

1     A.    I felt threatened by it because he was asking us  
2     for money in the nature of extortion.

3     Q.    Okay.  What is extortion -- what does the word  
4     "extortion" mean to you?

5     A.    Trying to get money from somebody under false  
6     pretenses.

7     Q.    Okay.  In this letter, he says that he started a  
8     business and that they're doing very well and that he  
9     needs capital and some business advice.

10           Do you know whether the pretenses he has set out  
11     in this letter, Exhibit 10, were true or false?

12     A.    I would assume that they were false.

13     Q.    Do you know that they were?

14     A.    I do not.

15     Q.    Okay.  So if they were not false, it would not  
16     have been extortion in your mind?

17     A.    It was extortion in my mind.

18     Q.    Okay.  But you never checked out to see whether  
19     any of these allegations were true; is that right?

20     A.    No, I did not.

21     Q.    You just assumed they were false?

22     A.    I did.

23     Q.    And you just assumed when somebody asked for  
24     money under false pretenses it was extortion?  You  
25     considered he was extorting or perhaps extorting your

1 husband?

2 A. That is correct.

3 Q. Okay. I know you're not a lawyer. But do you  
4 happen to know by any chance what the legal definition  
5 of extortion is?

6 A. No.

7 Q. Okay. Okay. The next category here is  
8 again -- and we're talking about beginning 1987,  
9 things that Mr. Bradbury, you say, he did. It says  
10 calling. I assume that means calling on the  
11 telephone.

12 Did Mr. Bradbury ever call you on the telephone?

13 A. Not to my knowledge.

14 Q. Have you ever spoken to Mr. Bradbury?

15 A. No.

16 Q. Other than -- he's sitting here today. Other  
17 than seeing him picketing your house that one time,  
18 have you ever, to your knowledge, seen him since?

19 A. No.

20 Q. Okay. Do you have any information that he ever  
21 placed a phone call to your husband?

22 A. I've been told that, yes.

23 Q. Who told you?

24 A. My husband.

25 Q. Okay. What did he tell you?

1 A. Exactly what you just said.

2 Q. That he called?

3 A. Yes.

4 Q. Did he say what the nature of the call was?

5 A. No.

6 Q. Did he say whether he took the call?

7 A. No.

8 Q. Do you know whether he took the call?

9 A. I do not.

10 Q. Do you know how many times Mr. Bradbury called?

11 A. I do not.

12 Q. How many times has your husband told you that  
13 Mr. Bradbury called?

14 A. I do not recall.

15 Q. Okay. And then it says stalking the Semblers.  
16 What do you mean by "stalking"?

17 A. The legal definition of stalking, being  
18 followed, being harassed, lurking around my home. I  
19 think that's stalking.

20 Q. Okay. Now, in 1996, you didn't know whether he  
21 was, as you say in your words, lurking around your  
22 home; is that right?

23 A. No. I was not aware of that.

24 Q. So that wouldn't count -- I mean, that component  
25 of stalking would not have been on your radar in 1996;

1 is that right?

2 A. That is correct.

3 Q. It then mentions your children. And you've  
4 mentioned an incident in the parking lot with, I  
5 think, one of your children?

6 A. That's correct.

7 Q. Which one was that?

8 A. As I said before, it was my son Gregory.

9 Q. Any other of your children?

10 A. My daughter-in-law.

11 Q. Okay. Would that be Gregory's wife?

12 A. That is correct.

13 Q. Was she present with Gregory?

14 A. That is correct.

15 Q. So this is the parking lot incident?

16 A. (Deponent nods affirmatively.)

17 Q. Are you aware of any other incidents involving  
18 your daughter-in-law, Gregory's wife?

19 A. No.

20 Q. How about any of your other children?

21 A. Not to my knowledge.

22 Q. All right. Okay. Then paragraph 7 says, "So  
23 notorious was this campaign in 1988, when Bradbury was  
24 arrested and charged with burglary, a condition of his  
25 release was a court order that he not approach or go

1 near the Semblers's home their place of business or  
2 their families." And then there's a footnote that  
3 gives the case number of that case.

4 Were you familiar with that case back in '88?

5 A. I knew that it had occurred, yes.

6 Q. What was your understanding of what Mr. Bradbury  
7 did to get arrested?

8 A. He broke into the building, Straight building.

9 Q. Okay. And Straight is a separate entity. You  
10 are not Straight. Straight was a corporation. Is  
11 that correct?

12 A. Yes.

13 Q. Okay. So do you consider his acting against  
14 Straight acting against you personally as well?

15 A. Yes, I do.

16 Q. Why is that?

17 A. Because of our sponsorship of the program.

18 Q. Okay. So do you consider criticism of Straight  
19 criticism of you personally?

20 A. When it's false, yes.

21 Q. Okay. Are you aware of an individual by the  
22 name of Arnold S. Trebach?

23 A. Yes.

24 Q. Okay. And who is he?

25 A. I believe he's a retired professor from

1 Washington University.

2 Q. American University?

3 A. American University.

4 Q. He's -- would you characterize him as a critic?

5 A. As a what?

6 Q. As a critic of Straight?

7 A. Possibly.

8 Q. Okay. Do you recall an incident in Australia  
9 where he got up and gave a speech?

10 A. Yes, I do recall it.

11 Q. What do you recall about that?

12 A. It was a meeting in Melbourne, Australia. He  
13 was there.

14 Q. Okay. And did he give some kind of a speech or  
15 presentation at that meeting?

16 A. Yes.

17 Q. Okay. And was he critical of what he calls  
18 tough love programs such as Straight in his remarks?

19 A. I don't recall.

20 Q. All right. He mentions that a Dr. McDonald was  
21 also there?

22 A. Yes.

23 Q. Do you recall that?

24 A. Yes, I do.

25 Q. Who is Dr. McDonald?

1 A. He is a retired pediatrician.

2 Q. Does he -- did he have any involvement with  
3 Straight?

4 A. Yes.

5 Q. What was that?

6 A. That's confidential.

7 Q. It's confidential. Why is it confidential?

8 A. Because the anonymity part of the program.

9 Q. Okay. This is because any records that get  
10 generated by participants of the program need to be  
11 kept confidential?

