

- 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