

1 I would have had my assistant do that.

2 Q. You worked with the file for eight months, though.

3 A. Uh-huh.

4 Q. You have no sense of how much communication there
5 was back and forth?

6 A. A lot of our communication was by e-mail and phone.
7 Mostly by phone. So I doubt if there was a lot,
8 but I don't know for sure. It was four years ago.

9 **Q. Did Harvest House maintain a fact-checking file for**
10 **the Encyclopedia of Cults and New Religions?**

11 **A. No.**

12 **Q. Now, am I correct that fact checking for this book**
13 **was done outside of Harvest House?**

14 **A. The fact checking is the author's responsibility.**

15 **Q. Does Harvest House employ fact checkers?**

16 **A. We employ editors. Occasionally they may check**
17 **some primary source, but we don't check primary**
18 **sources as a rule.**

19 **Q. I'm going to come back to that. I want to go**
20 **forward with the issues on the documents.**

21 When you helped Harvest House respond to the
22 request for documents, did you search your computer
23 files?

24 A. Yes.

25 Q. And are you aware that Harvest House had an