

1 also asked him whether or not he began referring to
2 the Straight, the Straight people, as victims of a
3 Holocaust as generated by some antisemitic agenda
4 suggesting perhaps that because they were on the board
5 of the Holocaust museum that this is some sort of
6 hidden agenda Mr. Bradbury has.

7 And that this is somebody entirely different
8 using the same extreme kind of rhetoric.

9 MR. ENGLANDER: Two things. Mr. Bradbury is the
10 one who interjected that; number 2, you might as well
11 line up 75 thousand people who can sit back and say
12 this organization does this, that organization does
13 that. That's irrelevant to this case. You haven't
14 pled that as a defense.

15 You know, Mr. McGowan, I really don't want to
16 waste an awful lot of time. If you've got a couple
17 questions you want to wrap up, that's fine with me.
18 But if not, I would object and say let's take it down
19 to the judge.

20 MR. MCGOWAN: I have a few questions on this,
21 and then we'll move on.

22 MR. ENGLANDER: Okay.

23 BY MR. MCGOWAN:

24 Q. I would assume you find that very offensive?

25 MR. ENGLANDER: "That" being antisemitism?

1 MR. MCGOWAN: No, the participants of Straight
2 with Hitler youth.

3 BY MR. MCGOWAN:

4 Q. I would assume that's an offensive comment?

5 A. Extremely.

6 Q. Okay. Do you -- are you aware of internet
7 message boards and web sites that have to do with
8 people who consider themselves victims of Straight?

9 A. Yes, I am aware of them.

10 Q. Do you ever visit those web sites?

11 A. I do not.

12 Q. Why is it that you don't?

13 A. Because they're false.

14 Q. Okay. And would it also be because they're
15 offensive?

16 A. They are offensive, yes.

17 Q. Okay.

18 A. And threatening.

19 Q. Okay. And I would assume that it's fair to say
20 that you've got better things to do than read people
21 saying nasty things about you or the work you've done?

22 A. Yes.

23 Q. Okay. Going back to the initial complaint,
24 which is Exhibit 2, we were talking about Mr. Bradbury
25 being arrested in 1988 charged with burglary.

1 Do you know how that case turned out, the
2 burglary case?

3 A. You mean whether or not he was adjudicated?

4 Q. Yes, ma'am.

5 A. I think so, yes. I think he was adjudicated.

6 Q. Okay. Do you know whether or not the injunction
7 that came out of that case was lifted; that the
8 injunction was dissolved in the 1988 case?

9 A. I think so. I think it had a time limit on it.

10 Q. Yeah. And time expired?

11 A. I believe so.

12 Q. Did you take any action -- strike that. Were
13 you aware at the time that this injunction either was
14 about to or had expired?

15 A. No.

16 Q. All right. Did there come a time when you
17 became aware that the injunction had expired?

18 A. Probably.

19 Q. Okay. Did you do anything to try to get it
20 reinstated?

21 A. Yes, I have.

22 Q. Okay. Starting with the first action you took
23 to get it reinstated, tell me everything you've done
24 to get it reinstated?

25 A. I have hired counsel in order to get -- not that

1 particular one reinstated but a separate one, I
2 assume.

3 Q. Okay. Are you talking about Mr. Englander?

4 A. I am.

5 Q. Okay. Mr. Englander, I think you hired a couple
6 years ago, and we'll get to that.

7 But back in '88, '89, in that time frame, did
8 you hire counsel to do anything?

9 A. '80 what?

10 Q. '88, '89, that time frame to get that injunction
11 reinstated.

12 A. I don't recall doing that, no.

13 Q. Paragraph 8 says that Bradbury's fixation with
14 the Semblers never ceased. What evidence do you have
15 that Richard Bradbury has a fixation with you and your
16 family?

17 A. By his own words.

18 Q. His own words?

19 A. Yes, his testimony.

20 Q. And what words would that be?

21 A. That he's been stalking around my house,
22 invading my privacy, trying to embarrass us, trying to
23 extort money from us.

24 Q. When you say "in his words," I'm assuming you
25 read his deposition?

1 A. I have.

2 Q. He never says, I invated their privacy. That's
3 your conclusion. He admits to having done certain
4 things. It's your conclusion?

