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1 THE COURT: Okay. All right.

2 MS. EDELSTEIN: And especially a religious Jew.

3 THE COURT: All right. I'll give you a little bit of
4 leeway, but let's not go on and on.

5 MS. EDELSTEIN: Sure. Thank you.

6 THE COURT: Okay.

7 (CONCLUSION OF SIDEBAR CONFERENCE)

8 THE COURT: Go ahead, Kim.

9 MS. EDELSTEIN: Thank you, Your Honor.

10 Q. Could you please give me an answer with regards to whether
11 you have any kind of construct in your religion as to where
12 the soul joins God in heaven?

13 A. The Apostle Paul wrote that to be absent from the body is
14 to be present with the Lord. In terms of how you define that,
15 where that is, I believe that there is a separate spiritual
16 world called heaven, and I really don't know how better to
17 explain it than that.

18 Q. Okay. Thank you. And the concept of hell from your
19 religious perspective, sir?

20 A. Jesus's teachings were very clear that that's a literal
21 place. He referenced fire and brimstone several different
22 times, and it is a place of torment. It is a place of
23 banishing folks who have not had their sins forgiven.

24 Q. Okay. And according to your religion, sins are only
25 forgiven if you accept Jesus as your savior; is that correct?

1 A. That is correct.

2 Q. Is there no other way to have your sins washed or
3 cleansed?

4 A. No. I think I've said that a couple of times.

5 Q. Okay. All right. Under your religious doctrine, do you
6 proselytize?

7 A. Define "proselytize."

8 Q. Do you attempt to convert other religions to Christianity
9 or do you do mission work?

10 A. If I get opportunities, if God opens up a door for me to
11 talk to somebody about accepting Jesus Christ, I do my best to
12 try to share the Gospel, yes.

13 Q. Okay. Do you consider that a duty under your religious --
14 is that an order or a duty for you to do that?

15 A. I think it's an expectation that God has of us. End of
16 Matthew and Mark, Matthew 28 and Mark 16, it's called The
17 Great Commission, tells us to go out into the world, preach
18 the Gospel, teach the nations, baptizing them in his name. I
19 also, quite frankly, if I -- you know, if that's my belief
20 system, I want people to go to heaven. I don't want them to
21 go to hell. So I want to try to tell them, hey, look, you
22 know, this is the relationship you can have with God.

23 Q. So you consider that an obligation or a duty under your
24 religion?

25 A. It's both an obligation and a concern for fellow man.

1 Q. Okay. Do you consider it a command from God?

2 A. Yes.

3 Q. Okay. And do you have any kind of reference point for
4 that command from the Bible?

5 A. Matthew 28 and Mark 16.

6 Q. So it's more than just a duty or obligation; you consider
7 it a command from God?

8 A. I'm -- at this point, you're confusing me because I don't
9 know how you separate command from God from duty or
10 obligation. Who else would my duty or obligation be to?
11 That's where you're confusing. The question is tripping me
12 up.

13 Q. I see. So I apologize. So am I correct if I were to say
14 that you believe the person you answer to is God?

15 A. Solely.

16 Q. Solely. Okay. Thank you. Have you ever engaged in
17 mission work?

18 A. Not formalized mission work for a thing most people think
19 of as people raising money and going overseas and so forth.
20 But frequently when we have visitation programs Thursday
21 nights during the spring and summertime, yeah, I'll go knock
22 on doors and I'll ask people if I can talk to them about Jesus
23 Christ. Some people say yes. Some people say no. If they
24 say no, I say "Have a good night" and I go on.

25 Q. This command from God to proselytize other persons that

1 are not Christian yet have not accepted Jesus Christ, is this
2 a command that's uniform across all congregants of your church
3 or --

4 A. It's a Biblical command. How other people, other
5 congregants view it, that's -- you're asking me to speculate
6 on how somebody else interprets that.

7 Q. Fair enough. So let me ask you, does the church that
8 you're involved in have a mission segment of the church that
9 goes out and does mission work?

