

LITE DEPALMA GREENBERG, LLC

Bruce D. Greenberg (N.J. Bar ID 14951982)
570 Broad Street – Suite 1201
Newark, NJ 07102
(973) 623-3000

SOUTHERN POVERTY LAW CENTER

David C. Dinielli (admitted *pro hac vice*)
Scott D. McCoy (admitted *pro hac vice*)
400 Washington Ave.
Montgomery, AL 36104
(334) 956-8200

CLEARY GOTTLIEB STEEN & HAMILTON LLP

Luke A. Barefoot (admitted *pro hac vice*)
Lina Bensman (admitted *pro hac vice*)
Thomas S. Kessler (admitted *pro hac vice*)
One Liberty Plaza
New York, NY 10006
(212) 225-2000

Attorneys for Plaintiffs

Michael Ferguson, Benjamin Unger, 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
HUDSON COUNTY, LAW DIVISION

Docket No. L-5473-12

CIVIL ACTION

**CERTIFICATION OF LINA
BENSMAN, ESQ. IN SUPPORT OF
REPLY IN SUPPORT OF
PLAINTIFF’S MOTION TO
ENFORCE PERMANENT
INJUNCTION AND FOR DEFAULT
JUDGMENT**

I, Lina Bensman, hereby certify as follows:

I am an associate at the law firm Cleary Gottlieb Steen & Hamilton LLP, co-counsel for Plaintiffs Michael Ferguson, Benjamin Unger, Chaim Levin, and Jo Bruck in this action.¹ By order of this Court, I have been admitted *pro hac vice* as one of the counsel of record for Plaintiffs in this case. I am familiar with the facts and circumstances of this matter.

1. At the time that Plaintiffs filed their Motion to Enforce the Permanent Injunction on March 27, 2019 (the “Second Motion”), Plaintiffs had not yet reached an agreement with Defendants regarding the treatment of confidential information contained in documents produced by Defendants on November 16, 2018. Accordingly, Plaintiffs designated each such document that accompanied the Second Motion as “Highly Confidential” and filed them under seal with this Court. In emails between counsel for Plaintiffs and Defendants exchanged between April 26 and May 14, 2019, Defendants agreed that the documents produced on November 16, 2018—including those previously filed under seal by Plaintiffs—do not need to be treated as confidential, so long as they are redacted to eliminate identifying information of non-parties who sought or obtained therapy and any sensitive personal information (i.e., bank account information, home addresses). As a result of the parties’ agreement, Plaintiffs are now filing public, redacted versions of Exhibits 11-26, 29-32, 35-44, 48, 50-51, 53, 57-62, as well as the attachments to the emails in Exhibits 9 and 56 of the *Certification of Lina Bensman in Support of Lina Bensman in Support of the Motion to Enforce the Permanent Injunction and for Default Judgment*, dated March 27, 2019.

¹ Capitalized terms used herein but not defined shall have the meaning ascribed to them in the *Brief in Support of Motion to Enforce Permanent Injunction and for Default Judgment*, dated March 27, 2019.

2. Consistent with the parties' agreement of May 14, 2019, all exhibits accompanying the present certification that are comprised of documents produced by Defendants on November 18, 2018—namely, Exhibits 66, 68, 74, 75—are being filed publicly with redactions, while unredacted copies of these exhibits are designated as “Highly Confidential” documents and are being filed under seal with the Court. These exhibits are marked with an asterisk below.

3. A true and complete copy of JIFGA's 2016 Form 990-EZ is attached as Exhibit 63.

4. A true and complete copy of the cited excerpts from the February 19, 2014 deposition of Defendant Arthur Goldberg, is attached as Exhibit 64.

5. A true and complete copy of the cited excerpts from the February 20, 2014 deposition of Defendant Elaine Berk, is attached as Exhibit 65.

6. A true and complete copy of the email dated July 4, 2018, from an individual to info@jifga.org, and forwarded by ejsbtb@aol.com to the jonahhelp@aol.com email address, Bates-stamped JIFGA-00063172, is attached as Exhibit 66.*

7. A true and complete copy of the cited excerpts from Volume 1 of the June 3, 2015 trial transcript is attached as Exhibit 67.

8. A true and complete copy of the email dated March 23, 2016, from an individual to info@jifga.org, to which Arthur Goldberg responded on March 27, 2016, copying Elaine Berk, Bates-stamped JIFGA-00033711, is attached as Exhibit 68.*

9. A true and complete copy of the email chain dated November 28, 2009, between Arthur Goldberg, Jo Bruck, and Sheldon Bruck, Bates-stamped FGSN00006824–25, is attached as Exhibit 69.

10. A true and complete copy of the email chain dated July 18, 2007, between Arthur Goldberg and an individual, Bates-stamped JON 016295-97, is attached as Exhibit 70.

11. A true and complete copy of the cited excerpts from the February 18, 2014 deposition of Defendant JONAH, Inc., is attached as Exhibit 71.

12. A true and complete copy of the cited excerpts from Volume 1 of the June 8, 2015 trial transcript is attached as Exhibit 72.

13. A true and complete copy of the email chain dated June 4, 2008, between Arthur Goldberg and an individual, Bates-stamped JON 017111-12, is attached as Exhibit 73.

14. A true and complete copy of an email dated May 21, 2018, from an individual to info@jonahweb.org, Bates-stamped JIFGA-00061224 is attached as Exhibit 74.*

15. A true and complete copy of the email chain dated June 8, 2017, between Arthur Goldberg, an individual, and others listed in copy, Bates-stamped JIFGA-00048040, is attached as Exhibit 75.*

16. A true and complete copy of the email chain dated April 27, 2009, between Rich Wyler and Arthur Goldberg, Bates-stamped JON 013067-69 is attached as Exhibit 76.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 24, 2019
New York, NY

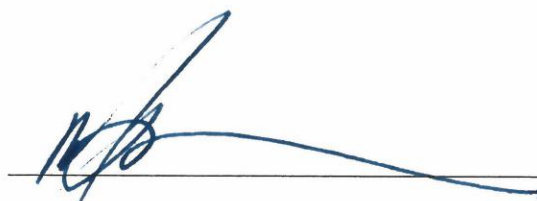

Lina Bensman

Exhibit 63

Click on the question-mark icons to display help windows.
The information provided will enable you to file a more complete return and reduce the chances the IRS has to contact you

Form **990-EZ** **Short Form** **Return of Organization Exempt From Income Tax** OMB No 1545-1150
 Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

2016

Open to Public Inspection

▶ Do not enter social security numbers on this form as it may be made public.
 ▶ Information about Form 990-EZ and its instructions is at www.irs.gov/form990.

Department of the Treasury
Internal Revenue Service

A For the 2016 calendar year, or tax year beginning 2016, and ending 20

B Check if applicable:
 Address change
 Name change
 Initial return
 Final return/terminated
 Amended return
 Application pending

C Name of organization JEWISH INSTITUTE FOR GLOBAL AWARENESS
 Number and street (or P.O. box, if mail is not delivered to street address) 80 GRAND STREET Room/suite _____
 City or town, state or province, country, and ZIP or foreign postal code JERSEY CITY NJ 07302

D Employer identification number 81-0950956
E Telephone number 201-433-3444
F Group Exemption Number 2

G Accounting Method: Cash Accrual Other (specify) _____

H Check if the organization is not required to attach Schedule B (Form 990, 990-EZ, or 990-PF).

