

# **EXHIBIT 45**

1 SUPERIOR COURT OF NEW JERSEY  
2 HUDSON COUNTY, LAW DIVISION

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4 MICHAEL FERGUSON, BENJAMIN UNGER, )  
5 SHELDON BRUCK, CHAIM LEVIN, )  
6 JO BRUCK, BELLA LEVIN, )

COPY

7 Plaintiffs, )

8 v. ) Case No. L-5473-12

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

15 Defendants. )

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19 VIDEOTAPED DEPOSITION OF PRESTON R. DAHLGREN

20 Salt Lake City, Utah

21 Monday, March 10, 2014

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28 Reported by: Daren S. Bloxham, RPR No. 000335

29 LST Job#204461

1 phrases we use there.

2           You watch men experience for them these types of  
3 processes that are set up, and yet they're not because  
4 they're made unique and individual to each person. They're  
5 tailored to what they need.

6           And for me as I stood there on the guts carpet  
7 that second time, it was that next day, I remember thinking,  
8 well, this is what I need, this is what I need, this is what  
9 I need, this is what you have to do.

10           And the facilitator asked some really pointed  
11 questions about my personal life and about my experiences.

12 ~~And I had forgotten about a lot of it. And I was starting~~  
13 to recall all these memories and different things.

14           And there was one particular moment that was  
15 brought back to my imagination -- not to my imagination, but  
16 brought back to my mind. And all this while, I kind of  
17 thought that I had forgotten about some of that stuff, but I  
18 hadn't. And all of a sudden all these issues, issues with  
19 my brothers came up, issues with my dad, issues with friends  
20 in high school and middle school.

21           And there was one in particular that just really  
22 stood out, a moment with my dad that was right at the  
23 forefront of my mind. And I'll never forget what happened.  
24 The guy who was facilitating the process was asking these  
25 questions and said, Do you remember what the scenario was?

1 I do. I was four years old. I was playing "I'll show you  
2 mine if you show me yours" with a neighborhood girl. I was  
3 curious about her anatomy and about her.

4 In the process, he said, Can you tell us more  
5 about that? Do you feel safe to go forward? I said, Yeah,  
6 of course I do. I came here to do hard stuff. I want to  
7 work on my issues, and I want to learn what this is about.

8 And so I started telling the facilitator just  
9 exactly what happened. I remember being four years old. We  
10 were on the side of this house, and one of the neighborhood  
11 girls -- I was four and maybe she was three or I was five  
12 and she was four. I think she was just a year younger than  
13 me is what I recall. We were kind of same age peers or  
14 whatever.

15 And she kept wanting to show me her -- her private  
16 parts. And she had OshKosh B'gosh overalls on. Those damn  
17 things, I couldn't get the overall off, and she couldn't get  
18 it off. And so I just said, Well, I'll show you mine  
19 instead.

20 So I did that and did it a few times, just showed  
21 her my private parts, pulled my pants down, showed her,  
22 pulled them back up. And she -- she was -- you know, I  
23 don't remember her reactions as much as she was curious like  
24 kids are. You know, what did they say, 50 percent of  
25 America plays these types of games growing up.

1           But that wasn't a big deal. That wasn't a  
2 problem. And I was naturally curious about her, just like I  
3 was curious about gender in general, you know. I think most  
4 kids are. It's normal. It's kind of a phase thing.

5           But I remember her mom came around the corner.  
6 And when her mom came around the corner, I knew we were  
7 caught. And that's something -- something went wrong in  
8 that moment, the way she reacted. She was quiet and somber  
9 and at the same time mad, really mad at what had happened.

10           And I remember she called my parents, and I went  
11 home later that day. And I knew when my dad got home, I  
12 was going to get in trouble. And sure enough, my dad comes  
13 home. And I knew my mom had talked to him, but I was a boy.  
14 I don't recall all the details other than I remember him  
15 calling me into his room, and I was at the side of his bed.

16           And he just began to yell at me and talked about  
17 how inappropriate it is to do this with girls and how  
18 inappropriate it is to want to see that stuff. You know,  
19 this is my perception as a four-year-old, now as a  
20 32-year-old or five-year-old and a 32-year-old recalling  
21 that. I think I was 26 or so when I went on the weekend.

22           But I remember being yelled at. And as I tried to  
23 explain myself to my dad, I couldn't. I didn't have the  
24 words to express what I was doing and why. And I just -- I  
25 remember getting the message that this is bad and this is

1 wrong, and girls are better than us, and we're not supposed  
2 to look at them that way.

3           And something changed. I do know that that was a  
4 profound moment for me in how I viewed women and how I  
5 interacted with my dad. And there was a -- an element of  
6 trust that was broken there.

