

EXHIBIT 56

SUPERIOR COURT OF THE STATE OF NEW JERSEY

HUDSON COUNTY, LAW DIVISION

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

Plaintiffs,

vs. No. L-5473-12

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.

VIDEOTAPED DEPOSITION OF RALEIGH CLOUGH

Taken in behalf of the Defendants

March 31, 2014
Portland, Oregon

1 and in the relationship I had with her, the less
2 I really even felt -- I didn't feel any
3 compulsions. I wasn't using pornography at that
4 point when I was dating her, I didn't really feel
5 like the attraction towards men were a big issue.
6 We weren't being sexual in our relationship at
7 that point so I wasn't really having a struggle
8 with that, but we were very emotionally close.
9 So we got engaged and like I said, we got married
10 a week shy of my 21st birthday, and for the first
11 year of our marriage it was really great.

12 I really didn't feel any issues with
13 attraction to men. We had a really good sex life
14 for the first year of our marriage. We were
15 insanely busy. I was really busy with school and
16 work, and she was really busy at work, she had
17 just gotten a promotion, so we didn't have a lot
18 of time on our hands, so when we did manage to
19 connect, we connected real strongly.

20 Then a year after we got married we moved to
21 Michigan, where I went to grad school for
22 physical therapy. And that is where I start,
23 that's where I discovered that it was possible to
24 find men in all sorts of places and hook up for
25 anonymous sex. And kind of the stresses of grad

1 school and our time schedule got even tighter and
2 it was just one of those times when I was really
3 stressed out and happened to be in the right
4 place, right time, or wrong place, wrong time,
5 however you look at it, and discovered this whole
6 thing, and that became an overpowering outlet for
7 me for stress. And the more I went there, the
8 stronger the attractions, the stronger the
9 awareness of that until it became an
10 all-encompassing in me, and I really started to
11 feel like a split person. I felt like on one
12 hand I really did love my wife and I really
13 wanted to be with her and wanted to be complete
14 with her, and on the other hand I had these
15 sexual desires, and that's where I started to
16 feel the real split, that my attractions to my
17 wife were emotional and spiritual and I could
18 really feel strongly with that, but my sexual
19 attractions were still completely towards men.

20 I can silence my phone if I need to.

21 Q. No.

22 A. So, yes.

23 Q. So how long did you engage in acting out with
24 other men while you were married?

25 A. So it started a year into my marriage. That

1 would have made me 22. Twelve years.

2 Q. How often would you do this?

3 A. It varied quite a bit depending on where we lived
4 and my accessibility to it. So anything from a
5 couple times a week to once a month, really
6 depending on availability.

7 Q. And did your wife ever find out about this while
8 it was going on?

9 A. My wife did not ever find out the physical
10 encounters with other men while it was going on.
11 She discovered porn and knew that I was back into
12 struggling with same sex attraction issues
13 probably about five years into our marriage.

14 Q. Did you find the lifestyle you were living
15 satisfying?

16 MR. WOLFE: Objection, leading.

17 THE WITNESS: No. No. What I was living
18 was, felt like a split life. It felt like on one
19 hand I was being a loving dutiful husband and
20 involved at church and responsible at work. And
21 on the other hand, I was going down a path that I
22 didn't feel like I wanted to go down but I didn't
23 feel like I had any control over. I felt like it
24 was just where I had to be and what I had to do.
25 And if I didn't get that connection, if I didn't

1 get that affirmation, then I wouldn't be whole
2 and I wouldn't be able to survive.

3 BY MR. JONNA:

4 Q. So what, at some point you decided to address
5 your same sex attraction through therapy. Tell
6 us what got you there and what led you to that.

7 A. It had -- because it had become such a secret for
8 me, which was kind of odd because in high school
9 it wasn't a big secret, I had friends who knew
10 and that was interesting, but I made the
11 conscious decision not to go down that path after
12 high school. So at that point, new friends that
13 I made, we moved to new places, it wasn't
14 anything that I talked about to anyone. I lost
15 track of my thought.

16 But because the split in what I was doing
17 and what I was living started to feel so
18 untenable and I just couldn't handle it anymore,
19 it got to a point in 2003, so 12 years into our
20 marriage, I had been acting out for about 11
21 years, in 2003 it got to a point where I really
22 felt like I needed to talk to somebody about it,
23 I needed to do something about it. I didn't feel
24 like it could go on.

25 I contemplated divorcing my wife, I don't

1 know even how many times during the preceding 11
2 years but I didn't want to do that to her. I
3 didn't want to lose her connection and
4 companionship and friendship. So, I opened
5 myself up, first of all, to a pastor at the
6 church we were going to in a small group that I
7 was in with him and simply asked for prayer. I
8 just asked for people to pray for me for purity
9 in my heart because I felt like I was just too
10 split. I didn't come out and I wasn't really
11 forthright with what I was struggling with, but
12 by simply putting the request out, I felt like he
13 got at least the direction of what I was talking
14 about.