10 A. We support probably 30 or 40 world missionaries, so that's
11 part of our mission work. And then yes, we have an organized
12 program, like I said, spring, summertime, early fall. Every
13 Thursday night, we go out and we knock on doors. We usually
14 knock on about 25,000 houses a year. And then in wintertime
15 when it's too cold for that, we will get in our cars, we'll go
16 visit people that are new to the area, and we'll just say,
17 hey, you know, there's a church in town, if you want to come
18 out, love to have you come out.

19 So yes, we actively engaged year-round in trying to tell
20 people how they can have a relationship with God.

21 Q. Does your church then keep a roster of the houses you
22 visited to see how successful you've been or unsuccessful in
23 bringing people into the fold?

24 A. No. The way it is -- our pastor used to be an engineer
25 before he became a pastor, and he is very meticulous about

1 taking the surrounding segments near our church, whether it be
2 West Chester, Fairfield Township, Liberty Township, Fairfield
3 city, certain parts of Hamilton, he will get those addresses
4 and he maps out a strategy. Basically, we show up on a
5 Thursday night. Say there's ten adults there -- because
6 teenagers do a separate ministry. That's why I said adults.
7 Ten of us show up. We'll take a neighborhood. We'll go and
8 we'll witness and knock on doors and we -- you know, he does
9 keep track of us doing the neighborhoods. There is no
10 statistical bookkeeping for successes or wins, losses,
11 anything like that, no.

12 THE COURT: Kim, I think we're getting a little far
13 afield.

14 MS. EDELSTEIN: Okay.

15 Q. I was going to ask if you target neighborhoods that are
16 Muslim- or Jewish-heavily-populated.

17 A. We just have a plat of land, and whoever happens to live
18 in the houses, we knock on the door. We don't know who lives
19 there.

20 Q. Okay. Is it your belief that Christianity is the only way
21 to have a relationship with God? Is that a fair statement?

22 A. I think it's a fair characterization of what I have said
23 two or three times, yes.

24 Q. Okay. Do you subscribe, like some Christians do, that God
25 has designated the Jews as the chosen people?

1 A. Oh, absolutely.

2 Q. Okay. And how do you understand that concept to mean?

3 What does that word "chosen people" mean?

4 A. Well, this is going to get into a lengthy discussion, but
5 that's okay. The covenant going back to Abraham, that's the
6 line that the Jewish faith stems from. Abraham had a very
7 special relationship with God. It was Abraham's belief and
8 his faith that was counted for righteousness. As a result of
9 that, God made certain covenants with Abraham, and those
10 covenants passed through the nation of Israel.

11 That covenant then went through Abraham's son Isaac, went
12 through further with Isaac's son Jacob, and then, of course,
13 his twelve sons forming the twelve tribes of Israel.

14 In terms of summarizing the covenant as a whole, as I
15 understand it -- I don't claim to be an expert on Judaism, but
16 in terms of my understanding and in terms of how the Old
17 Testament lays out the covenants, the nation of Israel are the
18 people, through the relationship God had with Abraham, that he
19 would watch out for, he would protect. They were his people
20 and he was their God.

21 I mean, he was the one visiting Moses, gave him the very
22 special name. When Moses said "Who shall I tell them sent
23 me?" when it came to leading the nation of Israel, bondage
24 from Egypt, he said, "Tell them I AM sent you." That was a
25 very personalized name between God, who also is known as

1 Jehovah and Elohim and Adonai and Yaweh and so forth. That
2 was a very personal name that connected his relationship to
3 them as a people.

4 And through that, of course, you get the Mosaic Law and
5 you get, you know, in terms of them crossing over and getting
6 to the promised land, and the entire history of that from
7 going there to all the way to the captivities, nation of
8 Israel being taken captive, I believe, in seven-something BC,
9 and Judah being taken captive in five-something BC. Because
10 by this time Israel had split into two different nations.

11 Q. Let me ask you then, if the Jews were designated the
12 chosen people, do you view that as a special relationship they
13 have with God?

