

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

SILVIA WILHELM,

CASE NO. 08-23363

Cooke/Bandstra

Plaintiff,

vs.

CHRIS SIMMONS,

Defendant.

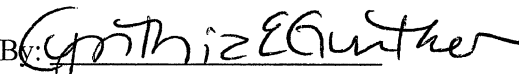
**PLAINTIFF'S NOTICE OF SERVING ANSWERS TO
DEFENDANT'S FIRST SET OF INTERROGATORIES**

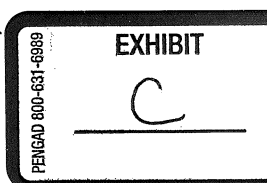
TO: OMAR ORTEGA
REY DORTA
ANDREA DE LIMA-BAEZ
DORTA & ORTEGA, P.A.
Douglas Entrance
800 S. Douglas Road, Suite 149
Coral Gables, FL 33134

PLEASE TAKE NOTICE that on this day, the 28th day of May, 2009, Plaintiff served her Answers to Defendant's First Set of Interrogatories.

Respectfully submitted,

BRUCE S. ROGOW
Florida Bar No. 067999
CYNTHIA E. GUNTHER
Florida Bar No. 0554812
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By: 
CYNTHIA E. GUNTHER
Counsel for Plaintiff



ANSWERS TO PLAINTIFF'S INTERROGATORIES.

1. Silvia Wilhelm (myself).
2. John de Leon, esq.
5975 Sunset Dr #605, Miami, Fl 33143 305 740-5347 (w) 205 778-0126
(cell)

Rep William Delahunt, (D-MA) 2454 Rayburn House Office Building,
Washington, DC 202 225-3111 (w) 617 479-5153 (cell)

Rep Jeff Flake (R-AZ) 240 Cannon House Office Building, Washington,
DC 292 225-2635 (w)

Alfredo Duran, esq. 2340 South Dixie Highway, Miami Fl 33133
305 859-2696 (w) 305 775-7616 (cell)

Uva de Aragon, Ph.D. 10426 SW 22 St, Miami ,Fl 33165 305 348-1991 (w)
786 877-9016 (cell)

Bill LeoGrande, Ph.D, Dean, School of Public Affairs, American University,
Washington, DC 202 889-2940 (w)

Raul de Velasco, M.D. 13150 SW 77 Ave. Miami, Fl 33156 305 256-3809
3. Myself.
4. **Cuban Committee for Democracy (CCD)**, Miami, Fl, Executive Director,
1996 to May 1999
Americans for Humanitarian Trade with Cuba (AHTC), Exec Director,
1999-2000
Puentes Cubanos, Miami, Fl, Executive Director (from June 1999 to present)
Cuban American Commission for Family Rights, Miami, Fl, Executive
Director, (from June of 2004 to present)
5. My duties as Executive Director of these organizations were to implement
the missions of each of them:
CCD, Mission of the organization was the promotion of "a peaceful transition
to Democracy in Cuba". Did educational work in Washington and Miami
advocating for a change of US policy towards Cuba and in Cuba advocated
for Cuban American rights and the reconciliation of the Cuban people.

Americans for Humanitarian Trade with Cuba, Mission of the organization
was to create awareness as to the detrimental effects of US policy regarding
the embargo of sales of food and medicine to Cuba.

Page Two

Puentes Cubanos, Mission of the organization “to promote knowledge, understanding, trust, and reconciliation by linking the people of the United States, Cuba, and the Cuban Diaspora.”

Cuban American Commission for Family Rights, mission of the organization Was to “educate the community and Washington as to the negative effects of the travel and remittance restrictions on Cuban families in order to facilitate the executive’s revocation of such policies”.

6. Same as above
7. Within the last ten years:
Washington Office on Latin America (WOLA) on the board 2005-2007
American Civil Liberties Union (ACLU) on the board 2007 to present
Americans for Humanitarian Trade with Cuba (Advisory Board 1998-2001)
The Time is Now Coalition (Executive Committee 2003-2005)
Emergency Network of Cuban American Scholars and Artists, member of the steering committee (Steering Committee ENCASA 2006-to present)
8. Testified in front of the House Ways and Means Committee of the US House Of Representatives, Spring of 1999

Submitted statement for the record to the Senate Judiciary Committee hearing, March 2000
9. Local TV programs
Maria Elvira Confronta (several years ago)
Oscar Haza (several years ago –one time)
Dan Rather’s special on Cuba (2008)
Jim Lehrer News Hour (2008)
As well as news spots on channels such as Univision, Telemundo, NBC, CBS
(Advocating for the right to travel to Cuba)
See attached newspaper clippings produced in file labeled No. 3 & 4 with the response to the request for production.
Copies of speeches given in the last couple of years.
10. None
11. Yes. I met Carlos Alvarez in 1962 at Catholic church gatherings in Miami at the age of 15 and was socially acquainted to him until my marriage in 1965. I did not see him again until 1997 at a board meeting of the Cuban Committee for Democracy where I served as Executive Director and the President of such, Dr. Alejandro Portes of Princeton University, had invited him as a guest

Page three

to one of our board meetings. He eventually became a board member of the CCD and I saw him sporadically in that role.

