

1 A. Drug Free America Foundation.

2 Q. Anything else?

3 A. And SOS.

4 Q. What is that?

5 A. Save Our Society.

6 Q. Is that a drug related --

7 A. Yes, it is.

8 Q. Okay. Anything else?

9 A. No.

10 Q. Okay.

11 A. Well, excuse me, yes.

12 Q. What is it?

13 A. The Holocaust Museum and the Nora Manner.

14 Q. Holocaust Museum here in St. Pete?

15 A. That's correct.

16 Q. Have you ever -- did you ever serve on any board
17 of directors at the Guggenheim Museum in Italy?

18 A. As an honorary member, yes.

19 Q. Did you know Mrs. Guggenheim at all?

20 A. No.

21 Q. Was it after she died that you were an honorary
22 member, if you know?

23 A. I assume so, yes.

24 Q. Okay. Do you have any backgrounds in art
25 history?

1 A. No.

2 Q. Do you know who Marcel Duchamp was?

3 A. No.

4 Q. Okay. I'm going to show you what we're going to
5 mark as Exhibit 1 for this deposition.

6 (THEREUPON, Exhibit No. 1 is marked for
7 identification.)

8 BY MR. MCGOWAN:

9 Q. I'm going to represent to you that Marcel is a
10 postmark of Guggenheim and he depicted this as art.

11 Have you ever seen that before?

12 A. No.

13 Q. Do you find it offensive?

14 A. I don't even know what it is.

15 Q. Okay. It's a urinal.

16 A. Yes. I find it offensive.

17 Q. Okay. Okay. Do you know that he did this in an
18 art museum exhibit in 1917 for the sole purpose of
19 shocking people saying that it should be art?

20 A. I've never heard of the man.

21 Q. Okay. Very good. Do you know whether or not
22 this was in Ms. Guggenheim's collection when you
23 served as an honorary board member?

24 A. I do not.

25 Q. Okay. Okay. Any other -- I think we've covered

1 all the boards you're on. I believe you also have
2 been involved in fund-raising chairman for Governor
3 Bush?

4 A. That is incorrect.

5 Q. Okay. I apologize. Tell me. Have you served
6 in any capacity as a fund-raiser, you know, official
7 fund-raiser for either Governor Bush or the Republican
8 Party?

9 A. No.

10 Q. Okay. When did you -- when was your posting
11 over?

12 MR. ENGLANDER: Excuse me. Her posting?

13 BY MR. MCGOWAN:

14 Q. Your husband's posting as ambassador?

15 A. July 24th, 2005.

16 MR. MCGOWAN: We'll mark this as Exhibit 2.

17 (THEREUPON, Exhibit No. 2 is marked for
18 identification.).

19 BY MR. MCGOWAN:

20 Q. I may not have an extra copy of this. This is
21 the complaint.

22 MR. ENGLANDER: Well, it's not the accurate
23 complaint.

24 MR. MCGOWAN: It's not?

25 MR. ENGLANDER: No. The complaint was amended

1 and supplemented.

2 MR. MCGOWAN: Let me see. I'll still mark it as
3 an exhibit. It was representing -- and I believe it's
4 correct.

5 BY MR. MCGOWAN:

6 Q. Nonetheless, what I'd like to do is ask you to
7 look at this and look at the back page for the
8 signatures.

9 MR. ENGLANDER: Just asking her to look at the
10 back page? May I see that?

11 MR. MCGOWAN: Of course.

12 MR. ENGLANDER: (Peruses the file.) You mean my
13 signature?

14 MR. MCGOWAN: That and then --

15 MR. ENGLANDER: So just show her those pages?

16 MR. MCGOWAN: Yes.

17 THE DEPONENT: All of this?

18 MR. MCGOWAN: Just the signatures.

19 BY MR. MCGOWAN:

20 Q. Do you recognize your signature on there?

21 A. I do.

22 Q. Okay. And do you recognize your husband's
23 signature?

24 A. I do.

25 Q. And then if you could flip to the next page,

1 there's a notary seal. Did you sign this in the
2 presence of the notary?

3 A. I did.

4 Q. And then I believe Mr. Englander's signature is
5 there as well?

6 A. I'm sorry?

7 Q. Mr. Englander appears to have signed that as
8 well?

9 A. Yes.

10 Q. Okay. Thank you. If you could just hand that
11 back for me. I want to go over a few things in this.

12 All right. Did you understand that you signed
13 this complaint under oath?

14 A. Yes, I do.

15 Q. All right. Paragraph 5 reads, "Beginning in
16 1987, Bradbury embarked on a campaign intended to
17 harass, embarrass and emotionally disturb the
18 Sembler's."

19 Tell me everything you know that he did in 1987
20 that was calculated to harass, embarrass and
21 emotionally disturb you.

22 A. In 1987?

23 Q. Yes, ma'am.

24 A. He demonstrated in front of my house.

25 Q. Okay. How many times?

1 A. I saw him once.

2 Q. Okay. Do you have any information that he
3 demonstrated more than one time in front of your
4 house?

5 A. I do not.

6 Q. Okay. And you were in the house when you saw
7 him demonstrating?

8 A. I was.

9 Q. Where was he when he was demonstrating?

10 A. He was across the street from my home.

11 Q. So he was not on your property?

12 A. No, he was not.

13 Q. Okay. And when he was demonstrating, what was
14 he doing? Was he screaming, shouting? Do you recall
15 what he was doing when you saw him?

16 A. No, I do not.

17 Q. Okay. I want to show you what we're going to
18 mark as Exhibit 3 and ask you if that looks familiar
19 to you at all.

20 (THEREUPON, Exhibit No. 3 is marked for
21 identification.)

22 THE DEPONENT: If this is what?

23 BY MR. MCGOWAN:

24 Q. Does that jog your memory as to what
25 Mr. Bradbury was doing when --

1 MR. ENGLANDER: Are you representing that that's
2 Mr. Bradbury?

3 MR. MCGOWAN: Yes, I am.

4 THE DEPONENT: Are you asking me if I remember
5 this picture?

6 BY MR. MCGOWAN:

7 Q. Well, does that look like the person who you
8 think was Mr. Bradbury demonstrating in front of your
9 house?

10 A. Yes.

11 Q. Okay. And he's carrying a couple of signs
12 that -- I don't know how legible they are. Other
13 than -- so we've established that you have seen him
14 demonstrate in 1987 in front of your house one time,
15 and you don't know of any other time he demonstrated
16 in front of your house in 1987. Is that correct?

17 A. That would be correct, yes.

18 Q. Did he do anything else in 1987 that you
19 consider acts that were calculated to harass,
20 embarrass or emotionally disturb you or your husband?

21 A. I do not remember.

22 Q. All right. How about 1988?

23 A. I don't remember.

24 Q. How about 1989?

25 A. I do not remember.