

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT OF
THE STATE OF FLORIDA, IN AND FOR
PINELLAS COUNTY, FLORIDA
CIVIL DIVISION CASE NO. 03-6649-CI-13

-----X
:
MELVIN SEMBLER and BETTY SEMBLER, :
Plaintiffs :
:
vs. :
:
RICHARD R. BRADBURY, :
Defendant. :
:
-----X

COPY

DEPOSITION OF: BETTY SEMBLER

TAKEN BY: Attorney for the Defendant
DATE: Friday, August 12th, 2005
TIME: Commencing at 9:30 a.m.
PLACE: St. Petersburg Courthouse
545 First Avenue North
St. Petersburg, FL 33701
Courtroom C
REPORTED BY: Karen Roman
Certified Court Reporter
Notary Public
State of Florida at Large

ORIGINAL

1 Q. How about 1990?

2 A. I was not in the country.

3 Q. Okay. 1991?

4 A. I was not in the country.

5 Q. Okay. You were in Australia during those years?

6 A. That is correct.

7 Q. Just so we don't have to go through every year,
8 what years were you in Australia?

9 A. From 1989 to 1993.

10 Q. All right. During the time of that posting, did
11 you ever return to Florida for, you know, a vacation
12 or just to check on things, that sort of thing?

13 A. Yes.

14 Q. When you did come back from time to time, did
15 Mr. Bradbury ever appear at your house?

16 A. I do not remember.

17 Q. Okay. Do you remember having any contact with
18 him during those times that you were in the states?

19 A. I do not remember.

20 Q. All right. Was there a hiatus period between
21 the time you all went to Rome and the time you ended
22 your service in Australia?

23 A. Would you repeat the question?

24 Q. Yes, ma'am. Was there a gap between the time
25 that you completed your -- or your husband's

1 assignment in Australia and went on to go to Rome?

2 A. Yes.

3 Q. Okay. How much time?

4 A. Eight years.

5 Q. Okay. And during that eight years, did you come
6 back and live in this area?

7 A. Yes, I did.

8 Q. So help me out here. What time frame would that
9 have been?

10 A. 1993 to 2001.

11 Q. Okay. So tell me between 1993 and 2001, do you
12 have any recollection of anything that Mr. Bradbury
13 did to -- that was calculated to harass, embarrass or
14 emotionally disturb you or your husband?

15 A. Yes, I do.

16 Q. All right. Please state what that is.

17 A. I believe it's stated in some of these papers
18 that he --

19 Q. Go ahead.

20 A. Approached my children. He came into our
21 offices --

22 Q. Okay.

23 A. -- with a very demanding way to see my husband.
24 And it was very threatening.

25 Q. Did you actually witness this?

1 A. No.

2 Q. Okay. Did somebody tell you that he did this?

3 A. Yes.

4 Q. Who told you this?

5 A. My husband.

6 Q. Do you know whether he saw this happen, or did
7 someone --

8 A. And my son.

9 Q. Do you know if your husband witnessed this, or
10 do you know whether somebody else told your husband
11 about this?

12 A. I do not know.

13 Q. And you mentioned your son. Which son would
14 that be?

15 A. Gregory.

16 Q. Okay. Now, you say he appeared at your office.
17 That's out on Central Avenue, I think?

18 A. That is correct.

19 Q. And how many times is it your understanding that
20 he showed up there?

21 A. A couple of times. I don't remember the exact
22 number.

23 Q. Do you -- if you don't know, that's fine. But
24 you think it was a couple of times?

25 A. Yes.

1 Q. All right. And do you know whether security was
2 ever called or anything of that nature, police?

3 A. I don't know.

4 Q. And then you say he had some kind of meeting --
5 confrontation with your children. Was that separate
6 from the -- whatever he did at the office? Was that a
7 different happening, a different event?

8 A. It was at the office, yes.

9 Q. Okay. So I guess what I'm -- I guess what I'm
10 trying to figure out is did this incident involving
11 one or more of your children occur the time or one of
12 the times he came to the office?

13 A. It occurred in the parking lot.

14 Q. Okay. Of the Sembler building or the office,
15 whatever it's called?

16 A. Yes.

17 Q. Okay. Do you recall any incident that occurred
18 inside the building as opposed to the parking lot?

19 A. No.

20 Q. You mentioned that -- in your complaint and you
21 did testify that some of the things that you say he
22 did are enumerated here, and in fact they are.

23 Paragraph 6 says that, "These efforts included
24 letter writing, picketing their home..." And it goes
25 through a bunch of other things. And we'll deal with

1 each of them as they come up.

2 The first one is letter writing. Did Mr.
3 Bradbury ever write a letter to you personally?

4 A. No.

5 Q. Okay.

6 A. To my husband.

7 Q. Okay. How many letters did he write to your
8 husband, if you know?

9 A. I don't.

10 Q. Okay. How did you find out that he had written
11 a letter to your husband?

12 A. I read it.

13 Q. You read the letter?

14 A. Yes.

15 Q. Okay. How did the letter get to you? Did your
16 husband bring it to you?

17 A. Yes.

18 Q. Okay. And was this a letter where he was asking
19 for money?

20 A. I don't remember that he was asking for money.
21 I don't recall the context of it.

22 Q. Okay. Hopefully, somebody's going to be
23 delivering some documents shortly, and we may revisit
24 that.

25 Do you recall anything about the contents in it

1 that were threatening?