14 A. It is a special relationship with God that they have as a
15 people, as a nationality, yes.

16 Q. Okay. But under your religious beliefs, is it not that
17 the covenant between the Jewish people and Abraham has been
18 broken at some point?

19 A. No.

20 Q. Okay. Then if the Jews are the chosen people of Israel
21 and the covenant hasn't been broken, then why must they accept
22 Jesus Christ as their savior to achieve heaven?

23 MS. WOEBER: Objection, Your Honor. He's testified
24 as to his beliefs. Now we're getting into argument.

25 THE COURT: Well, I'm not sure.

1 If you understand the question, you can answer.

2 THE WITNESS: I do.

3 A. The covenant with Abraham could never be broken because
4 God cannot break covenants. God is always faithful. However,
5 under the Mosaic Law, there had to be periodic sacrifices to
6 atone for the sin of the people of the nation of Israel. That
7 has never changed. The only thing that has changed is the
8 fact that that no longer has to be done. Jesus was the
9 finalized sacrifice. Hebrews discusses him as being the
10 perfect sacrifice, also discusses him as being the final high
11 priest, the high priest who did not have to offer a sacrifice
12 for his own sins, which is what the whole law of Moses lacked.

13 Christ did not -- as a matter of fact, as he, himself,
14 said, he did not come to usurp the law of Moses; he came to
15 fulfill the law of Moses. The covenants are fulfilled through
16 the coming of the Messiah being Jesus Christ, so there's no
17 inconsistencies whatsoever.

18 Q. Okay. But do you have an understanding that from a Jewish
19 faith perspective the Messiah has not occurred yet?

20 A. I understand that the primary difference between
21 Christianity and Judaism, because we do share the same God, we
22 do recognize the same historical and spiritual significances
23 of the Old Testament and God's relationship with Israel, the
24 primary difference, as I understand it, is that practitioners
25 of Judaism are still awaiting Messiah. Christians believe

1 Messiah has already come.

2 Q. So then if the Jews are still waiting the Messiah, asking
3 them to accept someone as the Messiah is contrary to their
4 religion; is that not correct?

5 A. Yes.

6 Q. Okay. So let me ask you, you had indicated that you
7 believe that your religion was an accurate religion; is that
8 correct?

9 A. Are you asking me --

10 Q. It is the religion to achieve heaven?

11 A. I believe it to be true or else I wouldn't believe it,
12 yes.

13 Q. Okay. So then if Jews don't accept Jesus as their
14 Messiah, then they can never achieve heaven?

15 A. Nobody can go to heaven if they have not accepted the
16 forgiveness of Jesus.

17 Q. Okay. So what occurs, in your understanding of your
18 faith, to a Jewish soul when they pass away if they have not
19 achieved salvation or accepted Jesus Christ?

20 A. Any soul, Jew or gentile, if your sins have not been
21 forgiven, you are eternally separated from God.

22 Q. And that means to you sent to hell?

23 A. That's what it means in the Bible. Yes.

24 Q. Okay. And you have indicated previously that it's to a
25 particular place in hell, like the lake of fire; is that

1 accurate?

2 A. Well, you're getting into more the Book of Revelation.
3 After you have the seven-year tribulation period, you have a
4 new heaven, you have a new earth. It does reference hell
5 being cast into a lake of fire. That's at the very, very end
6 of prophetic times getting into then the beginning of
7 eternity.

8 Q. So is that a soul that's damned as one that is sent to
9 hell? Is that a damned soul?

10 A. If that's the term you wish to use for it. I never refer
11 to anybody being, quote, "damned." If someone dies and they
12 end up going to hell because they didn't have a relationship
13 with God, you might call them a lost soul. Don't call them a
14 damned soul. I don't think I've ever used the word "damned"
15 in connection to a person.

16 Q. So it is a lost soul according to your religious
17 practices?

18 A. Best way of putting it, yes.

19 Q. Okay. Is there any particular thoughts you have when you
20 are doing mission work and someone refuses to accept what you
21 are telling them? Do you have any kind of feelings towards
22 them? Do you feel sorry for them? Do you -- are you angry
23 about that?