I Website: _____

J Tax-exempt status (check only one) - 501(c)(3) 501(c) () (insert no.) 4947(a)(1) or 527

K Form of organization: Corporation Trust Association Other _____

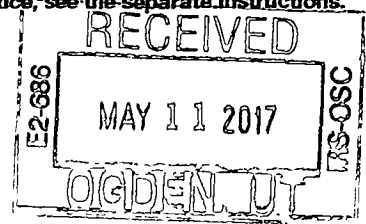
L Add lines 5b, 6c, and 7b to line 9 to determine gross receipts. If gross receipts are \$200,000 or more, or if total assets (Part II, column (B) below) are \$500,000 or more, file Form 990 instead of Form 990-EZ. \$ _____

Part I Revenue, Expenses, and Changes in Net Assets or Fund Balances (see the instructions for Part I)

Check if the organization used Schedule O to respond to any question in this Part I

Line	Description	Amount
1	Contributions, gifts, grants, and similar amounts received	45923
2	Program service revenue including government fees and contracts	29618
3	Membership dues and assessments	
4	Investment income	
5a	Gross amount from sale of assets other than inventory	
5b	Less: cost or other basis and sales expenses	
5c	Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a)	
6	Gaming and fundraising events	
6a	Gross income from gaming (attach Schedule G if greater than \$15,000)	
6b	Gross income from fundraising events (not including \$ _____ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000)	
6c	Less: direct expenses from gaming and fundraising events	
6d	Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)	
7a	Gross sales of inventory, less returns and allowances	
7b	Less: cost of goods sold	
7c	Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a)	
8	Other revenue (describe in Schedule O)	
9	Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8	75541
10	Grants and similar amounts paid (list in Schedule O)	
11	Benefits paid to or for members	
12	Salaries, other compensation, and employee benefits	
13	Professional fees and other payments to independent contractors <u>1099</u>	42549
14	Occupancy, rent, utilities, and maintenance	
15	Printing, publications, postage, and shipping	417
16	Other expenses (describe in Schedule O)	11831
17	Total expenses. Add lines 10 through 16	54797
18	Excess or (deficit) for the year (Subtract line 17 from line 9)	20744
19	Net assets or fund balances at beginning of year (from line 27, column (A)) (must agree with end-of-year figure reported on prior year's return)	
20	Other changes in net assets or fund balances (explain in Schedule O)	
21	Net assets or fund balances at end of year. Combine lines 18 through 20	20744

SCANNED JUN 05 2017



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Part II Balance Sheets (see the instructions for Part II)

Check if the organization used Schedule O to respond to any question in this Part II

	(A) Beginning of year	(B) End of year
22 Cash, savings, and investments		22 70744
23 Land and buildings		23
24 Other assets (describe in Schedule O)		24
25 Total assets		25 70744
26 Total liabilities (describe in Schedule O)		26
27 Net assets or fund balances (line 27 of column (B) must agree with line 21)		27 70744

Part III Statement of Program Service Accomplishments (see the instructions for Part III)

Check if the organization used Schedule O to respond to any question in this Part III

Expenses
(Required for section 501(c)(3) and 501(c)(4) organizations; optional for others.)

What is the organization's primary exempt purpose? _____

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. In a clear and concise manner, describe the services provided, the number of persons benefited, and other relevant information for each program title.

28		
29	(Grants \$) If this amount includes foreign grants, check here <input type="checkbox"/>	29a N/A
30	(Grants \$) If this amount includes foreign grants, check here <input type="checkbox"/>	30a N/A
31	Other program services (describe in Schedule O) (Grants \$) If this amount includes foreign grants, check here <input type="checkbox"/>	31a
32	Total program service expenses (add lines 28a through 31a)	32

Part IV List of Officers, Directors, Trustees, and Key Employees (list each one even if not compensated—see the instructions for Part IV)

Check if the organization used Schedule O to respond to any question in this Part IV

(a) Name and title	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC) (if not paid, enter -0-)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	(e) Estimated amount of other compensation
THEODORE BERK TRUSTEE / CEO	✓	-0-	-0-	-0-
ELAINE BERK TRUSTEE / CO-DIRECTOR	35	-0-	-0-	-0-
ARTHUR GOLDBERG CO-DIRECTOR / TRUSTEE	35	-0-	-0-	-0-
JANE GOLDBERG TRUSTEE	5	-0-	-0-	-0-

Part V Other Information (Note the Schedule A and personal benefit contract statement requirements in the instructions for Part V) Check if the organization used Schedule O to respond to any question in this Part V.

		Yes	No
33	Did the organization engage in any significant activity not previously reported to the IRS? If "Yes," provide a detailed description of each activity in Schedule O		<input checked="" type="checkbox"/>
34	Were any significant changes made to the organizing or governing documents? If "Yes," attach a conformed copy of the amended documents if they reflect a change to the organization's name. Otherwise, explain the change on Schedule O (see instructions)		<input checked="" type="checkbox"/>
35a	Did the organization have unrelated business gross income of \$1,000 or more during the year from business activities (such as those reported on lines 2, 6a, and 7a, among others)?		<input checked="" type="checkbox"/>
35b	If "Yes," to line 35a, has the organization filed a Form 990-T for the year? If "No," provide an explanation in Schedule O		<input checked="" type="checkbox"/>
35c	Was the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization subject to section 6033(e) notice, reporting, and proxy tax requirements during the year? If "Yes," complete Schedule C, Part III		<input checked="" type="checkbox"/>
36	Did the organization undergo a liquidation, dissolution, termination, or significant disposition of net assets during the year? If "Yes," complete applicable parts of Schedule N		<input checked="" type="checkbox"/>
37a	Enter amount of political expenditures, direct or indirect, as described in the instructions	37a	
37b	Did the organization file Form 1120-POL for this year?		<input checked="" type="checkbox"/>
38a	Did the organization borrow from, or make any loans to, any officer, director, trustee, or key employee or were any such loans made in a prior year and still outstanding at the end of the tax year covered by this return?		<input checked="" type="checkbox"/>
38b	If "Yes," complete Schedule L, Part II and enter the total amount involved	38b	
39	Section 501(c)(7) organizations. Enter:		
39a	a Initiation fees and capital contributions included on line 9	39a	
39b	b Gross receipts, included on line 9, for public use of club facilities	39b	
40a	Section 501(c)(3) organizations. Enter amount of tax imposed on the organization during the year under: section 4911; section 4912; section 4955		
40b	b Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in any section 4958 excess benefit transaction during the year, or did it engage in an excess benefit transaction in a prior year that has not been reported on any of its prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I		<input checked="" type="checkbox"/>
40c	c Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax imposed on organization managers or disqualified persons during the year under sections 4912, 4955, and 4958		
40d	d Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Enter amount of tax on line 40c reimbursed by the organization		
40e	e All organizations. At any time during the tax year, was the organization a party to a prohibited tax shelter transaction? If "Yes," complete Form 8886-T		<input checked="" type="checkbox"/>
41	List the states with which a copy of this return is filed		
42a	The organization's books are in care of <u>THEODORE BERK</u> Telephone no. <u>2017678565</u> Located at <u>36 ELLIOT ROAD HARRINGTON PR NE</u> ZIP + 4 <u>07640</u>		
42b	b At any time during the calendar year, did the organization have an interest in or a signature or other authority over a financial account in a foreign country (such as a bank account, securities account, or other financial account)? If "Yes," enter the name of the foreign country:	42b	<input checked="" type="checkbox"/>
42c	See the instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR). c At any time during the calendar year, did the organization maintain an office outside the United States? If "Yes," enter the name of the foreign country:	42c	<input checked="" type="checkbox"/>
43	Section 4947(a)(1) nonexempt charitable trusts filing Form 990-EZ in lieu of Form 1041—Check here and enter the amount of tax-exempt interest received or accrued during the tax year	43	<input type="checkbox"/>
44a	Did the organization maintain any donor advised funds during the year? If "Yes," Form 990 must be completed instead of Form 990-EZ	44a	<input checked="" type="checkbox"/>
44b	b Did the organization operate one or more hospital facilities during the year? If "Yes," Form 990 must be completed instead of Form 990-EZ	44b	<input checked="" type="checkbox"/>
44c	c Did the organization receive any payments for indoor tanning services during the year?	44c	<input checked="" type="checkbox"/>
44d	d If "Yes" to line 44c, has the organization filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O	44d	
45a	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	45a	<input checked="" type="checkbox"/>
45b	b Did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," Form 990 and Schedule R may need to be completed instead of Form 990-EZ (see instructions)	45b	<input checked="" type="checkbox"/>

	Yes	No
46 Did the organization engage, directly or indirectly, in political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I	46	<input checked="" type="checkbox"/>

Part VI Section 501(c)(3) organizations only

All section 501(c)(3) organizations must answer questions 47-49b and 52, and complete the tables for lines 50 and 51.

