

1 you there was another demonstration?

2 A. Yes.

3 Q. When was that?

4 A. It was on Valentines Day of 2004.

5 Q. Okay. Anything else?

6 A. That was the only one that was ever reported to
7 me while I was out of town that I know of.

8 MR. ENGLANDER: You're talking about at her
9 house?

10 MR. MCGOWAN: Yes. Yes.

11 BY MR. MCGOWAN:

12 Q. Okay. Other than talking about your fear to
13 your family -- and I don't want to ask you any
14 conversations you had with your husband or your lawyer
15 because that's privileged. Other than your children,
16 how about in-laws? Have you talked to them about it?

17 A. No.

18 Q. Daughter's-in-law?

19 A. They don't even --

20 Q. Friends?

21 A. (Deponent nods negatively.)

22 Q. Any professionals, counselors? Yeah? You have
23 to answer verbally, no?

24 A. No.

25 Q. Okay. What other emotional distress have you

1 suffered?

2 A. I've lost a lot of sleep over it. I find myself
3 fearful of things that I was never fearful of before.

4 Q. Such as?

5 A. Coming into my driveway with my car. I have a
6 procedure that I use that I've never used before.

7 Q. Okay. Anything else?

8 A. I'm very cautious when I get in and out of my
9 car. I also look and see who's around.

10 Q. Okay?

11 A. That I've never thought of, you know, never felt
12 before.

13 Q. What is it you think might be around your car?

14 A. People.

15 Q. Okay.

16 A. That would be threatening to me.

17 Q. So is this a case like where you kind of look
18 before you go out in your driveway to see if there's
19 anybody out there?

20 A. Yes, I do that.

21 Q. Okay. Has -- strike that. Anything else?

22 A. You'd have to ask me specifically.

23 Q. Well, I mean, I'm asking you. You've alleged
24 that you've suffered severe emotional distress?

25 A. Yes. I'm under severe emotional distress.

1 Q. And I'm trying to determine -- you've mentioned
2 fear?

3 A. Yes.

4 Q. You've mentioned that you've had trouble
5 sleeping?

6 A. That's correct.

7 Q. Do you still have trouble sleeping?

8 A. Yes, I do.

9 Q. Okay. I know that it's come out in discovery
10 that occasionally you may use something to sleep if
11 you have jet lag and that sort of thing.

12 Have you had to use sleeping medication?

13 A. I don't use sleeping medication, no.

14 Q. Okay. Do you by any chance keep like a diary or
15 journal?

16 A. No.

17 Q. Okay. We have fear. We have loss of sleep.
18 Any other emotional distress?

19 A. I have been moved to tears by it, yes.

20 Q. Okay. When was the last time you were moved to
21 tears by it?

22 A. I don't remember exactly, often.

23 Q. Okay. How about anger?

24 A. Yes. I've been very -- I would describe that as
25 outrage, yes.

1 Q. Okay. Anything else that you can think of?

2 A. Except extreme fear.

3 Q. Yes, ma'am.

4 A. I'm very fearful.

5 Q. Okay. Now with respect to this fear, you've
6 indicated that you're fearful maybe if there's people
7 out in the driveway?

8 A. Yes. I'm fearful of anybody around my home.

9 Q. Have you -- go ahead. I didn't mean to
10 interrupt.

11 Have you ever had occasion to see anybody?

12 A. I'm not up in the middle of the night, no.

13 Q. Okay. Have any of your fears been realized?

14 A. Yes.

15 Q. What?

16 A. Because Richard Bradbury by his own admission
17 has been stalking my house for many years. And he's
18 gone through my garbage. And he's been out there on
19 many occasions by his own admission. And that I was
20 unaware of it doesn't make it any less threatening.

21 Q. But in the past, I believe, that this fear was
22 generated by the exposure of this medical device.
23 That's what triggered your emotional distress; is that
24 accurate?

25 A. Mostly.

1 Q. Okay. When you say "mostly," that tells me that
2 there's something else.

3 A. Well, I was never really very comfortable with
4 it, no.

5 Q. With what?

6 A. With being stalked and harassed.

7 Q. Okay. Tell me what -- and, again, forgive me,
8 but when this all came to light, you were
9 still -- your husband was still serving as ambassador
10 to Italy; is that right?

11 A. Yes.

12 Q. What duties as the ambassador's wife, if any,
13 did you have? Did you have any duties?

14 A. Yes.

15 Q. What kind of things -- what kind of duties did
16 you have?

17 MR. ENGLANDER: You're asking her for her
18 official duties as a wife to the United States
19 ambassador of Italy?

20 MR. MCGOWAN: Right.

21 THE DEPONENT: Well, there aren't any specific
22 duties, no.

23 BY MR. MCGOWAN:

24 Q. But I understand that you received people --

25 A. Of course. But none of that is required. I'm

1 not an assigned employee of the United States
2 government.

3 Q. I understand. But as a matter of custom as a
4 wife of the ambassador, did you not perform certain
5 functions to compliment your husband?

6 A. Of course.

7 Q. That would include going to receptions, I would
8 assume, meeting people, receiving people at the
9 embassy?

10 A. Yeah.

11 Q. Those kinds of things. Did any of this business
12 with Bradbury affect the way you performed any of
13 these duties?

14 A. I can't say that it affected the way I did it.
15 But I certainly heard about it, yes, from people.

16 Q. You're talking about people in Italy?

17 A. I'm talking about citizens here, friends of mine
18 who would tell me about it, yes.

19 Q. What would they tell you?

20 A. That they had heard that there was somebody who
21 was stalking us; and that they put an advertisement on
22 E-bay and in the newspaper.