24 A. My feelings, because unfortunately it happens far more
25 frequently that somebody will reject what I'm talking to them

1 about, that's between them and God. My job is to present what
2 God wants me to present. Everybody is responsible for their
3 own decision, their own choice. I don't think anything bad
4 about that person. Does it make me sad? Sure. I mean, I'd
5 like to see everybody accept and go to heaven and so forth.
6 But, I mean, I have tons of friends that don't know Christ as
7 their savior and I don't -- we're able to enjoy good, friendly
8 relations. I don't hold it against them because, quite
9 frankly, that decision is between them and God.

10 Q. Okay. Do you have any friends who are Orthodox Jews?

11 A. I do not know.

12 Q. Do you have any Jewish friends?

13 A. I -- well, first of all, I don't have many friends at all.
14 I'm going to put that one on myself. I'm not a social type of
15 person. Maybe two or three friends at best and I -- you know,
16 my magistrate is a Jewish. A friend of mine who is currently
17 a Juvenile Court judge, Dan Phillips, he's Jewish. Whether
18 they are Orthodox, how much they practice, whether they
19 practice, we don't discuss those types of things. Religion is
20 not that type of a -- I know they are not practicing
21 Christians. And that's okay. That's between them and God. I
22 don't know what the rest of their religious practices are
23 because we don't talk about that stuff.

24 Q. Okay. Well, let me ask you then, are you aware that to an
25 observant Jew, that asking an observant Jew to accept Jesus

1 Christ as the Messiah or to read the New Testament is, from a
2 Jewish perspective, blasphemy? Are you aware of that?

3 MS. WOEBER: Objection to form.

4 THE COURT: Yeah. We're getting kind of far afield.
5 Sustained.

6 MS. EDELSTEIN: Okay. I'm going to pull up an
7 exhibit here for the judge to look at briefly.

8 THE COURT: Witness only, Krista.

9 MS. EDELSTEIN: Are you able to see page 158, sir?

10 THE WITNESS: No.

11 THE COURT: No. Nothing yet is up.

12 MS. EDELSTEIN: I apologize. That was my fault.

13 THE WITNESS: All right. I see it.

14 Q. You were asked if you hold the belief that --

15 THE COURT: Hang on. Hang on.

16 Q. -- an unrighteous person would be consigned --

17 THE COURT: Hang on, Kim. This is not in evidence,
18 so frame the question appropriately.

19 MS. EDELSTEIN: Okay. I will.

20 Q. Could you please read line seven to 18 to yourself?

21 A. Okay. (Reading)

22 Q. Do you recall making the statement?

23 THE COURT: No. Okay, go ahead. Don't read the
24 statement, but if you recall making it.

25 A. I recall making the statement at that time. I recall

1 making a statement about two minutes ago because it's pretty
2 much what I just said.

3 Q. All right. So you still hold that belief then?

4 A. Miss Edelstein, I apologize. I -- it's basically what I
5 just said almost verbatim literally three minutes ago. Are
6 you asking me if there is an inconsistency? I don't
7 understand the nature of your question.

8 Q. Do you still hold this belief that's stated here in this
9 answer? I'm not going to read it.

10 THE COURT: I think he's just answered.

11 MS. EDELSTEIN: Okay. That was the clarifying
12 question. Just one moment. Let me move on to another topic.
13 Just a moment.

14 THE WITNESS: I did have a clarification. You asked
15 earlier if I was friends with any observant Jews?

16 MS. EDELSTEIN: Yes.

17 THE WITNESS: I actually did fail to point out, Jesus
18 himself actually was an observant Jew.

19 MS. EDELSTEIN: Okay. So do you consider your
20 relationship with Jesus to be a friendship, a relationship?

21 THE WITNESS: Oh, absolutely.

22 MS. EDELSTEIN: Okay.

23 THE WITNESS: He kept every law, he kept every
24 Passover, every feast.

25 Q. I'm going to turn for a moment to the termination that