Check if the organization used Schedule O to respond to any question in this Part VI

	Yes	No
47 Did the organization engage in lobbying activities or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II	47	<input checked="" type="checkbox"/>
48 Is the organization a school as described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	48	<input checked="" type="checkbox"/>
49a Did the organization make any transfers to an exempt non-charitable related organization?	49a	<input checked="" type="checkbox"/>
b If "Yes," was the related organization a section 527 organization?	49b	<input checked="" type="checkbox"/>

50 Complete this table for the organization's five highest compensated employees (other than officers, directors, trustees, and key employees) who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."

(a) Name and title of each employee	(b) Average hours per week devoted to position	(c) Reportable compensation (Forms W-2/1099-MISC)	(d) Health benefits, contributions to employee benefit plans, and deferred compensation	(e) Estimated amount of other compensation
<i>None!</i>				

f Total number of other employees paid over \$100,000 2

51 Complete this table for the organization's five highest compensated independent contractors who each received more than \$100,000 of compensation from the organization. If there is none, enter "None."

(a) Name and business address of each independent contractor	(b) Type of service	(c) Compensation
<i>None!</i>		

d Total number of other independent contractors each receiving

52 Did the organization complete Schedule A? **Note:** All sections completed Schedule A

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information provided.

Sign Here Signature of officer *Heodore Beck, CEO*
Type or print name and title

Paid Preparer Use Only Print/Type preparer's name Preparer's signature
Firm's name
Firm's address

May the IRS discuss this return with the preparer shown above? See instructions.

SCHEDULE A
(Form 990 or 990-EZ)

Public Charity Status and Public Support

OMB No. 1545-0047

2016

Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust.

▶ Attach to Form 990 or Form 990-EZ.

▶ Information about Schedule A (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

Name of the organization

LEWIS & CLARK INSTITUTE FOR GLOBAL AWARENESS

Employer identification number

81-0950958

Part I Reason for Public Charity Status (All organizations must complete this part.) See instructions.

The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1 A church, convention of churches, or association of churches described in **section 170(b)(1)(A)(i)**.
- 2 A school described in **section 170(b)(1)(A)(ii)**. (Attach Schedule E (Form 990 or 990-EZ).)
- 3 A hospital or a cooperative hospital service organization described in **section 170(b)(1)(A)(iii)**.
- 4 A medical research organization operated in conjunction with a hospital described in **section 170(b)(1)(A)(iii)**. Enter the hospital's name, city, and state:
- 5 An organization operated for the benefit of a college or university owned or operated by a governmental unit described in **section 170(b)(1)(A)(iv)**. (Complete Part II.)
- 6 A federal, state, or local government or governmental unit described in **section 170(b)(1)(A)(v)**.
- 7 An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in **section 170(b)(1)(A)(vi)**. (Complete Part II.)
- 8 A community trust described in **section 170(b)(1)(A)(vi)**. (Complete Part II.)
- 9 An agricultural research organization described in **section 170(b)(1)(A)(ix)** operated in conjunction with a land-grant college or university or a non-land-grant college of agriculture (see instructions). Enter the name, city, and state of the college or university:
- 10 An organization that normally receives: (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions—subject to certain exceptions, and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See **section 509(a)(2)**. (Complete Part III.)
- 11 An organization organized and operated exclusively to test for public safety. See **section 509(a)(4)**.
- 12 An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in **section 509(a)(1)** or **section 509(a)(2)**. See **section 509(a)(3)**. Check the box in lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
 - a **Type I.** A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. **You must complete Part IV, Sections A and B.**
 - b **Type II.** A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). **You must complete Part IV, Sections A and C.**
 - c **Type III functionally integrated.** A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). **You must complete Part IV, Sections A, D, and E.**
 - d **Type III non-functionally integrated.** A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). **You must complete Part IV, Sections A and D, and Part V.**
 - e Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.

f Enter the number of supported organizations

g Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1-10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
(A) <i>N/A</i>						
(B)						
(C)						
(D)						
(E)						
Total						

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)

(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Section A. Public Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")						
2 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
3 The value of services or facilities furnished by a governmental unit to the organization without charge		NOT APPLICABLE				
4 Total. Add lines 1 through 3						
5 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f)						
6 Public support. Subtract line 5 from line 4						

Section B. Total Support

Calendar year (or fiscal year beginning in) ►	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
7 Amounts from line 4						
8 Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources		NOT APPLICABLE				
9 Net income from unrelated business activities, whether or not the business is regularly carried on						
10 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
11 Total support. Add lines 7 through 10						
12 Gross receipts from related activities, etc. (see instructions)					12	
13 First five years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here <input type="checkbox"/>						

Section C. Computation of Public Support Percentage

14 Public support percentage for 2016 (line 6, column (f) divided by line 11, column (f))	14	%
15 Public support percentage from 2015 Schedule A, Part II, line 14	15	%
16a 33 1/3% support test—2016. If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization <input type="checkbox"/>		
b 33 1/3% support test—2015. If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and stop here. The organization qualifies as a publicly supported organization <input type="checkbox"/>		
17a 10%-facts-and-circumstances test—2016. If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here. Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization <input type="checkbox"/>		
b 10%-facts-and-circumstances test—2015. If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and stop here. Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization <input type="checkbox"/>		
18 Private foundation. If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions <input type="checkbox"/>		

Part III Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

Section A. Public Support

Calendar year (or fiscal year beginning in) ▶	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")					45923	45923
2 Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose					29618	29618
3 Gross receipts from activities that are not an unrelated trade or business under section 513						
4 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5 The value of services or facilities furnished by a governmental unit to the organization without charge						
6 Total. Add lines 1 through 5					75541	75541
7a Amounts included on lines 1, 2, and 3 received from disqualified persons						
b Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year						
c Add lines 7a and 7b						0
8 Public support. (Subtract line 7c from line 6.)						75541

Section B. Total Support

Calendar year (or fiscal year beginning in) ▶	(a) 2012	(b) 2013	(c) 2014	(d) 2015	(e) 2016	(f) Total
9 Amounts from line 6						75541
10a Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources						
b Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975						
c Add lines 10a and 10b						
11 Net income from unrelated business activities not included in line 10b, whether or not the business is regularly carried on						
12 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)						
13 Total support. (Add lines 9, 10c, 11, and 12.)						75541

14 First five years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here

Section C. Computation of Public Support Percentage

15 Public support percentage for 2016 (line 8, column (f) divided by line 13, column (f))	15	100	%
16 Public support percentage from 2015 Schedule A, Part III, line 15	16		%

Section D. Computation of Investment Income Percentage

17 Investment income percentage for 2016 (line 10c, column (f) divided by line 13, column (f))	17	N/A	%
18 Investment income percentage from 2015 Schedule A, Part III, line 17	18		%

- 19a 33 1/3% support tests—2016. If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and stop here. The organization qualifies as a publicly supported organization
- b 33 1/3% support tests—2015. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3%, and line 18 is not more than 33 1/3%, check this box and stop here. The organization qualifies as a publicly supported organization
- 20 Private foundation. If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions

Name of the organization

JEWISH INSTITUTE FOR GLOBAL AWARENESS

Employer identification number

81-0950956

OTHER EXPENSES LINE 66 990EZ

ADVISORY FEES TO NON PROFIT ORG	
TO REACH OUT TO THEIR	9540
CONSTITUENTS TO HELP JIFGA	
TRANSACTION FEES	1166
INSURANCE	1439
GOVERNMENT FEES	1008
WEB HOSTING	683

11831

Exhibit 64

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SUPERIOR COURT OF NEW JERSEY

HUDSON COUNTY, LAW DIVISION

-----x

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-5473-12

-----x

One Liberty Plaza
New York, New York

February 19, 2014
9:37 a.m.