2 A. I don't recall the exact contents, but the
3 overall tone was threatening.

4 Q. Okay. And --

5 A. In my opinion.

6 Q. Okay. Was he threatening to do something as far
7 as you know; I will do this or do that?

8 A. The overall tone of the letter was threatening.

9 Q. Okay. Did it emotionally disturb you when you
10 read the letter?

11 A. Very, very much so.

12 Q. Did you do anything about it?

13 A. I did not.

14 Q. Why not?

15 A. Because I -- I hoped that it would go away.

16 (Ms. Carnesoltas steps out of the room.)

17 BY MR. MCGOWAN:

18 Q. Was there a follow-up letter?

19 A. I do not recall.

20 Q. So if there wasn't one, it did go away as far as
21 the letter writing?

22 A. In a sense.

23 Q. At least the letter writing aspect that --

24 A. I don't know.

25 Q. You don't know. Okay.

1 The next category is picketing their home. And
2 you mentioned the one instance where you saw him
3 picket.

4 You're not aware of any other instance where he
5 picketed your home, are you?

6 A. I do not know whether or not he picketed, but
7 other people did, yes.

8 Q. Yeah. Let me show you what was marked Exhibit
9 10 to Mr. Bradbury's deposition. And I'll go ahead
10 and mark it 4 in this one.

11 (THEREPUON, Exhibit 10 is marked for
12 identification.)

13 MR. ENGLANDER: Let's just keep the same
14 numbers.

15 MR. MCGOWAN: Yeah. Let's do that. That makes
16 sense. Except stop me if I get to 10.

17 BY MR. MCGOWAN:

18 Q. This was marked Exhibit 10 to Mr. Bradbury's
19 deposition the other day.

20 And if you could, please, ma'am, take a look at
21 that and tell me -- just read through it and tell me
22 if that's the letter you were referring to earlier.

23 A. (Deponent peruses the exhibit.) I believe it
24 is -- other than this one.

25 Q. I'll represent to you that -- well, go ahead and

1 read it. I don't want to characterize it.

2 Have you ever seen that letter before?

3 A. Yes, I have.

4 Q. All right. And you believe there was another
5 letter other than this one?

6 A. As I recall, I think there was. I'm not sure.
7 Seems there was a longer one.

8 Q. Okay. At least if you could look through this
9 one, if you could tell me if there's anything in that
10 letter that you consider threatening?

11 A. I consider the whole thing threatening.

12 Q. The mere fact that he wrote a letter to your
13 husband?

14 A. Absolutely.

15 Q. Why is that?

16 A. Have you read the letter?

17 Q. Yes, ma'am, I have.

18 A. Yes. I consider it threatening.

19 Q. Okay. In that letter, he asks for money because
20 he wants to start up some kind of a business, and he
21 wants your husband's -- he says he wants your
22 husband's business expertise, and he wants some money.

23 Is asking for money something you consider
24 threatening?

25 A. I do.

1 Q. Okay. I would presume that this was not the
2 first time somebody asked your husband to give them
3 money to start a business. Would that be correct?

4 A. To my knowledge. I'm sure other people have, I
5 guess.

6 Q. Okay. Do you consider it threatening when
7 people ask your husband for money?

8 A. I do.

9 Q. Every time?

10 A. Considering separate circumstances.

11 Q. Okay.

12 (Ms. Carnesoltas enters the room.)

13 BY MR. MCGOWAN:

14 Q. I'm just saying in general. If somebody comes
15 and says, I'm starting a business. You've got some
16 capital. I want you to invest in this, is that act in
17 and of itself something that you consider threatening
18 if it's somebody other than Mr. Bradbury?

19 A. It depends on who's asking.

20 Q. If it's somebody who has a good track record in
21 the business community?

22 A. Of course.

23 Q. If it's Mr. Bradbury whose been involved in
24 lawsuits and has this history, does that history in
25 and of itself make this request for money threatening

1 to you?

2 A. Absolutely.

3 Q. And that's because why?

4 A. Because of the reasons that you just listed.

5 Q. Because he sued Straight?

6 A. Because he has been stalking and harassing us
7 and frightening me.

8 Q. Okay. This is 1996. Okay. And I'm trying to
9 go back to 1996 right now, and putting aside for a
10 moment things that have happened since that time, I'm
11 trying to understand what you know he did.

12 I mean, you've mentioned he picketed your house
13 one time to your knowledge. He came to the parking
14 lot of the office one time to your knowledge. He may
15 or may not have written some other letter. And he's
16 written this letter.

17 When you say "stalking," what else was he doing
18 that you were aware of when you read this letter in
19 1996?

20 A. I know what you're asking me, but the letter in
21 and of itself is threatening. It is threatening to
22 me.

23 Q. Okay. And I'm still -- I really don't want to
24 beat a dead horse. But I'm trying to understand why
25 you felt threatened by it.