Dr. Alvarez was hired by Puentes Cubanos, Inc., in 1999 to serve as facilitator of one of our Cuba programs, dealing with conflict resolution and Cuban identity between young Cuban American professionals and their counterparts in Cuba. He traveled to the island for Puentes Cubanos multiple times as facilitator of such. Each trip lasted approximately one week. He also participated in a conflict resolution workshop at FIU North Campus and at Harvard University Kennedy School of Government.

12. The following is the information provided to the board of Puentes Cubanos by Dr. Alvarez.
Clinical Psychologist who was an Associate Professor of International and Inter Cultural Development Education at FIU and Associate Member of the Program on International Conflict Analysis and Resolution at Harvard Univ. He also maintained a part-time private practice in clinical psychology in Miami.
- 13 In June 2006 an FBI Agent left a card at my home. I telephoned the Agent and they wanted to schedule an appointment. No appointment ever occurred and no discussion was ever had with the FBI as a result of this contact.
14. Yes. In approximately 1994 or 1995 I contacted the FBI regarding a physical threat that was made against me.
15. In the last 15 years I have travel multiple times

As far as records show:

May 1994, family visit

Feb 1996, family visit

1997, family visit

1998, family visit

1999, family visit

2000, Jan 16-23, Women's Health Exchange Program

2000, May 2-6, Young Professional Exchange

2000 Oct 13-29 International Symposium on Women's Health

2001 Jan, family

2001 March, setting arrangements for women's project, Entre Nosotras

2001 April 23-28, Young Professional Exchange

2001 Oct 24-26, Entre Nosotras

2001 Nov, Young Professional Exchange

2002 April 8-13, Young Professional Exchange

2002 Dec 15-19, Boca Museum of Art, cultural program
2003 Jan 19-23, Lawyers exchange, professional program
2003 April 2-6 JCC of Boca Raton, religious
2003 Oct 22-26, JCC of Boca Raton, religious
2003 Nov 5-10, Art Institute of Chicago, cultural
Page Four

2004 Apr 28-May 4, JCC of Boca, religious
2004 Oct Medical humanitarian program with Camaguey
2005 Apr, JCC of Boca, religious
2005 Oct, JCC of Boca, religious
2006 Apr 5-10, JCC of Boca, religious
2006 Oct 31-Nov 5, JCC of Boca, religious
2007 Jan 10-15, JCC of Boca, religious
2007 Apr 17-22, JCC of Boca, religious
2007 Oct 23-28, JCC of Boca, religious
2008 Jan 22-28, JCC of Boca religious
2008 May 14-19, JCC of Boca religious
2008 Oct 28-Nov 2, JCC of Boca, religious
2009 Jan 6-13, JCC of Boca, religious
2009 April 20-26, JCC of Boca, religious

16. Half Brother, his wife, daughter, granddaughter, great grandchildren (Luis Enrique Hernandez and family, Oriente and Havana)
Rafael Guerra Teurbe Tolon and wife and child
(cousins, Havana, Cuba)
17. Not to my knowledge
18. Friends called me during the show, Tony Jimenez, Ileana Casanova (305 377-0934), Joe Garcia 202 812-1256
19. No. But I was on the show years ago.
20. I was never asked to appear on the show until after the show aired and I declined because the statements were so false and malicious that I would not dignify them by appearing.
21. The question is unintelligible. I have communicated with Government officials.
22. I have spoken to scores of Government officials in the course of my work seeking reconciliation and health care issues. I am unable to list the names, titles and addresses of all those people but the following list is my best recollection. But none of them are "agents" to the best of my knowledge.
Fernando Ramirez de Estenoz, Head of the Cuban Interest Section, DC
Dagoberto Rodriguez, Head of the Cuban Interest Section, DC
Jorge Bolanos, Head of the Cuban Interest Section, DC
Jose Cabanas, Head of DACRE (Office of Relations with Cubans Living Abroad, Ministry of Foreign Affairs, Havana, Cuba)

Benigno Perez, (same as Cabanas)
Carlos Zamora (same as Cabanas)
Ricardo Alarcon, President of the Cuban Parliament, Havana, Cuba
Miguel Alvarez, Assistant to President Alarcon, Havana, Cuba
Amado Soto, Ideologue, Cuban Communist Party, Havana, Cuba

23. Legal Fees – 2008-2009 – Bruce S. Rogow, P.A.
Loss of funding for projects.
24. Lack of foundation funding requires that we close down Puentes Cubanos at the end of this fiscal year (June 30, 2009). This will result in loss of compensation. Approximately \$2,000 per month from June 2009 into the future.
25. Emotional distress, social alienation by some members of the community and increased security concerns and cost.
26. None, husband is physician.
27. None.
28. Objection. This information is privileged and is not reasonably calculated to lead to admissible evidence in this case.
29. None.

CERTIFICATION

STATE OF Florida
COUNTY OF Broward

Under penalty of perjury, I swear or affirm that the foregoing answers are true and complete.

Silvia Wilhelm

The foregoing instrument was acknowledged before me on May 26 2009, by Silvia Wilhelm, who is personally known to me or has produced _____ as identification and who did / did not take an oath.

WITNESS my hand and official seal, this 26 day of May, 2009.

NOTARY PUBLIC-STATE OF FLORIDA
Cynthia Elizabeth Gunther
Commission # DD775800
Expires: MAY 24, 2012
BONDED THRU ATLANTIC BONDING CO., INC.

Cynthia Gunther
Notary Public
State of Florida
My Commission expires: 2012