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

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

1 GOLDBERG

2 answering, for example, the inquiries we get
3 via e-mail. I'm responsible for talking to the
4 people on the phone.

5 Q. Is there anything else that you or
6 she are uniquely responsible for or take the
7 lead role in?

8 A. No. After that, we discuss who
9 should do what.

10 Q. Do you always make decisions
11 together with her?

12 A. 99 percent of the time.

13 Q. What about decisions with respect to
14 which counselors to refer clients to?

15 A. That she leaves in my domain. She
16 knows I know them better.

17 Q. Why?

18 A. Because I have worked with many of
19 these people at weekends. I met them at
20 various conferences that I go to that she maybe
21 does not attend. So I'm more familiar with the
22 individual counselors.

23 Q. Is there anything similar to that
24 that Elaine Berk generally handles without you
25 having a tremendous amount of input or

1 GOLDBERG

2 more accurate?

3 A. Possibly.

4 Q. When you say, "I direct the
5 counseling clinic," putting aside how accurate
6 the word clinic is, but focusing on the word
7 direct, what does direct mean in this regard?

8 A. Direct means that I refer people to
9 counselors.

10 Q. Do you think that the words "I
11 direct counseling" conveys that you do nothing
12 other than refer people to outside counselors
13 over whom you have no control?

14 A. I don't believe so.

15 Q. Why do you use a word that is not
16 accurate?

17 MR. LI MANDRI: Objection. Asked
18 and answered. Argumentative.

19 A. I didn't say -- I said that I
20 believe it is a correct use of the term.

21 Q. So you believe that when you say, "I
22 direct counseling services," for example, there
23 is no risk that people might misunderstand and
24 think that you supervise and manage counselors
25 who work for you?

1 GOLDBERG

2 to those that JONAH offers?

3 A. No.

4 Q. Would you describe yourself as the
5 first responder to JONAH's hotline?

6 A. Yes.

7 Q. You said before that you primarily
8 are the one who speaks to prospective clients
9 by phone; is that right?

10 A. That is correct.

11 Q. Why is that?

12 A. Because I am in the office every
13 day.

14 Q. Why do you prefer to speak to people
15 by phone rather than communicating with them
16 over e-mail?

17 A. Because I'm an oral person.

18 Q. Is there an advantage to speaking to
19 people by phone rather than communicating with
20 them over e-mail?

21 A. You get a better feeling for where
22 they are coming from and what the issues are.
23 It's very hard to communicate in writing back
24 and forth. This way someone has a better --
25 says oh, yeah, that reminds me of such and such

Exhibit 65

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SUPERIOR COURT OF NEW JERSEY

HUDSON COUNTY, LAW DIVISION

-----x

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-5473-12

-----x

One Liberty Plaza
New York, New York

February 20, 2014
9:33 a.m.

DEPOSITION of ELAINE SILODOR BERK, taken
pursuant to Notice, held at the offices of
Cleary Gottlieb Steen & Hamilton, LLP, taken by
Fran Insley, a Notary Public of the States of
New York and New Jersey.

ELLEN GRAUER COURT REPORTING CO. LLC
126 East 56th Street, Fifth Floor
New York, New York 10022
212-750-6434
Ref: 106350

Exhibit 66

ARTHUR: Fwd: New Form Entry: Contact Form

From: ejsbtb@aol.com
To: jonahhelp@aol.com
Date: Wed, 04 Jul 2018 23:05:26 +0000

Sent from AOL Mobile Mail

From: **Redacted**
Date: Wednesday, July 4, 2018
Subject: New Form Entry: Contact Form
To: info <info@jifga.org>

You've just received a new submission to your Contact Form.

Submitted Information:

Name

Redacted

Email

Redacted

Comment

Dear Jifga! I have heard about Nicolosi's gay reparative therapy (I've read hungarian translation of the book : Shame and attachment loss from Nicolosi). Now I looking for a reparative therapist available in hungarian language. Thank you for your help, wish you all the best! **Redacted**

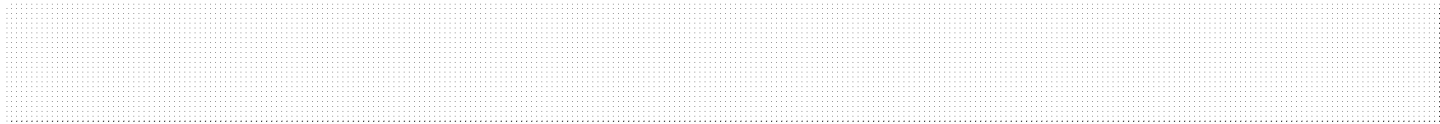


Exhibit 67

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CIVIL PART
HUDSON COUNTY
DOCKET NO. HUD-L-5473-12
APP. DIV. NO. _____

MICHAEL FERGUSON, et al.,	:	
	:	TRANSCRIPT
Plaintiffs,	:	
vs.	:	OF
	:	
JONAH, ARTHUR GOLDBERG, ALAN	:	TRIAL
DOWNING and ALAN DOWNING LIFE	:	
COACHING, L.L.C.,	:	
	:	
Defendants.	:	
	:	

Place: Hudson County Superior Court
Administration Building
595 Newark Avenue
Jersey City, N.J. 07306

Date: June 3, 2015
Volume 1 of 2
Pages 1 - 200

B E F O R E:

HONORABLE PETER F. BARISO, JR., A.J.S.C. and a Jury.

TRANSCRIPT ORDERED BY:

JODI ERICKSON, ESQ.,
(Cleary, Gottlieb, Steen & Hamilton, L.L.P.)

Audio Recorded by: C. Ortiz

////////////////////////////////////

METRO TRANSCRIPTS, L.L.C.

Kelly Ford

Patrice Mezzacapo

316 Ann Street
Randolph, New Jersey 07869
(973) 659-9494

////////////////////////////////////

Opening - LiMandri

67

1 collect it, but his father's not a part of it. So it
2 would be interesting if Mr. Unger can prove any -- that
3 he paid anyone to even be here in court asking for
4 money.

5 Mr. Levin's mother will say she paid for all
6 of his care. But since he needs to say I paid
7 something to be here in court, he'll come in and say I
8 think I paid some cash. But he can't -- he can't prove
9 that either, okay?

10 Mr. Bruck's mother paid the money for him.
11 His -- his parents have joint accounts or whatever. It
12 came out of the parent's account, but the mother is a
13 party for that reason because she said I -- he didn't
14 pay. So he's not a party.

15 So the only one who can say he paid anything
16 was Mr. Ferguson. He was 25. He was a medical student
17 at the time and was really there to see Mr. Downing,
18 because, again, they're both Mormon, they met at one of
19 these weekends. JONAH didn't send Mr. Ferguson to one
20 of these weekends. He went on his own because he had
21 been to all these other different programs, Sexaholics
22 Anonymous, couple of different Mormon programs, couple
23 different counselors at Brigham Young University. He
24 went to Brigham Young, which a lot of Mormons do who
25 are raised Mormon in Salt Lake City. He went on a

Opening - LiMandri

68

1 Mormon mission. Him and Mr. Downing spent a lot of
2 time talking about their common Mormon faith. If the
3 men who come to JONAH want to talk about their Jewish
4 faith, then Mr. Downing can do that or they have rabbis
5 that they will refer people to for that purpose.