15 And within the six months that took place
16 after that prayer request, I did start to feel a
17 shift in me, and it wasn't a shift of lessening
18 of attractions, what it was was a change in how I
19 was seeing things. I started to see it not so
20 much as, not so much as a good thing that I was
21 going after, I started to become aware that it
22 felt more like a compulsion. And I started to
23 also start to see some of the men that I was
24 acting out with as also being really desperate
25 and compulsive in the way we were interacting

1 with each other and I was, this isn't real love,
2 this isn't sharing anything positive, this is
3 kind of just desperate of taking care of an urge
4 and then separating and go to some other place.
5 So it started to seem and feel less healthy and
6 more unnatural to me.

7 And so six months after that prayer request,
8 my wife and were visiting with some friends, with
9 two other pairs of couples that we had been
10 involved in ministry at church with for the last
11 three years before that, and at this point my
12 wife knew I was dealing with certainly a porn
13 issue and it was gay porn and I was really
14 struggling with that. She didn't know I had been
15 meeting other people and acting out. But we were
16 just sharing late into the night with the other
17 two couples, and I just felt like I need to get
18 specific about what I'm dealing with, somebody
19 needs to know about it.

20 So I just asked her, I slipped her a note
21 saying, is it okay if I share the specifics of
22 what I am dealing with. And she is like, it's
23 your story, whatever. So I opened up to those
24 other four people, two couples, that I was
25 attracted to men, that I was compulsively dealing

1 with a pornography issue and masturbation and
2 just didn't know how to deal with that and I
3 really wanted to find a way out of it.

4 And because it was a church group, because
5 these were friends that we did ministry and stuff
6 with, I didn't know, I thought they would walk
7 away, I felt like I would be rejected or
8 something. Instead, they kind of surrounded me
9 and said, hey, we all have issues. What can we
10 do to support you in this? I felt loved in that
11 moment and that space, and that took so much of
12 the pressure off of feeling like I have to hide
13 this secret, somebody knew, and so I was kind of
14 able to kind of enter into. I still didn't know
15 what to do about it, but I felt much more
16 supported. And at that point, the compulsion to
17 hook up with other men just started to nosedive,
18 it was so much less often.

19 I think, I really have been thinking about
20 this, trying to think how many times I met up
21 with men for sex after that. It wasn't more than
22 three times, it was either two or three times.
23 It was just a handful of times. And the final
24 time that I reached out to another man for a
25 sexual encounter was probably three or four

1 THE WITNESS: Not specifically. I don't
2 think we ever really specifically talked about
3 causes of homosexuality. We were more talking
4 about issues surrounding my sense of myself as a
5 man and how I perceived myself and perceived
6 other men and related to them.

7 Q. Did he ever denigrate homosexual people in any
8 way?

9 A. No.

10 MR. WOLFE: Objection, leading.

11 BY MR. JONNA:

12 Q. Did he refer to homosexuality as a mental
13 disease?

14 A. No.

15 MR. WOLFE: Same objection.

16 BY MR. JONNA:

17 Q. So, how did the therapy with Mr. Heffner impact
18 you, and specifically, your same sex attractions?

19 MR. WOLFE: Same objection.

20 THE WITNESS: So the fact that I felt with
21 my therapy with Thaddeus was just an increased
22 sense of who I was and an increased sense of my
23 own personal space and boundaries and
24 assertiveness. I think assertiveness was
25 probably the biggest thing. Also, my ability to

1 connect with my own emotions and identify them
2 and feel them and process them and not let them
3 kind of run away with me. So those were my
4 strongest, that was the strongest feeling that I
5 had coming out of it.

6 What practically happened with that was that
7 I was able to reach out and connect with and talk
8 with the men in my community and more just be
9 myself and not feeling like, I have got to get a
10 circle of men, I have got to get a men's group or
11 something going. And in the process of being in
12 the space and letting it be and just being
13 myself, I was able to get a men's group going and
14 develop, start to develop come deeper friendships
15 with a handful of men. It put me in a space
16 where, once again, I felt on a level playing
17 field and felt more connected to the men in my
18 life.

19 BY MR. JONNA:

20 Q. So you mentioned that the JIM weekend, after the
21 JIM weekend you experienced a reduction in your
22 same sex attraction?

23 A. Right.

24 Q. You mentioned that you experienced a further
25 reduction after your work with Thaddeus. How

1 have been very distinct. And I think I started
2 to work on the compulsive, addictive stuff first,
3 like these behaviors are running my life and
4 ruining my life and I need to find a way out of
5 them. And that's what I started to do in 2003
6 and into 2004, disconnecting from that repetitive
7 compulsive, addictive pattern of acting out in
8 that way.

9 Underneath that, I think the thing that felt
10 to me like what drove me there in the first place
11 was this sense of inadequacy within my own
12 masculinity, and I needed to do something about
13 that. And that was kind of the sexual attraction
14 piece that drove it all, that was connected to
15 and related to the addictive, compulsive
16 behaviors, but not the same thing as that. So
17 that's the work that I started to do through JIM
18 and the follow-up piece that I did with Thaddeus
19 a couple years later.

20 That has been reinforcing and kind of coming
21 underneath the addictive, compulsive work that I
22 was doing and giving me a framework and an
23 understanding to lose the power that that had.
24 Because I felt it was a lot of work to try to
25 disconnect from all this behavior and I was