

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 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 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 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.)