

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

MELVIN SEMBLER and BETTY
SEMBLER,

Plaintiffs,

vs.

UCN 522003CA006649XXCICI
REF 03-6649-CI-13

RICHARD R. BRADBURY,

Defendant

AMENDED
ANSWERS TO INTERROGATORIES OF
MELVIN SEMBLER AND BETTY SEMBLER

Instruction – Please interpret the words of these interrogatories in plain English. If you do not know a specific date, time, place or other like information, please indicate as much and provide your best approximation.

1. State your name, and the name and address(es) of each person assisting you in answering these interrogatories.

Melvin Sembler and Betty Sembler - U.S. Embassy, Rome, Italy
Ana-Maria Carnesoltas, Esq., Englander & Fischer, P.A., 721 First Avenue N., St.
Petersburg, Florida 33704.

2. Please state with particularity the date(s) time(s) place(s) and circumstances of each incident of "letter writing" "picketing" "phone calling" and "stalking" to which you refer in paragraph six of your verified complaint.

Since 1988, there have been numerous contacts of those specified. These are some of them: e-mails 6/27/2000, received at the Sembler Company's website; mail 7/10/88; 10/20/88; 9/23/1988; 8/22/89; undated 1988 letter identified in the 6/27/2000 e-mail; 10/16/96; Phone calls: 4/13/89; Physical: 4/13/89; Defendant's admissions that he has been to the Plaintiffs' residence in Treasure Island several times in the last 10 years; and, picketing, Defendant's admissions and photographs showing him picketing the home in 2002.

3. Please state each fact on which you rely to support your allegation that Richard Bradbury has a "fixation" with you, your spouse, or both of you.

The many letters, phone calls, and statements to others about us in the past. The tone and content of his communications, his admissions that he has rummaged through our garbage for 10 years, his continuous defamatory statements about us.

4. Please state the name, and the media entity for which each of the "reporters" works to which you referred in paragraph nine of your verified complaint.

Robin Guess---ABC Action News

Richard Bockman---St. Petersburg Times

5. Please state with particularity each and every event which caused you to believe that Richard Bradbury was "obsessed but harmless," as set forth in paragraph eleven of your verified complaint.

His known activities prior to 2003 seemed to be limited to letters, phone calls, and defamatory statements about us to others. Even though he had picketed our home, it was not until 2003 that we learned that he was secretly coming to our home and rummaging through our garbage on a regular basis for the last 10 years. See also answers to Interrogatories number 3 and 4 above.

6. Please state with particularity what caused you to determine that Richard Bradbury is no longer "harmless."

The activities known to us prior to 2003 made us think that he was harmless. But our perception of him changed once we learned, by his own admissions that he has been skulking around our home regularly during the last ten years and rummaging through our garbage. Also, his taking outrageous steps to publicly embarrass and demean us by seeking to financially profit from intimate items found in our garbage and then seeking to extort money from us.

7. Please identify all persons (other than doctors, nurses, lawyers and other persons with whom you have had privileged communications) to whom you disclosed the fact that Melvin

Sembler was stricken with prostate cancer from date he was diagnosed, through the date of the filing of your verified petition.

Our children, personal friends and other individuals connected with our work, on a need to know basis, so they would know what was the surgery that the Ambassador was undergoing. The surgery took place in 1990 or 1991, and we do not remember the names of everyone who was told. We also have advised some male acquaintances to seek testing which provides early detection of the disease. However, we did not tell anyone about the existence of the medical device involved in this case. This became known only after the publication of the device by the Defendant.

8. Please state why you believe you have and state your understanding of an ownership interest in the trash you place outside of your home for collection.

The fact that we must dispose of items of great personal intimacy in the garbage does not deprive us of the right to keep those items from being publicized for the purpose of humiliating and demeaning us. This is an invasion into the sanctity of our home and our bedroom. Those items belong to us and not to the Defendant or the public at large.

9. Please state each component of the emotional distress which you claim arose as the result of the Defendant's actions as set forth in your verified complaint.

The Defendant has engaged in a pattern of harassment over the years, culminating with his most recent, extremely outrageous conduct. It was designed solely to humiliate, demean and mock us. It has caused us great embarrassment. Betty Sembler has found it difficult to sleep, has cried many times. We have both become concerned for our safety and the safety of our family.

10. Have you received any care, treatment or prescriptions from any psychiatrist, psychologist or other health care provider (mental or physical) which you claim arose as the result of the actions of the defendant as set forth in your verified complaint?

No

11. If the answer to the foregoing is in the affirmative, please state the name, address and telephone number of each health care provider you listed in the answer to your previous questions.

Not applicable.

12. Have you ever sought professional mental health counseling at any level for any purpose from 2000 through the present?

No.

13. If so please identify the name address and telephone number of each.

Not applicable.

14. Have you ever been prescribed medication for anxiety, depression, or to sleep at any time since 2000. If so, please identify with as much particularity as you can the medication(s), the doctor(s) who prescribed the medication(s), the address of the doctor(s) and the pharmacy(ies) from which you obtained said medication(s).

In the last five years the only medication prescribed Dr. Charles R. Freeble, III, 7111 First Avenue S, St. Petersburg, Florida, CVS on Central 57th for sleep was Ambein. this is for the jet lag caused by our travels. Only used when needed.

15. Please state your understanding of what has motivated Richard Bradbury to picket your house.

His effort to extort monies from us. His sadistic desire to inflict pain on people. His desire to avoid responsibility for his own actions.

16. Please state every fact you rely on for your assertion in paragraph twenty-nine of the verified complaint which supports the allegations that Richard Bradbury intended to cause you emotional distress.

His stalking, his defamatory statements, his angry and insulting comments in the mail he has sent, his seeking to sell an intimate personal item for personal gain, his attempt to extort money from us.

17. Please state the name, address and telephone number of every person who you believe to have knowledge of any fact alleged in your verified complaint.

The parties, representatives of eBay, representatives of the St. Petersburg Times, the parties described in answer to interrogatory number 4. Discovery is ongoing and the Plaintiffs may learn of others during the life of this case.

DATED: 9 February 2005

Melvin Sembler
MELVIN SEMBLER

DATED: 9 February 2005

Betty S. Sembler
BETTY S. SEMBLER

U.S. EMBASSY
ROME, ITALY
Republic of Italy
Province of Rome
City of Rome
Embassy of the United States of America

Sworn to or affirmed and signed before me on FEB 09 2005 by
MELVIN SEMBLER and BETTY S. SEMBLER who are known by me.

Mark A. Schapiro
ATTESTING OFFICER

Mark A. Schapiro
Consul of the United States
of America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to: THOMAS H. MCGOWAN, ESQ., 150 Second Avenue North, Suite 870, St. Petersburg, FL 33701, this 9th day of February, 2005.

Leonard S. Englander

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