

1 it would be better if you didn't put the exhibit
2 stickers over writing.

3 MR. MCGOWAN: Do you want to try to move it?

4 MR. ENGLANDER: Any place you'd like, but don't
5 block anything on there. I appreciate it.

6 BY MR. MCGOWAN:

7 Q. Finally, this is Exhibit 15.

8 (THEREUPON, Exhibit No. 15 is marked for
9 identification.)

10 MR. ENGLANDER: This is Exhibit 15?

11 MR. MCGOWAN: Yeah.

12 MR. ENGLANDER: (Peruses the exhibit.)

13 BY MR. MCGOWAN:

14 Q. Ms. Sembler, this I think was taken off the
15 internet. And it appears to be a home page for Drug
16 Free America. Have you seen that internet site?

17 A. Uh-huh, yup.

18 Q. Yes?

19 A. (Deponent nods affirmatively.) Yeah.

20 Q. This listed you and it lists a couple other
21 foundations or boards that you're affiliated with.

22 Just in the interest of clarity, you mentioned a
23 number of them this morning. I think there's some
24 Governor's Mansion Foundation, something about Florida
25 National Guard counterdrug training advisory board?

1 MR. ENGLANDER: I can't hear you.

2 MR. MCGOWAN: I apologize.

3 BY MR. MCGOWAN:

4 Q. I just don't recall you mentioning the
5 Governor's Mansion Foundation and some kind of
6 National Guard multijurisdictional county drug
7 training advisory board. Are you also on those?

8 A. I was.

9 Q. Oh, you were?

10 A. Yes.

11 Q. Okay. And then on page 3, it's got a listing
12 of -- you tell me who they are. It says International
13 Scientific and Medical Forum on Drug Abuse
14 Participants. And the name Virgil Miller Newton is
15 circled. Do you know who that individual is?

16 A. Certainly.

17 Q. Okay. Is he somebody that you consider as
18 having done outrageous acts against other people?

19 A. Absolutely not.

20 Q. Is he a friend?

21 A. A very close and dear friend and a valued one.

22 Q. Okay. Are you aware of any actions in which
23 Mr. Bradbury's been participating regarding to zoning
24 disputes?

25 A. Yes, I have heard about that.

1 Q. And does that make you feel threatened?

2 A. Absolutely.

3 Q. How?

4 A. It was directed toward a friend of mine of long
5 standing who I know to be an outstanding individual.
6 And I considered that to be outrageous and threatening
7 both to him and to me.

8 Q. Okay. What did Mr. Bradbury do that was
9 outrageous and threatening?

10 A. He picketed his house. The man is sick.
11 There's no reason to picket with him at all. He went
12 to a hearing where he was opposing to have something
13 rescheduled and protested against it.

14 Q. Okay. How did that hearing come out?

15 A. The favor of Dr. Newton as far as I know.

16 Q. Did you ever tell anybody not to work with
17 Mr. Bradbury?

18 A. I beg your pardon?

19 Q. Did you ever tell anybody not to work with
20 Mr. Bradbury and whatever efforts he was making?

21 A. I don't know anybody to say that to. No, sir, I
22 never have done that.

23 MR. MCGOWAN: Mr. Bradbury has indicated that he
24 has some kind of question. So what I'd like to do is
25 go out and see what it is he wants me to ask. And

1 after that, I think I'm finished.

2 (THEREUPON, a recess was had.)

3 BY MR. MCGOWAN:

4 Q. I just have one more question for you.

5 With regard to this business of whatever
6 Mr. Bradbury was doing to or against Mr. Newton, did
7 you make any calls to anyone on Mr. Newton's behalf?

8 A. No.

9 MR. MCGOWAN: That's all I have. Thank you very
10 much.

11 MR. ENGLANDER: If it's ordered, we want a copy.
12 And we'll read if it's ordered.

13 MR. MCGOWAN: I want the original, and you can
14 give me a mini.

15 (THEREUPON, the deposition was concluded at 1:32 p.m.)
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25

1 I have read the foregoing pages and herewith
2 subscribe to the same as a true and correct
3 transcription of the questions contained therein and
4 my answers thereto, subject to the corrections noted,
5 if any there be.

6
7
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9 _____
10 DEPONENT

11
12 _____
13 WITNESS

14
15 _____
16 DATE
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CERTIFICATE OF OATH

STATE OF FLORIDA)
 : ss.
 COUNTY OF PINELLAS)

I, the undersigned authority, certify that
 BETTY SEMBLER personally appeared before me and was
 duly sworn.

WITNESS my hand and official seal this 31st
 day of August, 2005.



Karen Roman

Notary Public, State of Florida

Commission No.: DD 028202

My Commission Expires: 05/22/2005



Karen Roman
 Commission # DD435422
 Expires May 30, 2009
 Bonded Tray Fain - Insurance, Inc. 800-385-7019

1 CERTIFICATE OF COURT REPORTER

2 STATE OF FLORIDA)


3 : ss.

4 COUNTY OF PINELLAS)

5
6 I, Karen Roman, Certified Court Reporter,
7 certify that I was authorized to and did
8 stenographically report the deposition of BETTY
9 SEMBLER that a review of the transcript was requested;
10 and that the transcript is a true and correct record
11 of my stenographic notes.

12
13 I FURTHER CERTIFY that I am not a relative,
14 employee, attorney or counsel of the parties, nor am I
15 a relative or employee of any of the parties' attorney
16 or counsel connected with the action, nor am I
17 financially interested in the action.

18
19 DATED this 31st day of August, 2005.

20
21
22
23 

24 Karen Roman

25 Certified Court Reporter

1 PLEASE ATTACH TO THE DEPOSITION OF BETTY SEMBLER
2 IN THE CASE OF Melvin Sembler and Betty Sembler v.
3 Richard R. Bradbury

ERRATA SHEET

INSTRUCTIONS:

4 Please read the transcript of your deposition
5 and make note of any errors in the transcript on this
6 page. Do not mark on the transcript itself. Please
7 sign and date this sheet and sign the transcript on
8 page 101. Thank you.

9 Page Line Error or Amendment Reason

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19 I have read the transcript and, except for any
20 corrections or amendments noted above, I hereby
21 subscribe to the transcript as an accurate record of
22 the statements made by me.

Signature of the

Deponent: _____

Date: _____

Witness: _____

23 *I have verified my stenographic notes and agree only
24 to the above changes as initialed by me.

Reporter: _____

Karen Roman

Executive Reporting Service

Post Office Box 3804
St. Petersburg, Florida 33731
(727) 823-4155

August 31, 2005

LEONARD S. ENGLANDER, ESQ.
Englander & Fischer, P.A.
721 First Avenue north
St. Petersburg, FL 33701

Re: Melvin Sembler and Betty Sembler v. Richard R.
Bradbury

Dear Mr. Englander:

Enclosed is your copy of the deposition of BETTY
SEMBLER taken on August 12, 2005, in the above-styled
case. Please have your client read your copy of her
deposition and note any corrections on the errata
sheet provided. Please have her sign the signature
page (page 101) and the errata sheet (page 104) before
a witness.

Please mail copies of the signature page and
errata sheet on or before September 29, 2005 to:
Executive Reporting Service, Post Office Box 3804, St.
Petersburg, Florida 33731, to be included with the
original transcript. Failure to do so will be
considered a waiver of the right to read and sign.

Please contact our office if there are any
questions you may have. Thank you for your prompt and
careful attention to this matter.

Sincerely,


Karen Roman

Certified Court Reporter

cc: Thomas McGowan, Esq.