5 A. He invated my privacy.

6 Q. Let's talk about that. How did he invade your
7 privacy?

8 A. By stalking around my house.

9 Q. Okay.

10 A. For ten years, by his own admission.

11 Q. During that time, do you have any knowledge,
12 that he trespassed on your property?

13 A. He had to.

14 Q. How?

15 A. If he went into my garbage, he had to.

16 Q. How is that?

17 A. Because it's on my property.

18 Q. Is it on your property, or is it on a swell that
19 belongs to the city?

20 A. It's on my property.

21 Q. Have you done a survey to determine --

22 A. No, I have not.

23 Q. Okay. Then how do you know it's on your
24 property?

25 A. Because I know my property.

1 Q. Okay. And is part of your property in the front
2 that's dedicated to the city?

3 A. Part of it is, yes.

4 Q. And is that where you put your garbage?

5 A. No.

6 Q. Who puts your garbage out?

7 A. My maid.

8 Q. Okay. Which brings up another question. When
9 you've been posted overseas, do you keep the house
10 open?

11 A. Yes.

12 Q. And do you have somebody come in and do
13 cleaning?

14 A. And do what?

15 Q. Do cleaning, routine housekeeping; that type of
16 thing?

17 A. Yes.

18 Q. And while you're away, then do you know whether
19 or not garbage is generated, things get thrown out?

20 A. I assume so.

21 Q. Okay. And the maid would take care of that?

22 A. That's correct.

23 Q. All right. So your being away does not stop the
24 garbage collection?

25 A. No.

1 Q. All right. What happens to garbage -- what
2 happens to your garbage once you put it out there?
3 What's supposed to happen to it?

4 A. It is supposed to be collected by the City of
5 Treasure Island.

6 Q. And how do you -- do you use like a plastic bag
7 of some kind to put the garbage in?

8 A. Yes, we do.

9 Q. All right. And have you done that for say the
10 past 10 years, 15 years?

11 A. Yes, we have.

12 Q. Okay. And then the city picks it up. And what
13 do they do with it? Do you know?

14 A. No.

15 Q. Do you know that they put it in some kind of a
16 land fill or a dump some place?

17 A. I do not.

18 Q. Okay. So you don't know where the garbage goes
19 once you throw it away?

20 A. No.

21 Q. Okay. You agree that it goes some place?

22 A. Yes.

23 Q. Do you know whether it goes to a place that is a
24 public place or private place?

25 A. I do not know.

1 Q. Would you be surprised to know it went to a
2 place where anybody can go through it?

3 A. No. I wouldn't be surprised.

4 Q. Okay. You -- in doing some research on this
5 case and listening to you today, you seem to be
6 extremely active in antidrug abuse organizations and
7 movements. Is that fair to say?

8 A. Yes.

9 Q. All right. Have you ever heard the term "war on
10 drugs"?

11 A. Yes, I have.

12 Q. What does that mean to you?

13 A. The attempt to prevent the use of drugs by
14 anybody, illegal mind altering substances.

15 Q. And that includes -- or in your mind, does that
16 include or has it included over the years tougher law
17 enforcement?

18 A. No.

19 Q. Okay. How about tougher prison sentences for
20 offenders?

21 A. No. I've never been involved in that.

22 Q. Are you aware that that's part of the war on
23 drugs?

24 A. Yes, I am.

25 Q. All right. Are you aware that as part of,

1 quote, the war on drugs, there has been a big push to
2 search the garbage of people who are suspected users
3 or dealers?

4 A. Oh, no, I'm not aware of that.

5 Q. Are you aware that prosecutors have taken the
6 position that there's no privacy interest in garbage?

7 A. I was never aware of that, no.

8 Q. Okay.

9 MR. MCGOWAN: I now have the amended complaint.
10 We don't have a 4. So we'll call this 4. This is the
11 amended complaint as your counsel pointed out. And
12 the wording of it is similar. But why don't you go
13 ahead and have a look at this, and we'll resume going
14 through it.

15 THE DEPONENT: (Deponent peruses the file.).

16 (THEREUPON, Exhibit No. 4 is marked for
17 identification.)