12 A. To my knowledge.

13 Q. Okay. Is there a -- he apparently, at least  
14 according to Mr. Trebach, had some fairly harsh  
15 criticism of Mr. Trebach's position and defended  
16 basically the policies that Straight endorses and was  
17 very harsh in his comments according to Mr. Trebach.

18 Do you recall that?

19 A. Yes, I do.

20 Q. Was -- when he made his comments, did he make it  
21 clear that he had some affiliation with Straight?

22 A. I don't recall. It was a very long time ago.

23 Q. What I'm getting at really is if he had some  
24 position without disclosing any confidential  
25 communications he may have had with people, I mean,

1 did he hold some title or some --

2 A. Who?

3 Q. Dr. McDonald.

4 A. A title?

5 Q. Yeah, title, position; supervisor,  
6 vice-president. I don't know. I mean --

7 A. Would you clarify that, please?

8 Q. Yes, ma'am. You said that his involvement in  
9 Straight is confidential. And I'm trying to figure  
10 out if the involvement itself is confidential or if  
11 what he did because of his involvement with  
12 participants was confidential.

13 A. I can't answer that question. I don't  
14 understand it.

15 Q. Okay. Mr. Trebach goes on to say that your  
16 husband was the keynote speaker at this dinner.

17 MR. ENGLANDER: Excuse me. Just so I  
18 understand, you just prefaced your question by, "He  
19 goes on to say that..." Are you reading from  
20 something you want to show the witness or me?

21 MR. MCGOWAN: Sure. Be happy to.

22 MR. ENGLANDER: You want this as an exhibit?

23 MR. MCGOWAN: Let's make it one for the record.

24 MS. CARNESOLTAS: What exhibit number are we up  
25 to?



1 MR. MCGOWAN: Five.

2 (THEREUPON, Exhibit No. 5 is marked for  
3 identification.)

4 BY MR. MCGOWAN:

5 Q. We've now marked this as Exhibit 5.

6 MR. ENGLANDER: May I see it, please?

7 MR. MCGOWAN: Of course.

8 MR. ENGLANDER: (Peruses the exhibit.)

9 THE DEPONENT: (Deponent peruses the exhibit.)

10 MR. ENGLANDER: Do you have a question about  
11 that?

12 MR. MCGOWAN: Yeah, I do. Mrs. Sembler is  
13 reading it.

14 MR. ENGLANDER: You want her to read the whole  
15 thing?

16 MR. MCGOWAN: No, unless she wants to.

17 MR. ENGLANDER: Well, if you're going to ask her  
18 questions about it.

19 MR. MCGOWAN: Go ahead and let her. I'm going  
20 to call my office. I'll take five minutes.

21 MR. ENGLANDER: So that she has an opportunity  
22 to read it.

23 MR. MCGOWAN: By the way, Mrs. Sembler, I forgot  
24 to say this early on. Any time you need to take a  
25 break, just say so.

1           Let's take five minutes.

2           (THEREUPON, a recess was had.)

3           MR. MCGOWAN: Mrs. Sembler, while we were on  
4 break, did you have an opportunity to look through  
5 Exhibit 5?

6           A. Yes.

7           Q. Does that refresh your memory as to what may or  
8 may not have gone on that evening?

9           A. Somewhat, yes.

10          Q. Okay. Is this summary fairly accurate in your  
11 opinion?

12          A. No.

13          Q. What is inaccurate about it?

14          A. What is inaccurate about it is the tone, the  
15 conclusion in his statement; that when he says that we  
16 are embarrassments. I don't know why he would say  
17 that. I've never had anything to do with the man.  
18 And I was just in the audience, so --

19          Q. Right. That's his opinion whether --

20          A. Well, my opinion is that it's false.

21          Q. Okay. Do you consider this a threat?

22          A. I do.

23          Q. Okay. Because he calls you an embarrassment?

24          A. I do.

25          Q. You did consider that a threat?

1 A. I certainly do.

2 Q. Okay. He calls your husband "gracious" I think  
3 in this?

4 A. Yes. I noticed that.

5 Q. I would assume you agree with that?

6 A. Yes. My husband is gracious.

7 Q. He also makes a comment that some Dutch policy  
8 official referred to Straight participants as Hitler  
9 Jungen, which I assume means youth.

10 Did you notice that in there?

11 A. No, I didn't.

12 Q. It's in the first paragraph on page 3.

13 MR. ENGLANDER: Let me interpose an objection.  
14 I mean, this is not even reasonably calculated to lead  
15 to discovery.

16 MR. MCGOWAN: Well, you know this whole issue  
17 was brought up in the Bradbury deposition. And  
18 there's been suggestions that he is driven by some  
19 sort of agenda beyond Straight.

20 MR. ENGLANDER: Not by us, maybe by  
21 Mr. Bradbury.

22 MR. MCGOWAN: No. No. You specifically asked  
23 him -- you specifically asked him if he sought  
24 treatment at the Camp Jewish Center because of some  
25 connection with his protesting the Holocaust. You