6 They founded what Mr. Dinielli referred to as
7 a Listserv. That's one of the components that JONAH
8 will use to help its Jewish clients. Remember it
9 started originally for Jews. It spread out to Gentiles
10 -- well, it spread out to people who were non-Jews, and
11 it also spread out, I will tell you, in types of
12 referrals. Because people were coming to them. It
13 wasn't just now sexual problems related to
14 homosexuality but heterosexuals would come with
15 obsessive compulsive issues, men in adulterous
16 relationships they couldn't get out, of or pornography
17 issues are just as bad, you know. All communities, I
18 would assume unfortunately, but they get a lot wanting
19 help with both types of addictions and other types of
20 -- of addictions. You know, people with gender issues.
21 And they would find a counselor somewhere in the nation
22 if they had to see the person by Skype, and they made
23 the financial arrangements with that person.

24 The way it works, how JONAH was able to fund
25 itself is they're a non-profit, so they can get

Exhibit 68

Re: Purim Greetings from JIFGA (2)

From: Arthur Goldberg <jonahhelp@aol.com>

To: **Redacted**

Cc: ejsbtb@aol.com

Date: Sun, 27 Mar 2016 03:34:22 +0000

Redacted

Many thanks for your suggestion. We have thought of that possibiity but the risk is high since the judgment was not only against JONAH as an entity but also us as individuals. Other than the primary prohibition on referring people to counselors, we are free to speak about the mockery of justice of the judicial process and also to explain the morality of the issue....which we expect to do through our new organization. Any suggestions for audiences where we can speak would be appreciated. Also, we are planning on doing some publications, assuming we can raise a few dollars to pay for the printing and distribution.

I'd love to catch up with you one of these days.....at least by phone if not in person.

Best wishes,
Arthur

----- Forwarded message -----

From: **Redacted**
Date: Wed, Mar 23, 2016 at 3:41 PM
Subject: Re: Purim Greetings from JIFGA
To: info@jifga.org

Have you ever given any thought to moving your reparative therapy ministry across the line into Pennsylvania.

Sincerely,

Redacted

VOL

Sent from my iPad

On Mar 23, 2016, at 11:10 PM, JIFGA <info@jifga.org> wrote:

Having trouble viewing this email? [Click here](#)

Greetings from JIFGA

In This Issue

A Milestone for JIFGA
JIFGA and the Purim Tradition

Quick Links

JIFGA Web

Contact

7 Noahide Laws

Donate

Dear **Redacted**

First, the two of us would like to thank our many friends for the kind words and consistent financial support that kept JONAH going during the last three trying years as we prepared for and engaged in the trial. As you know, the adverse and unjust verdict meant the forced closing down of JONAH. In spite of the often negative and blatantly false publicity that appeared in the mainstream press, your encouragement and good wishes as well as your consistent acknowledgement of the truth about what we were able to accomplish were a true blessing. It is regrettable that our "politically correct" society as represented by the trial court did not recognize the number of lives that were redeemed and saved by JONAH's efforts.

Second, concerning our future plans, we intend to lead a campaign to return our culture to one in which more traditional universal moral values (which are common to all major faiths) are understood and followed. We believe by doing so, all of us working together can produce just societies and help to anchor a politicalmoralcenter. Until recent times, any laws contradicting G-d's laws would have been unimaginable. Today we are witnessing a lessening within our culture of belief in and obedience to G-d's commandments. However, we believe this should be seen as a passing phase in our history. Just as trees and plants that may be withered by drought are restored and refreshed by rain, so too will adherence to the will of the Divine Spirit revive the parched souls living in western civilization. With this in mind, we have created the "Jewish Institute for Global Awareness" (JIFGA) as a not for profit organization that will fight for G-d's plan for the human race, one which includes respect for the dignity of all life. The Torah and the Talmud teach us that true respect in this context includes morality in sexual relations. Our vision for the new institute will be rooted in Biblical values and express a Biblical world-view. Please click here to see the beginning of our website, www.iifga.org. It explains our mission in greater detail.

The root of traditional values comes from Biblical principles revealed by G-d in the Seven Laws of Noah. These beliefs are common to those who follow the Abrahamic religions (Jews, Christians, and Muslims) and they constitute more than half of the world's population. We see the need for and thus are in the process of putting together a coalition of such believers. This coalition will advocate for the commonly held beliefs in the Divinely ordained moral imperatives and universal ethics known as the Seven Noahide Laws. We hope that those of you receiving this email will agree to participate in this endeavor through volunteering within your local area or by contributing monies or both.

A Milestone for JIFGA

On March 17, 2016, JIFGA received official notice from the IRS that's its 501 (c) (3) application to be recognized as a tax-exempt corporation was approved.

This means that going forward your donations are tax deductible to the full extent of US tax law.

Your donations support JIFGA's efforts to educate the public worldwide on the Noahide laws. We intend to explain how following these laws can be shown to benefit the individual and society. The educational activities will be carried out via discussions, lectures, forums, radio and television, publications and social media globally.

Already, the JIFGA directors have been invited to speak at conferences in the US and internationally. We are honored to be working with other organizations who share our values through education and presentations.

JIFGA and the Purim Tradition of Charitable Giving

According to the Megillah,

They are to observe these as days of feasting and gladness, and for sending delicacies to one another, and giving gifts to the poor. (Esther 9:22)

As parents we teach our children about giving to charity and how if we, our friends, neighbors and others collectively gave back, we may make a difference in the lives of people who need our help the most. Many families reinforce the idea of charity with the belief in working together to solve larger problems. When groups of people have the same goal on a large scale and work together to reach their objective, their work becomes a larger "Force for Good". It is this joining of effort among like-minded people that JIFGA is working to promote.

The Talmud says that the biggest problem of the Jewish people at the time of Mordechai and Esther was a lack of unity. It was the wicked Haman who reminded us that we stand together as one people: In plotting genocide, he referred to the Jews as Am Echad (one people) -- and planned that they should literally "hang together."

The Talmud says Kol Yisrael Araivim-- each Jew is responsible one for the other. If the boat is sinking, we're all going down. But when there is love and unity amongst us, even the wrongdoers become righteous and our enemies cannot harm us!

Some maintain that the Purim mitzvah of shalach manos may be fulfilled by sending not food, but instead, words of Torah. Since the purpose of this mitzvah is to unite mankind, we are instructed that it may be fulfilled by things other than food to meet this goal. And what better method is there than by sharing words of Torah and the Talmudic tradition as reflected by the Seven Noahide Laws?

So, will you please join JIFGA in community outreach by sharing with others that G-d's message to Noah gave us universal moral ethics by which we are to live and build a better society for all His people. To support us in this mission, we welcome donations via our site, jifga.org, or by mail at JIFGA, PO Box 313, Jersey City, NJ 07303.

The IRS has just given approval to JIFGA as a 501(c) (3) tax-exempt corporation. This means that your donations are tax deductible to the full extent of US tax law.

Best wishes for Frailech (festive) Purim to our Jewish brethren and Happy Easter to our Christian friends,

Arthur Goldberg and Elaine Silodor Berk

JIFGA Co-Directors

Jewish Institute for Global Awareness

JIFGA, P.O. Box 313, Jersey City, NJ 07303

[SafeUnsubscribe™ david@virtueonline.org](#)

[Forward this email](#) | [About our service provider](#)

Sent by info@jifga.org in collaboration with

Try it free today

Exhibit 69

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From: autodude18@aol.com
Sent: Saturday, November 28, 2009 7:10 PM
To: Jonahhelp@aol.com
Subject: Re: Request to JONAH for assistance: Autodude18

Hey, it's Sheldon. I'm in NY till this Tuesday, then I would like to start working with Jonah. Please set me up with a counselor. Thanks!

