

1 STATE OF INDIANA )  
 ) SS:  
2 COUNTY OF MONROE )  
3

4 IN THE CIRCUIT COURT OF MONROE COUNTY

5 CAUSE NO. 53C06-2203-PL-000509

6 COUNTY RESIDENTS AGAINST ANNEXATION, )  
 INC., an Indiana not for profit )  
7 corporation, et al., )  
 )  
8 Remonstrators/Appellants/Petitioners, )  
 )  
9 -vs- )  
 )  
10 THE COMMON COUNCIL of the City of )  
 Bloomington, Monroe County, Indiana, )  
11 et al., )  
 )  
12 Respondents. )  
13

14 DEPOSITION OF CHARLES DOBBS

15  
16 The deposition upon oral examination of  
17 CHARLES DOBBS, a witness produced and sworn before  
 me, Janine A. Ferren, RMR, CRR, CSR-IL No. 84-4852,  
18 Notary Public in and for the County of Hamilton,  
 State of Indiana, taken on behalf of the  
19 Respondents, at the offices of Bloomington City  
 Hall, 401 North Morton Street, Bloomington, Monroe  
20 County, Indiana, on the 1st day of March 2024,  
 scheduled to commence at 1:30 p.m., pursuant to the  
21 Indiana Rules of Trial Procedure with written  
 notice as to time and place thereof.  
22  
23  
24  
25

Page 2

1 APPEARANCES

2 FOR THE REMONSTRATORS/APPELLANTS/PETITIONERS:

3 William J. Beggs

4 BUNGER & ROBERTSON

5 211 South College Avenue

6 Bloomington, IN 47404

7 812.332.9295

8 wjbeggs@lawbr.com

9

10 FOR THE RESPONDENTS:

11 Andrew M. McNeil

12 Stephen C. Unger

13 BOSE McKINNEY & EVANS LLP

14 111 Monument Circle

15 Suite 2700

16 Indianapolis, IN 46204

17 317.684.5000

18 amcneil@boselaw.com

19 sunger@boselaw.com

20

21 ALSO PRESENT:

22 Margaret Clements

23

24

25

Page 4

1 INDEX OF EXHIBITS

2 Deposition Exhibit No.: Page

3 Exhibit 53 - Typewritten notes, "Thoughts 7

4 for deposition, Friday, March

5 1, 2024"

6

7

8 Previously Marked Exhibits: Page

9 Exhibit 28 - Amended and Supplemented 22

10 Answers of County Residents

11 Against Annexation, Inc. to

12 City of Bloomington's

13 Interrogatories

14

15

16

17

18

19

20

21

22

23

24

25

Page 3

1 INDEX OF EXAMINATION

2 Page

3 DIRECT EXAMINATION .....5

4 Questions by Andrew M. McNeil

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 5

1 (Time noted: 1:25 p.m.)

2 CHARLES DOBBS,

3 having been duly sworn to tell the truth, the whole

4 truth, and nothing but the truth relating to said

5 matter, was examined and testified as follows:

6

7 DIRECT EXAMINATION,

8 QUESTIONS BY ANDREW M. McNEIL:

9 Q Would you please state your name for the record?

10 A Charles M. Dobbs.

11 Q Mr. Dobbs, we met just before we went on the

12 record. My name is Andrew McNeil. I'm one of

13 the attorneys for the City of Bloomington in the

14 remonstrance annexation case.

15 Have you ever had the opportunity to

16 testify in a deposition before?

17 A (Shakes head.)

18 Q First rule of depositions is everything has to

19 be spoken.

20 A Oh, I'm sorry. No.

21 Q That's all right. Oral responses to my

22 questions are required so Janine, the court

23 reporter, can get an accurate transcript of

24 everything we say on the record. Does that make

25 sense?