7           Anyway, so going back then on to this weekend, I  
8 recanted some of that story. And the facilitator then said,  
9 Would you like to express that anger? I said, Yeah. I'm  
10 mad. Something changed in me, and I'm mad that I did that.  
11 And I -- I wanted to yell back at my dad, but I couldn't,  
12 and he kept interrupting me.

13           And so they set up what's called psychodrama, like  
14 a guts carpet is what we call it, and then I pick somebody  
15 to represent my dad and I pick somebody to represent my mom,  
16 who was in the kitchen at the time not listening or not  
17 helping out when she could clearly hear my dad yelling at  
18 me. And then we played this scene out.

19           And I just remember getting so mad. And it was so  
20 freeing. It felt so good because I could finally express  
21 what I had cooped up and hidden inside of me for years. And  
22 it felt very freeing. And something in that moment again  
23 changed deep inside. I don't know how to describe it other  
24 than there was an empowerment to me that has never been the  
25 same since. And that weekend helped me bring that to life

1 emotionally close with. And what surprised me even more was  
2 how much more he cried.

3 Q. What did you take from that experience?

4 A. That he's a human being; that he has feelings just  
5 like I do; and that his feelings matter to him just as much  
6 as mine matter to me; and that he had experiences as a child  
7 that I didn't know about that helped me understand him and  
8 how he related to me better.

9 Q. It was a healing experience?

10 A. Yes.

11 Q. Did it have anything to do with diminishing SSA?

12 A. No. I mean, I think that's the byproduct, yeah.

13 But in that moment, I wasn't thinking about attractive guys  
14 or SSA or anything like that. But I learned this process on  
15 my JIM weekend.

16 I learned how to ask for what I want, how to state  
17 my need, and how to stand up and assert myself for me  
18 instead of for other people. Doesn't mean I wasn't scared  
19 to ask. I was petrified. I could hardly talk to him about  
20 it.

21 But it gave me the idea as to what I want and how  
22 to go about making that happen. Do I feel less same-sex  
23 attraction as a result of it? I think so. I don't know for  
24 sure. I think that answer is a culmination of things.

25 Q. You mentioned before that during that weekend,

1 Q. I'm still just exploring, you know, what it means  
2 to have less or more SSA.

3 A. Uh-huh (affirmative).

4 Q. I'm wondering whether the fact of being married  
5 and being in an emotional and presumably a physical  
6 relationship with your wife, whether that -- that in and of  
7 itself, that relationship is one of the things that creates  
8 less space for SSA?

9 A. That's a good question. And no, I would say the  
10 opposite. I would say not having the tools I have and  
11 before learning about this stuff, marriage would sometimes  
12 intensify them.

13 They would intensify the stress and the concern  
14 and the -- you know, marriage is not the answer to SSA or  
15 homosexuality or anything. Marriage is a whole different  
16 category. Being married can be really stressful and  
17 difficult, and I'd say that that can add to it. It doesn't  
18 serve as a pressure release, not for me at least.

19 Q. Why did you decide to get married?

20 A. I knew that I loved my wife, and I knew that I  
21 wanted children, and I knew that I wanted to be happy. And  
22 I believe that marriage was the conduit to that. It was the  
23 boat to get me there. Based on other members of my church,  
24 based on other men I had met in this community, seeing that  
25 they were happily married, it gave me hope. So for all



1 was troubling? What -- what --

2 A. Yeah. It was, Can you recall any difficulties,  
3 any -- any memories or any experiences that were especially  
4 difficult or traumatic or intense for you? And I had always  
5 had that in the back of my mind but never put it, you know,  
6 in that much light before. But I had always known of that  
7 experience with my dad. Uh-huh (affirmative).

8 Q. And that's the subject matter of a lot of the JIM  
9 processes are sort of going back into one's past and  
10 reencountering in some way a moment of trauma or -- or other  
11 difficulty?

12 A. Yeah. Yeah. I'd say that's safe to say.

13 Q. Okay. You had mentioned before that you were the  
14 chairman of Evergreen up to relatively recently?

15 A. Uh-huh (affirmative).

16 Q. And what occurred to -- to conclude that?

17 A. North Star and Evergreen merged.

18 Q. And so you were the chairman of Evergreen at the  
19 time that the two organizations merged?

20 A. Yes.

21 Q. Did Evergreen have a particular position on -- on  
22 reparative therapy?

23 A. Not necessarily. Not that I'm aware.

24 Q. Did it endorse it in any way, the organization?

25 A. I think Evergreen endorsed anything that would