-----Original Message-----

From: Jonahhelp@aol.com
To: Moshky@aol.com
Cc: Autodude18@aol.com
Sent: Sun, Nov 15, 2009 9:19 pm
Subject: Re: Request to JONAH for assistance: Autodude18

Hello,

Would you please ask Sheldon to call me so I can determine which counselor to assign him to within the organization? If you get this tonight, I will be up until about 11 EST. Or he can call tomorrow. My numbers, once again, are home 201 434 6629, cell 917 929 0087, and office 201 433 3444. Alternatively, if you provide me with his cell or the home number, I will be happy to place the call.

Thanks,
Arthur Goldberg, co-director, JONAH

In a message dated 11/15/2009 2:59:40 P.M. Eastern Standard Time, Moshky writes:

Hi. Thanks for writing. I just got the "go ahead" from Sheldon to give my consent regarding your program. He has spoken to me & my husband & we are all on board. Thank you, Jo Bruck

-----Original Message-----

From: Jonahhelp@aol.com
To: Moshky@aol.com
Cc: Autodude18@aol.com
Sent: Mon, Oct 12, 2009 7:59 pm
Subject: Request to JONAH for assistance

Dear Mrs. Bruck,

Your son Sheldon has been in touch with us at JONAH (www.jonahweb.org) concerning his personal struggle with a perception that he is "gay" while also having feelings for a girl he knows. He has expressed great confusion about his sexuality and contacted us since we at JONAH are the only Jewish based organization in the world that works with those unhappy with their sexual confusion in order to help them realize their heterosexual potential. We have letters of approbation from numerous rabbis including, for example, Michel Twerski, Shmuel Kamenetsky, Noach Weinberg, and Zev Leff.

Sheldon has been very upfront with us, stating for example "I am 17 and struggling as a gay teenager. I really want to change and I try to make the inappropriate gay thoughts I have disappear, but it's hard. I really want to marry a girl who I'll love and have children with her. I need help!" Or in another comment he said, "It's getting to the point where I'm losing touch with my Orthodoxy. I'm very God fearing and I think that's the only thing keeping me Orthodox right now. I feel like I'm living a nightmare and I just want to get rid of it."

So, in my judgment as a professional in the field, I believe this is an appropriate time for us to work directly with him. I know he is now in Israel and will be returning Wednesday. Sheldon has asked us to recommend a counselor that could work with him to enhance his own sense of self-worth, self-confidence, and self-esteem, all of which will help alleviate his sexual confusion. We are happy to do so. However, because he is only 17, our internal regulations require us to gain permission from a parent for those under 18. Sheldon said that he has

spoken to you about his issues and therefore suggested I can email you to confirm parental consent for counseling.

I would be happy to speak either with you or your husband (or both) about the issue and to explain the process of overcoming. Frankly, you are most fortunate that Sheldon desires help at this age since it is far easier to deal with the issues at 17 than at 27, 37 or whatever.

Please feel free to call me at home if you wish at 201 434 6629, or on my cell 917 929 0087 to discuss. Many thanks.

Best wishes,
Arthur Goldberg, co-director, JONAH

Exhibit 70

Message

From: jonahhelp@aol.com [jonahhelp@aol.com]
Sent: 7/18/2007 12:26:42 AM
To: jamescparker@btinternet.com
BCC: EJSBTB@aol.com
Subject: Re: Are you interested in a coaching assignment?

James,

G-d bless you. You must be exhausted. I guess a little rest in Iceland in about 5-6 weeks from now may help. I sent you a response about our itenary there a few hours ago. Also, FYI, it is possible that Paul Miller and his wife may join us. If David Olafson is able to set up any meetings for me while there, I would LOVE to have you with me. I frankly don't know whether he will be able to set up any meetings but he said he would try.

As to the fee/contribution question you raised relevant to the man in Manchester, (assuming I can deliver him or anyone else in fact), I would love to receive as much as possible. However, to be realistic, I would suggest a minimum of 10% and a maximum of no more than 30% to 40%; however I suspect that the proper number is probably much more on the lower end unless we are able to start generating a significant number of clients in the UK. If we can increase the number of clients over time and keep you busy close to full time, then I guess it would be logical to gradually increase the percentage from the lower end. Does that make sense? If not, feel free to give me an alternative suggestion. Honestly, I am totally open how to best structure it and what the numbers ought to be.

Also, hopefully I will be getting back to the Manchester guy before the end of the week to see if I can indeed deliver him.

Looking forward to your response.

Best,
Arthur

-----Original Message-----

From: JAMES PARKER <jamescparker@btinternet.com>
To: Jonahhelp@aol.com
Sent: Tue, 17 Jul 2007 9:08 am
Subject: Re: Are you interested in a coaching assignment?
Hi Arthur

I am just back from leading two awesome weekends for 250 men in the North and South of England. I picked up your phone message late Sunday evening and to be honest with you couldn't bear answering my phone yesterday - a rare thing for me. Then again, I didn't get out of bed until gone 2pm - also VERY rare for me!!

I would be most interested in helping out the gentleman in Manchester. As for what to charge, I have not had the chance to really think about this. What percentage would JONAH like to take/need to take/normally take in these circumstances? A pointer in the right direction would be helpful, brother! This would help me to decide a concrete price.

As for Iceland, Nicole seems very keen to do this as would I. Can you please remind of the dates and let me know what, if anything, you had planned regarding how you would spend your time there? I would be more than happy to help you with giving a seminar (or three!) to Icelanders. The more we get the word out, the better...

I will do my best to call you in the next 48 hours.

Every blessing

James

Jonahhelp@aol.com wrote:

Hi James,

I received a phone call on Friday from a struggler in Manchester. He is 37 years old, married, with a few kids, and is a "sofer" (that means his job is hand-writing the holy Torah scrolls). It is a job for which a great deal of religious training is required. He is therefore very religiously observant. He is also suffering from SSA.

Personality wise, he appeared reticent in our phone call, was very nervous about revealing anything (but did so after I did my thing), and is very concerned about anything leaking to the Jewish community in which he is a part because those who wrote Torah scrolls are supposed to be model pillars of the community. (In fact, when he gets SSA thoughts or acts out, he explained how guilty he feels and thus does not touch the holy scrolls. Thus, it is directly affecting his job performance). He was recommended to us by a Rabbi in Israel whom he consulted about getting help.

He is willing to use a therapist or coach and asked me to recommend one. In thinking about who I should recommend and of our conversations when you were here in the USA, I thought I should first offer you the opportunity to do so. After mentioning it to Alan, he thought it would be a great way for you to get started on your private career as a social entrepreneur (and not to run the efforts through Living Waters or any of your other present positions).

Would you like to privately coach him as a JONAH Institute for Gender Affirming Processes authorized representative and to charge him a fee for same? If so, what is a fair number for us to charge in the UK? We obviously would need to work out between us how much you charge the man and how JONAH would be compensated.

Anyway, please advise whether you are interested or not as soon as you can. I am expecting him to call me back on Monday or Tuesday my time. Also, please give me some idea of appropriate charges.

On another topic, have you and Nicole discussed whether you wish to vacation in September for a few days in Iceland when Jane and I are there? Please let me know. We are now in the process of making hotel reservations. Also, I have spoken with Redacted, a JiM graduate who I know and who lives in Iceland. He is excited about reuniting with Jane and me and also to meet you and Nicole if you decide to come. So, let me know your thoughts as soon as you can. Apparently, in Iceland, there is little if any organized SSA recovery efforts. Along these lines, I have asked Redacted to set up a meeting or two for me to help educate either strugglers, clergy, or whoever he thinks it would be useful for me to meet and chat about our favorite topic. He was favorably inclined to do so.

Very best wishes,

Arthur

Get a sneak peak of the all-new AOL.com.

AOL now offers free email to everyone. Find out more about what's free from AOL at [AOL.com](https://www.aol.com).

Exhibit 71

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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-5473-12

-----x
One Liberty Plaza
New York, New York

February 18, 2014
9:31 a.m.