<p style="text-align: right;">Page 6</p> <p>1 A Yes, sir.</p> <p>2 Q Your job today is to answer my questions as</p> <p>3 truthfully and completely as you can. Do you</p> <p>4 understand that?</p> <p>5 A Yes, sir.</p> <p>6 Q If you do not understand my question, will you</p> <p>7 let me know?</p> <p>8 A Absolutely.</p> <p>9 Q We're running about 30 minutes or so, but if you</p> <p>10 need to take a break for any reason, will you</p> <p>11 let me know that?</p> <p>12 A Absolutely. My doctor makes me drink a hundred</p> <p>13 ounces a day of fluid and I wasn't timing it to</p> <p>14 be here now, and I apologize, but I may have to.</p> <p>15 Q Well, just let me know and we will go off the</p> <p>16 record and accommodate you.</p> <p>17 A Thank you. I just finished a 20-ounce bottle of</p> <p>18 water, is why I say that, and I've already</p> <p>19 stopped once.</p> <p>20 Q Thanks. It's probably a good habit, though. I</p> <p>21 should drink more water.</p> <p>22 Did you do anything to prepare for the</p> <p>23 deposition today?</p> <p>24 A Yes. I put down my thoughts in writing, which</p> <p>25 is --</p>	<p style="text-align: right;">Page 8</p> <p>1 A No, sir.</p> <p>2 Q -- in Annexation Area 1A or 1B?</p> <p>3 A Don't own any other property, period.</p> <p>4 Q Your home in Baywood, is it in Area 1B?</p> <p>5 A Yes, sir.</p> <p>6 Q Do you have any plans currently to move?</p> <p>7 A No. I kid my wife regularly about it because of</p> <p>8 my arthritis, but the answer is no. She's a</p> <p>9 Bloomington girl. I met her here when I came to</p> <p>10 graduate school. We dated for ten months, got</p> <p>11 married, got done, went off to work for nearly</p> <p>12 40 years. Came back because her folks were</p> <p>13 still alive and she wanted to see them on life's</p> <p>14 last journey, which she did.</p> <p>15 Q So is that when you moved back to Bloomington?</p> <p>16 A We retired a little early. I was 64, she was</p> <p>17 61.</p> <p>18 Q You mentioned, I think, you taught history?</p> <p>19 A Yeah. This is -- probably because no one cares,</p> <p>20 but I thought I was being smart. In the spring</p> <p>21 of 1972 after Nixon had gone to China --</p> <p>22 (Stenographer clarification.)</p> <p>23 A In 1972 after Nixon went to China -- he actually</p> <p>24 went in February -- but when he went to China.</p> <p>25 I thought I'd research the history of U.S.-East</p>
<p style="text-align: right;">Page 7</p> <p>1 Q Is that Exhibit 53?</p> <p>2 A -- Exhibit 53.</p> <p>3 (Deposition Exhibit 53 marked for</p> <p>4 identification.)</p> <p>5 Q When did you create the document that's now</p> <p>6 Exhibit 53 and put your thoughts --</p> <p>7 A I typed up notes on Monday, and because I'm a</p> <p>8 freak, I edited it on Tuesday, Wednesday, and</p> <p>9 Thursday. And if you hadn't called, I might</p> <p>10 well have been editing it before I came here.</p> <p>11 Q Okay.</p> <p>12 A Not major changes because it's not grammatically</p> <p>13 correct, but ...</p> <p>14 Q Other than putting your thoughts down on paper,</p> <p>15 did you do anything else to prepare for the</p> <p>16 deposition?</p> <p>17 A No.</p> <p>18 Q What is your address?</p> <p>19 A 828 West Baywood Drive, Bloomington 47403.</p> <p>20 Q How long have you lived there?</p> <p>21 A We moved in on July 21, 2014, so nine and a half</p> <p>22 years.</p> <p>23 Q Does anyone else live there with you?</p> <p>24 A My wife, Ann.</p> <p>25 Q Do you own any other property in --</p>	<p style="text-align: right;">Page 9</p> <p>1 Asia relations from both sides, you'd be set for</p> <p>2 life with a great job. Took Chinese. Took</p> <p>3 actually Yiddish, Hebrew, Spanish, French,</p> <p>4 German, Chinese, but in different eras.</p> <p>5 And I came here because this had a renowned</p> <p>6 language department, a huge history department,</p> <p>7 and one of the best -- actually the biggest</p> <p>8 liberal arts library outside of Harvard in the</p> <p>9 country. University of Illinois has a bigger</p> <p>10 library but they have ag and engineering which</p> <p>11 Indiana does not. So if you just say arts and</p> <p>12 sciences, it's the biggest arts and sciences</p> <p>13 library. Historians live in the library. Not</p> <p>14 now, it's all online. So anyway, I came here to</p> <p>15 go to grad school and to teach.</p> <p>16 So I have five books and, I don't know,</p> <p>17 20-something articles and 400 encyclopedia</p> <p>18 entries, about a million words published.</p> <p>19 Q Where did you teach?</p> <p>20 A First Metropolitan State University, it's in</p> <p>21 downtown Denver, Colorado. If you've ever seen</p> <p>22 a shot of Mile High next to the interstate, the</p> <p>23 other side of the interstate is the campus. So</p> <p>24 if you have a class on a Monday, let's say, and</p> <p>25 the Broncos are playing Monday night, if you</p>