23 Q. How do you think they heard about that?

24 A. I don't know.

25 Q. Could it have been the filing of the complaint

1 caused them to hear about it?

2 A. I have no idea.

3 (THEREUPON, a lunch recess was had.)

4 MR. MCGOWAN: During break, I inadvertently took
5 Exhibit 2 back ot the office with me. And the court
6 reporter pointed out and put it back in the record,
7 just to have a clean record.

8 MR. ENGLANDER: No problem.

9 BY MR. MCGOWAN:

10 Q. Mrs. Sembler, if you could, I'm going to ask you
11 to take yet another look at Exhibit 6 to this
12 deposition, Exhibit 2 to the Bradbury deposition. And
13 if you'd be so kind as to take a look at the top
14 there, there's a fax trail or whatever that's called.
15 And it says from the Sembler company.

16 And I'm wondering if the number there is -- if
17 you know whether or not that number is a fax number
18 for the Sembler company.

19 A. Not that one that I know, no.

20 Q. Okay. Then there's a handwritten notation
21 there. It says "The Straights." I'm wondering if you
22 recognize that handwriting?

23 A. No, I don't.

24 Q. Okay. I am now going to show you Exhibit No. 6
25 to the Bradbury deposition. We'll call it 6A for this

1 one.

2 (THEREUPON, Exhibit No. 6A is marked for
3 identification.)

4 THE DEPONENT: (Deponent peruses the exhibit.)

5 BY MR. MCGOWAN:

6 Q. If you could have a look at that and say whether
7 or not you've ever seen that before.

8 A. What is this a picture of?

9 Q. Technically, I really don't get the -- I believe
10 it's a picture of the device. But I don't know.

11 MR. ENGLANDER: Part of the package?

12 MR. MCGOWAN: Or part of the package, yeah.

13 THE DEPONENT: Part of what package?

14 BY MR. MCGOWAN:

15 Q. I'm assumeing the package of the device. I
16 honestly can't tell you because I don't know.

17 A. No. I've never seen this before.

18 Q. Okay.

19 MR. ENGLANDER: Is she refering to the entire
20 exhibit or --

21 BY MR. MCGOWAN:

22 Q. I would ask the entire exhibit, the E-bay ad.

23 A. No.

24 Q. This is purportedly an E-bay ad that
25 Mr. Bradbury ran. And my question to you is, is this

1 the first time you're seeing it?

2 A. I've never seen this particular one, but
3 I have one. I think I have anyway.

4 Q. You think you've seen, if not this one, another?
5 Because I think it went through a couple of
6 iterations.

7 A. Okay.

8 Q. You think you have seen it?

9 A. Some --

10 Q. Or something similar?

11 A. I don't know that I've seen this exact piece.

12 Q. I understand. When did you see any iteration of
13 the E-bay ad relating to this medical device?

14 A. I would say shortly after it ran I suppose.

15 Q. Okay. And who showed it to you?

16 A. I don't remember.

17 Q. Did you go on the internet and look for it
18 yourself?

19 A. No.

20 Q. Did you ever see it on a computer as opposed to
21 on a piece of paper?

22 A. No.

23 Q. You mentioned that typically one of your
24 household employees takes out the garbage?

25 A. My housekeeper.

1 Q. Your housekeeper. Have you had the same
2 housekeeper since 1992?

3 A. Yes. I think -- no, not '92, 1993.

4 Q. Okay. So the current housekeeper you have
5 you've had since 1993?

6 A. Yeah.

7 Q. And what is his or her name?

8 A. Her name is Gabrielle Honical (phonetic).

9 Q. Okay. And is she a live-in housekeeper --

10 A. No.

11 Q. -- or does she have her own place? Okay.

12 With regard to how the device got into the
13 garbage, do you have any knowledge as to how it was
14 put there, who put it there? Is that something I
15 should ask Mr. Sembler?

16 A. Yes, because my assumption is he put it there.

17 Q. Okay. Would this housekeeper be responsible,
18 for instance, in going around the house and going to
19 various trash cans which I assume you have in
20 different rooms and emptying those and then emptying
21 everything into a larger bag or what have you to take
22 it out to the street?

23 A. Yeah.

24 Q. Okay. Do you know whether or not your
25 housekeeper is married?

1 A. She's widowed.

2 Q. Does she have a family, children?

3 A. Yes, uh-huh.

4 Q. Do they live with her, do you know?

5 A. One son, yes.

6 Q. Does she have an extended family that lives with
7 her: Cousins, aunts, uncles, that kind of thing? Do
8 you know?

9 A. No.

10 Q. Okay. At this point, what I'd like to do is go
11 through your interrogatories. This is Exhibit 11.
12 These are Betty Sembler's answers to interrogatories
13 (THEREUPON, Exhibit No. 11 is marked for
14 identification.)

15 MR. ENGLANDER: To make it easy before you ask
16 her a question about a specific thing, why don't you
17 show it to me.

18 (Deponent peruses the file.)

19 BY MR. MCGOWAN:

20 Q. I'm going to show you the entire package of the
21 amended answers to interrogatories. I'm just going to
22 ask you to identify it for now and tell me if you and
23 your husband signed them. Just flip through the
24 pages.

25 A. (Deponent peruses the exhibit.) Yes, that is my