DEPOSITION of ARTHUR GOLDBERG, as
corporate representative, taken pursuant to
Notice, taken by Fran Insley, a Notary Public
of the States of New York and New Jersey.

ELLEN GRAUER COURT REPORTING CO. LLC
126 East 56th Street, Fifth Floor
New York, New York 10022
212-750-6434
REF: 106347A

1 GOLDBERG

2 out of here, if I can.

3 MR. MC COY: We will still have the
4 full afternoon regardless.

5 Q. What are the services that JONAH
6 offers?

7 A. Primarily referral to counselors.
8 We actually have a list. One of the things on
9 our website, we actually have a list of that.
10 Bibliotherapy, we recommend books to people.
11 We recommend counselors. We recommend
12 websites. I'm sure you've seen it. It's on
13 our website.

14 Q. Does JONAH provide counseling
15 itself?

16 A. No.

17 Q. Why not?

18 A. Because we are not counselors.

19 Q. You stated that some of the
20 counselors to whom JONAH refers clients have
21 themselves overcome issues with homosexuality?

22 A. That is correct.

23 Q. What is the terminology that you
24 prefer to use?

25 A. I would say grow out of

1 GOLDBERG

2 Q. And when PCC is the sole sponsor of
3 a JiM weekend and you or JONAH counselors
4 participate, what is the financial arrangement?

5 A. We pay a staff fee and we pay our
6 own transportation.

7 Q. When you say we pay a staff fee, do
8 you mean you pay PCC a fee in order to
9 participate as staff?

10 A. Yes, that is correct.

11 Q. When you refer JONAH clients to
12 Journey into Manhood weekends, do you get a
13 referral fee?

14 A. No, absolutely not.

15 Q. Never?

16 A. Never.

17 Q. Why not?

18 A. Because that's not their policy.
19 Why not is because they are doing the same kind
20 of good work that we are doing, that we believe
21 they are doing, and we believe that they are --
22 I don't like to duplicate work, so if they are
23 doing a good weekend why should I create our
24 own weekend? So, fine.

25 Q. You do sometimes collect referral

1 GOLDBERG

2 fees, right?

3 A. Mainly only from counselors.

4 Q. Why?

5 A. Because we need to survive as an
6 organization.

7 Q. So the pure donations that JONAH
8 receives, the charitable donations, aren't
9 enough for JONAH's costs?

10 A. Correct.

11 Q. And the reason that you seek
12 referral fees from counselors in some cases is
13 to make up the remainder?

14 A. Correct.

15 Q. I believe that you earlier mentioned
16 ABEO as an organization that JONAH has worked
17 with in the past?

18 A. ABEO, yes.

19 Q. And JONAH no longer works with it?

20 A. I don't know if they even exist
21 because, as I told you before, that Paul
22 basically withdrew from doing the work. He was
23 intimidated by the activist journalist who
24 masqueraded as a client.

25 Q. Are there any other organizations

Exhibit 72

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CIVIL PART
HUDSON COUNTY
DOCKET NO. HUD-L-5473-12
APP. DIV. NO. _____

MICHAEL FERGUSON, et al.,	:	
	:	TRANSCRIPT
Plaintiffs,	:	
vs.	:	OF
	:	
JONAH, ARTHUR GOLDBERG, ALAN	:	TRIAL
DOWNING and ALAN DOWNING LIFE	:	
COACHING, L.L.C.,	:	
	:	
Defendants.	:	

Place: Hudson County Superior Court
Administration Building
595 Newark Avenue
Jersey City, N.J. 07306

Date: June 8, 2015
Volume 1 of 2
Pages 1 - 200

B E F O R E:

HONORABLE PETER F. BARISO, JR., A.J.S.C.,
And a Jury.

TRANSCRIPT ORDERED BY:

JODI ERICKSON, ESQ.,
(Cleary, Gottlieb, Steen & Hamilton, L.L.P.)

Audio Recorded by: C. Ortiz

////////////////////////////////////

METRO TRANSCRIPTS, L.L.C.

Mary Nelson

316 Ann Street
Randolph, New Jersey 07869
(973) 659-9494

////////////////////////////////////

1 JONAH Institute has never performed any original
2 scientific research, right?
3 A Well I wrote the book in, in 19 -- from 2002 to --
4 2003 to 2007 or '08. So that would be a major work of
5 research that I believe was done.
6 Q Okay. Your book is the research performed by
7 the JONAH Institute.
8 A That is the research that we have, that we have
9 published. We actually tried to do some other stuff,
10 but you know, none of it has been published yet.
11 Q And the JONAH Institute doesn't say it
12 conducts surveys of JONAH clients, right?
13 A No, it doesn't say that.
14 Q And in fact it doesn't it doesn't collect any
15 data of any kind of JONAH's clients, right?
16 A That is correct. We do not have the formal
17 training. We're a mom and pop shop. We really have,
18 you know, par -- I work for free. Elaine works for
19 free --
20 Q So the answer is no?
21 A The answer is no.
22 Q Let's turn to the full service clinic. You
23 just said that the JONAH Institute doesn't employ
24 anyone. That, that includes counselors, right? It
25 doesn't employ any counselors.

1 A That is correct. It does not employ counselors.
2 Q In fact the JONAH Institute only offers one
3 service, right, referrals?
4 A JONAH Institute actually does do -- well as I
5 said, I did the -- I did research for the book. And
6 when it says "clinical" we're referring to the
7 referrals that we give out to various people.
8 Q Right. The referrals that you make when
9 people call JONAH.
10 A To, to clinicians. We refer people to clinicians.
11 Q Thank you.
12 MS. BENSMAN: You can put that away.
13 Q Now it takes money to run a worldwide
14 institute, right?
15 A That is correct.
16 Q One of the ways that JONAH raises money is
17 that many of the counselors to whom JONAH refers
18 clients give JONAH a cut of the counselor's fees,
19 right?
20 A That is correct.
21 Q And you negotiate what percentage that will
22 be with the counselors, right?
23 A That is correct.
24 Q If you're able to deliver a client you may
25 suggest that perhaps between 10 and 40 percent of the

Exhibit 73

Message

From: Jonahhelp@aol.com [Jonahhelp@aol.com]
Sent: 6/4/2008 11:23:26 PM
To: Redacted
Subject: Re: Policies

I look forward to chatting.

Best,
 Arthur

In a message dated 6/4/2008 4:01:54 P.M. Eastern Daylight Time, Redacted writes:
 Okay. I'll call you soon...

On 6/3/08, Jonahhelp@aol.com <Jonahhelp@aol.com> wrote:

It may be possible. We should talk. Also, I will also need to speak with your brother. Can you call me?

Thanks,

Arthur

PS--home office # 201 434 6629, cell # 917 929 0087.

In a message dated 6/2/2008 7:18:31 P.M. Eastern Daylight Time, Redacted writes:

So have you asked about my brother signing for me? Please let me know soon. Thanks!

On Thu, May 29, 2008 at 9:51 PM, Redacted wrote:

Noooo. I'm saying that there are **rabbonim** who hold that you are born gay and that it's a nisayon. gay activists are nothing more in my mind than animals with mouths- they believe what they want and whatever feels good for them. i'm talking about rabbonim- how do you reconcile with that?

On Thu, May 29, 2008 at 9:02 PM, <Jonahhelp@aol.com> wrote:

In a message dated 5/29/2008 11:52:26 P.M. Eastern Daylight Time, Redacted writes:

Okay well thank you so much. I'm happy that I'm getting down to deal with the problem. But first I actually have to talk to my brother about it, which I'll probably do after Shabbat is over. I don't want him to be churning it over on Shabbat and be stressed out. Plus he's learning in New York so I'll have to find a time to talk to him.

And also, I've heard from some people that reparative therapy sometimes doesn't work and can even be damaging...?

