexually.

Q. Tell us about your childhood and your relationship with your parents. What was that like?

A. I knew my parents both loved me. I realized that. But -- and I think they would have done anything for me. But my father was an alcoholic. And it kind of affected my communication with him. I always felt like he wasn't really listening to me. He was not an abusive drunk, like that. He was just disconnected.

And my mom didn't approve of it at all. So it made her very unhappy. And so she -- she would criticize -- I would be like her confidant, and she would criticize my dad a lot.

So seeing that my mom would be hurt by that, I felt pulled -- torn. So I felt drawn to her and separated from my dad. And also, I think at the same time, any sort of masculinity he showed, I just thought, you know, is that what I want? I don't want to be crude. I don't want to be this. I don't want to be that. So there was a separation there.

And then -- oh, I don't know. You want to get into siblings?

Q. Sure.

HENNIGAN

1 attraction, your brothers and your parents?

2 A. Did they know that I did?

3 Q. Yes.

4 A. No, not that I was aware of, although I think
5 later on, many years later they -- they made reference to
6 it then. My parents I don't think ever did. No, I'm
7 positive they never did, but my older brother, yeah, kind
8 of hinted at that.

9 Q. Did they later find out as you got older?

10 A. I never admitted to it. Although I did have --
11 I did have a magazine one time that my brother found, so
12 I think he figured it out from that. It was a gay
13 magazine.

14 Q. Were you ever in any long-term relationships
15 with -- with, I guess, any men?

16 A. Not really, except I did have this really good
17 friend. By then I was already -- you know, I didn't --
18 that was part of the issue. It was like I had all these
19 men I would meet, but I had no male friends. So I met
20 this guy, and I think he wanted sex, and I didn't. I
21 just -- I wanted desperately to have a friend.

22 Q. How old were you at the time?

23 A. I was 50 -- early 50s. Yeah. I think so.

24 Q. Okay.

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HENNIGAN

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2 A. No.

3 Q. So at some point you decided to start with
4 therapy, and then you eventually attended a JiM weekend.
5 And I want to get a sense of when you first decided to
6 address your SSA through therapy. When was that and tell
7 us about that.

8 A. Okay. That was in March 2008. Basically just
9 around that period of time I -- I talked to my pastor
10 about it, and I had a sense that -- I knew morally what I
11 needed to do. And I went to a church that was really,
12 really -- I would say by the book, you know? So it was
13 really neat that I talked to him and he understood, and,
14 you know, wanted to help me.

15 But I -- I thought rather than deal with the
16 temptations in a moral respect, just on their own, I
17 needed to do something psychological. I wanted to figure
18 out why do I have the attractions to start with. So that
19 started to appeal to me.

20 And I started searching the internet, and --
21 and suddenly I came across NARTH, and I thought, this is
22 cool. I'm reading this stuff, it made sense to me as far
23 as the causes and everything else.

24 So through them I made contact with Floyd
25 Godfrey, and he became my therapist. So I started with

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that men hang out, to be together with men. So I had belonged to gyms in the past, but at that time I was working out at home, which I also found very isolating, too. I had my porn over here and my gym here. And so once again, I was by myself.

So -- so what I did is I joined the gym again, only this time, of course, I didn't go there to cruise. So I went there to relate to the men around me. In the past I would go to a gym and I would just kind of nod, you know, that would be it. I made an extra point of talking to them. I'd say -- I'd ask them about their workouts and, like most buff guys, they love talking about that. So they were relating to me and it started to make me feel like I was a man like them.

And, plus, as I was working out, I was building up myself and they were comment -- complimenting me on that. And it was just beautiful, just the back and forth. And I made a concerted effort every time I went to the gym to talk to someone, every single time. And --

Q. So that was one area you guys addressed, the sexualized envy. But what other areas did Mr. Godfrey work with you on?

A. Let me think. Well, I think it was just generally in terms of self-esteem, start doing things

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HENNIGAN

that -- kind of like a face your fears kind of thing, which kind of became my mantra, that if it's something you're afraid of, you probably need to just go ahead and do it.

And kind of in relation to what we just talked about is, one of the things -- oh, more specifically is, there were also men that -- that represented my brother to me. I mean that same energy. They were taller, which kind of fit, they were older, bigger, he was bigger. So I made a special effort to talk to those men, too. And that kind of helped me with my brother, brother things, because, well, this guy is treating me well, and you know, he's just like my brother. So that kind of helped.

And then the other one was, is, like, there would be two men, and being that my brothers always hung together against me, it was really difficult for me to walk up to, like, two or three men at one time. I could deal with one, but, you know, I was thinking they were all making judgments about me. So that's another thing I had to do. So -- and that helped.

And there was -- oh, and so, also, that -- that -- that was kind of more physically. I don't think I established any really deep friendships there, but it was still valuable to me because I was being accepted.