18 BY MR. MCGOWAN:

19 Q. You've had a chance to look at that?

20 A. Yes.

21 Q. Have you seen this before?

22 A. Yes, I have.

23 Q. Now, this particular version is I believe
24 unsworn. It's just signed by Mr. Englander. Is that
25 accurate? Do you recognize Mr. Englander's signature?

1 A. Yes.

2 Q. Let's go back to the verified complaint. Okay.

3 In paragraph 9 it says, "Recently he bragged to
4 media reporters that he has regularly trespassed
5 around the Sembler's home on Treasure Island and
6 regularly picks through their garbage."

7 What reporters did he brag to?

8 A. To my knowledge, it was Robin Guess.

9 Q. That's one. This is plural, so would the S be
10 inaccurate on that?

11 A. I'm not sure. I don't know.

12 Q. Do you know of any other reporters that he spoke
13 with?

14 A. I believe there was reporters from the St. Pete
15 Times. But I'm not sure about that.

16 Q. But you're not sure. Did you ever see any story
17 quoting him in the St. Pete Times regarding this?

18 A. Which incident?

19 Q. Well, the invasion of privacy which you've
20 characterized as his invasion of privacy, his going
21 through your trash?

22 A. That he interviewed with a reporter? Is that
23 what you're asking me?

24 Q. Well, the paragraph says that he bragged to
25 media reporters that he has regularly trespassed

1 around the Sembler's home and regularly picked through
2 the garbage. That's what is set forth in your sworn
3 complaint. So I'm trying to find out which reporters.

4 You mentioned Ms. Guess. And you think possibly
5 a St. Pete Times reporter?

6 A. Yes, uh-huh.

7 Q. But you don't know for sure?

8 A. That's correct.

9 Q. Okay. And how do you know he bragged?

10 A. Well, the definition of bragging is the
11 repetition of the -- what he did as if it were
12 something to be allotted.

13 Q. Okay. So if -- so by your definition, if
14 somebody does something good or they think is good and
15 they tell another person I did a good thing, that's
16 bragging?

17 A. Would you mind repeating that?

18 Q. Yeah. I'm just trying to understand what you
19 mean by "brag"?

20 A. Exactly what it says in the dictionary; to
21 repeat the larger self of something whether it's good
22 or bad.

23 Q. Okay. All right. Then it goes on to say, "In
24 previous years, Bradbury's antics were dismissed as
25 coming from an individual who was obsessed but

1 harmless, and the Semblers were undaunted by his
2 efforts."

3 Did you believe in previous years, previous to
4 filing this case, that Mr. Bradbury was harmless?

5 A. I was unaware of the things he had done. And so
6 therefore, I considered him harmless 'till I found
7 out.

8 Q. So as of 1996, how did you feel threatened by
9 somebody who you thought was harmless?

10 A. Because he had approached my son and my
11 daughter-in-law, because he had come to our offices,
12 because he tried to extort money from my husband,
13 because he had broken into the Straight building. All
14 of these things to me were threatening.

15 Q. Okay. But you thought he was harmless?

16 A. In the sense that I didn't think he would try to
17 attack me.

18 Q. Personally?

19 A. That is correct.

20 Q. Has he ever physically attacked you?

21 A. No.

22 Q. Are you aware of anybody he's ever physically
23 attacked?

24 A. No, I have not.

25 Q. Have you ever heard a story that he physically

1 attacked anybody?

2 A. No.

3 Q. He was asked in a deposition by your attorney
4 whether or not he raped his sister. Have you ever
5 heard that allegation?

6 A. No.

7 Q. Then it goes on to say, "In recent months
8 however, Bradbury's actions have taken a different
9 dimension becoming so dark and fringe as to outrage
10 common sensibilities."

11 Do you now believe that he is not harmless?

12 A. That's a double negative. Would you mind
13 repeating that.

14 Q. Do you still think he's harmless?

15 A. I do not.

16 Q. So you think he's harmful?

17 A. I certainly do.

18 Q. And to the point of committing an act of
19 violence?

20 A. I do.

21 Q. But you're unaware of any act of violence he's
22 ever committed?

23 A. That is correct.

24 Q. And he's never threatened, to your knowledge,
25 you or any member of your family with violence, has