And then I've heard of rabbonim who say that homosexuality is something you *are* born with...?

Reparative therapy is not damaging and indeed is helpful. It works like most therapies. Thousands of people have healed thru the process.

As to being born that way, a total falsity propagated by gay activists. Read our website or article by Neal Whitehead (google him). Homosexuality is an emotional adaptation to childhood pain. Nothing more, nothing less.

I hope the above is clear. I would be happy to discuss these issues with you but I am about to go to sleep.

Best,
 Arthur Goldberg

Get trade secrets for amazing burgers. [Watch "Cooking with Tyler Florence" on AOL Food.](#)

Exhibit 74

[No Subject]

From:

Redacted

To:

info@jonahweb.org

Date:

Mon, 21 May 2018 13:45:36 +0000

I am living in eretz Israel in Jerusalem and I am interested to get help for myself and my daughter 23yrs old who joined the Gay about 4 years ago. We are orthodox jews I got to know your web through the book or A .Goldberg. We are desperate for help but we did'nget any i Eretz Israel. My daughter speaks hebrew better than english.

Thank you for answering this mail. Very pained parents...

N.b it is not yom tov for us to-day

Exhibit 75

Re: DC Group on Homosexuality--Monday, June 12, 2017

From: Arthur Goldberg <jonahhelp@aol.com>

To:

Redacted

Date: Thu, 08 Jun 2017 17:30:53 +0000

A better and more direct email for me is "jonahhelp@aol.com" (although I can still receive the "info@jonahweb.org".)

Concerning agenda items, I'd like to have a general discussion about religious liberty issues, particularly if anyone in the group knows whether the Justice Dept is moving forward (as per the EO) on religious liberty issues to protect the florists, bakers etc. Also, what else is happening at the fed govt level to protect those who adhere to the Judeo-Christian worldview.

Thanks
Arthur

-----Original Message-----

From: Peter Sprigg: **Redacted**

To: **Redacted**

Redacted

Sent: Thu, Jun 8, 2017 12:10 pm
Subject: DC Group on Homosexuality--Monday, June 12, 2017

Final reminder—please send me an email RSVP to let me know if you will be attending the next meeting of the DC Group on Homosexuality.

Please also send any items you would like to have on the agenda.

Date:
Monday, June 12, 2017

Location:
Family Research Council
801 G Street NW
Washington, DC 20001

Time:
10:00 a.m. to 4:00 p.m.

Peter Sprigg
Senior Fellow for Policy Studies
Family Research Council

Redacted

P.S.—I have adjusted the email mailing list based on a couple responses to my email last week. If you are receiving this at an email you would prefer not to use for this purpose, let me know which email address to remove and what email address you would prefer to use for this list.

Exhibit 76

Message

From: Rich Wyler [richwyler@gmail.com]
on behalf of Rich Wyler [rich@peoplecanchange.com]
Sent: 4/27/2009 1:59:42 PM
To: jonahhelp@aol.com
Subject: RE: Arthur, can you help us spread the word about "A Wife's Healing Journey"?
Attachments: image001.jpg; image002.jpg

Arthur, thank you so much!

I wonder, do think there is a way for us to get a mailing list of the attendees to send them brochures about JiM? Do you think that is something you could ask (better to come from you than from me)?

About having a fluent Hebrew speaker on staff in England in October, I wouldn't think that would be difficult to get. I'd like to plan on it.

Thanks for all you do!

Rich



Rich Wyler

Executive Director

People Can Change

www.peoplecanchange.com

P.O. Box 412

Ruckersville, Virginia (VA) USA 22968

1-434-985-8551

From: jonahhelp@aol.com [mailto:jonahhelp@aol.com]
Sent: Sunday, April 26, 2009 3:34 PM
To: rich@peoplecanchange.com
Subject: Re: Arthur, can you help us spread the word about "A Wife's Healing Journey"?

Rich,

Happy to help. We will try to spread the word. Certainly those in Mary Jane's class should provide a small base of registrants (hopefully). I will check our records to determine other potential women registrants.

I am in London, staying at Ian's and thought you would be pleased to learn that several volunteers from Europe got together today at Ian's to talk about how to spread the word. I was here on a seminar where I shared the speaker's platform with Joe Nicolosi and Jeff Satinover. About 100 plus people were in attendance at the 2 day event, sponsored by the Anglican Mainstream. Several JiM guys were in attendance and of course I mentioned PCC and JiM several times during my two days of speeches, I was surprised how few other guys outside of JiM grads were aware of the programs. (I did receive several questions about it in private conversations and since Paul Miller brought over several pamphlets, I put a number of them in my suit jacket so I could hand them out whenever I was approached about what I had said.)

One of my counselors (Mordechai Klein who is a native Hebrew speaker and a licensed MSW) has recommended a JONAH guy living in Belgium to sign up for JiM London. Obviously I do my usual pushing to get any JONAH based client to do the program. It is an essential part of our therapy program--almost a requirement that they attend a JiM if they function within our "gender affirming process". Anyway, the question I have is language. The client is a native Hebrew speaker (from Israel) and is also fluent in French (he teaches in Belgium, thankfully not in Flemish). Do you expect we will have someone on staff really fluent in either Hebrew or French? Are you thinking of inviting an Israeli guy to staff? As to French, I know Alan Downing is fairly fluent in French and so is Ian but I wonder how deep their fluency is. I believe Stephen Jouix from Switzerland who previously was supposed to staff (or maybe did, I am not sure) is French fluent native. (FYI, Stephen is one of the **non-Jewish** JONAH guys --- I **assume you know** we have many non-Jewish guys in one or another aspects of our programs.) Any way, the client's (first name Gavariel) English is pretty terrible (I have spoken with him several times on the phone. He grasps the very basics but that is it.) I told the counselor to get him to register because I assumed we would have a Hebrew or French speaker there; however, I would like to know that my advice was correct. I do want him to fully understand what is going on. Please advise!!

Hope you are well.

Very best wishes,
Arthur

-----Original Message-----

From: Rich Wyler <rich@peoplecanchange.com>

To: Jonahhelp@aol.com; 'Arthur Goldberg' <jonahoffice@gmail.com>

Sent: Sun, 26 Apr 2009 1:26

Subject: Arthur, can you help us spread the word about "A Wife's Healing Journey"?

Arthur, can you help us distribute this? Do you have email addresses for women who might be appropriate and ready for it? If so, please pass it on!

Thanks!

Rich



A WIFE'S HEALING JOURNEY

5 pm **Friday, June 5** through 2 pm **Sunday, June 7**
north of **Houston, Texas**

\$400

Fee includes 2 nights stay at the retreat center and all meals

For the first time, People can Change is offering an **experiential weekend for wives of men who are working to resolve unwanted same-sex attraction (ssa).**

This powerful weekend retreat is **designed for women who are committed to their marriage and to**

their own personal growth. It's not about "*fixing HIM*"; it's about inviting growth and peace within yourself, while choosing to stay and grow in a marriage that is very much a work in progress.

"A Wife's Healing Journey" is staffed by women and men whose marriages have survived and even (ultimately) thrived as the husband worked through his ssa and the couple, together, worked towards a more rewarding and intimate relationship as husband and wife.

Experiential in nature, this weekend retreat addresses many of the hurtful issues associated with being married to someone struggling with unwanted ssa, and it offers a healing path to deal with them.

The weekend is designed to:

- Engender hope for personal and marital healing
- Honor your anger and make it work for you
- Claim help for getting your needs met
- Work through sadness to a place of loving
- Foster belief in the change process with compassion
- Develop clearer boundaries for greater closeness
- Surrender the rest to a Higher Power or Greater Purpose

To register: <http://peoplecanchange.com/wifehealingjourney.htm>

For further information contact:

Mary Jane Morgan 713-480-3948 maryjanem4@comcast.net
or Rich Wyler 434-985-8551 rich@peoplecanchange.com

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