1 HENNIGAN

2 And that was part of the issue, too, in that --
3 and then when he died, I -- that's when I realized I had
4 no friends. So I was still trying -- my idea was is
5 that, oh, a gay person would at least understand me,
6 what's going on, and -- but I wanted to make friends. It
7 was extremely important for me to make friends with them
8 and not be sexual. But almost every case that man that I
9 thought could just be my friend turned it sexual.

10 Q. Have you ever had female friends?

11 A. Sure. Yes.

12 Q. Throughout your life?

13 A. Yes. People I worked with.

14 Q. Close friends?

15 A. Not real close, just --

16 Q. Would you see them outside of work?

17 A. Sometimes, occasionally we would do a work
18 party type thing or work get-together or something.

19 Q. What about when you were in school?

20 A. No, I didn't go to many parties.

21 Q. Did you have friends?

22 A. Not many.

23 Q. How many?

24 A. In grade -- oh, in high school, probably only
25 two.

HENNIGAN

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2 Q. Is there anything else that stands out in your
3 mind about any of the experiential weekends you attended
4 as particularly meaningful, significant, or helpful to
5 you?

6 A. No. I think I pretty much covered it.

7 Q. In your therapy with Mr. Godfrey, did you
8 discuss what homosexuality is and what causes it?

9 A. Yes.

10 Q. Is that also something you discussed at Jim?

11 A. I don't think it was discussed at Jim. I think
12 it was more that you -- well, I think it's more of a
13 self-discovery thing. You -- you examine what you think,
14 you know, as far as masculine -- remember I mentioned
15 earlier about the masculine wounds. So you're encouraged
16 to -- you know, to look inward and see what -- what --
17 what wounds you have around that. So --

18 Q. What did Mr. Godfrey tell you about what
19 homosexuality is and what causes it?

20 A. Well, he -- he -- well, the first thing was it
21 could be different for everyone. It could be a
22 combination of things. So we -- just by talking, we just
23 were able to narrow things down, like the envy, the low
24 self-esteem from my brother, all these different things.

25 Q. So in your case, feeling jealous of other men

1 HENNIGAN

2 and --

3 A. I prefer envious, because envious of their
4 attributes, as opposed to being jealous of the attention
5 they were getting. Although I think there was probably
6 jealousy involved, too. That -- that is true as far
7 as -- in fact, I -- I still feel that. It's not
8 sexualized anymore, but I do feel that if someone is
9 getting a lot more attention, that I would like to get
10 some. Yes, I do feel those things. Yeah. That is part
11 of it.

12 Q. So the envy and/or jealousy --

13 A. Yeah.

14 Q. -- that you experienced towards other men was a
15 factor in your homosexual desire?

16 A. Yeah, as -- and as far as the way I addressed
17 it was sexual.

18 Q. And the insecurity that you felt contributed to
19 your experience of homosexual desire?

20 A. Right, and that -- there was in my mind that I
21 felt like if I was intimate with that person I would be
22 like them, or I would be -- I would have some of what
23 they have. And of course, it's not true. I was the same
24 person after the sexual thing happened, so --

25 Q. What else contributed, in your understanding

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HENNIGAN

from your counseling with Mr. Godfrey? What else contributed to your experience of SSA?

A. Well, I think that covers it. My self-esteem, my brother, my disconnection with masculinity. I rejected my father, or not respecting him, not wanting to be like him. And, of course, my mother setting it up that way. She was a very loving person, very protective. All those things I -- would all be causes for me. For me. It varies.

Q. So to follow up on that, you said that it varies for different people. Did you and Mr. Godfrey discuss what other causes might be for other people who weren't you?

A. I don't think we necessarily did, but we -- we just acknowledged the fact that it's going to be different for everyone and we need to explore whatever that was, to see what it was for me. Like there -- I -- well, just -- just from what people have said, some people say that it was just to do with the mother or, you know, she was just so smothering that it wasn't necessarily that dad was a problem. There's all variations. Yeah, he would discuss that. But it was more of a self-discovery thing, once again. He was not -- he did not lead it in that respect.

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HENNIGAN

He just -- you know, we just by talking it through, what -- what do you think? What -- you know, what are your experiences? Why did you feel that way?

So he was -- I often say that I don't think he did much talking. I did most of it. So he was just there to facilitate my own exploration into why.

Q. And is it your understanding that once these issues are resolved, the SSA will go away?

A. Yes. It did for me, because once I -- like, okay. Since the problem was the self-esteem, my self-esteem rose, I identify with masculinity just by what happened in the past, and you know, I kind of identify it more solidly; and it's kind of like I said, it's assertiveness, and when you are in a sense of assertiveness, SSA doesn't appear, so --

Q. Is that in your case or in all cases?

A. I have heard it on other cases, too, but I -- it's particularly true of me. I've heard it -- I've heard it is a common experience with other people. But it varies.

And everyone has little bits and pieces. I used to refer to it as like strands of a cable, you know, all mixed together. Well, everybody is going to be a little bit different. We're not all the same. A