Page 10

1 don't get there early, they will charge you  
 2 20 bucks for your parking spot rather than a  
 3 quarter, which was the normal daytime rate.  
 4 Q Where did you teach after that?  
 5 A Iowa State University.  
 6 Q In Ames?  
 7 A Yeah. And I retired from Iowa State. So I was  
 8 about 20 years. Not on purpose, just --  
 9 Q That's just how it worked out?  
 10 A How it worked out.  
 11 Q All right. Are you full-time retired now?  
 12 A God, yes. I'm sorry, I don't care for what's  
 13 happening in -- the changes that have happened  
 14 in higher ed, students, faculty, others. I  
 15 just -- I was a dinosaur.  
 16 Q My son works at Butler in Indianapolis. We've  
 17 heard stories.  
 18 Did you sign a remonstrance petition?  
 19 A I'm not sure exactly what you're asking. Did I  
 20 go down to the county courthouse for that week  
 21 and sign something there?  
 22 Q That was an option.  
 23 A That's what I did.  
 24 Q Okay.  
 25 A So yes, I did sign a remonstrance petition.

Page 11

1 Q And did you understand that when you signed the  
 2 remonstrance petition, that you were expressing  
 3 your opposition to the annexation?  
 4 A Yes, I did.  
 5 Q Are you still opposed to the annexation?  
 6 A Yes, I am.  
 7 Q I'm going to ask you a broad question and then  
 8 we'll follow up as needed. The question is, and  
 9 talk slowly, why are you opposed to the  
 10 annexation?  
 11 A Is it okay if I sort of paraphrase?  
 12 Q Absolutely.  
 13 A Well, there are several reasons. There's one,  
 14 the mayor never made -- former mayor, excuse me.  
 15 Q Mayor Hamilton?  
 16 A Mayor Hamilton never made any effort, still  
 17 hasn't made any effort, nor has his successor,  
 18 to draw people in. And this was a habit of his,  
 19 that's the way he conducted his regime. So he  
 20 said when he announced it in the paper and  
 21 sprung it on everyone, it was rightsizing the  
 22 city. That's just jargon. That doesn't have  
 23 any meaning. What's rightsizing?  
 24 He provided no advantages for the city, no  
 25 advantages for city residents. He provided --

Page 12

1 whether there were or weren't, he provided none.  
 2 I'm talking about someone who lives in  
 3 footnotes. None for the city, none for those  
 4 being annexed.  
 5 (Stenographer clarification.)  
 6 A He said, for example, we would gain fire,  
 7 police, and water. I have fire, police, and  
 8 water and pay for them. He blamed us, as others  
 9 in this administration have blamed us, for  
 10 taking advantage of the city, when we all take  
 11 advantage of Indiana University, let's be real.  
 12 If IU could pick up and move, which I know  
 13 it can't -- it's a \$2 billion physical plant,  
 14 it's not going anywhere. But if it could, we'd  
 15 be Bedford or Martinsville. We would not have  
 16 all the students and excitement they bring, all  
 17 the entertainment, sports -- even though our  
 18 football team -- but sports, music, theater, the  
 19 Eskenazi art museum, all the things I belong to  
 20 wouldn't be here. And we'd be Bedford or  
 21 Martinsville, infinitely smaller, infinitely  
 22 less interesting, and frankly, Republican and  
 23 not Democratic, because we'd have the same  
 24 population makeup. So he was just wrong.  
 25 That was one. Never in all the times

Page 13

1 since, he's never tried to draw us in. In fact,  
 2 he's criticized us and blamed us for lots of  
 3 stuff. I don't care for that. Whatever the law  
 4 says, I believe in ethics, and he didn't have  
 5 them, to me. But it was typical of him.  
 6 When the city police bought the armored  
 7 F-150, it had bulletproof, whatever you call  
 8 them, metal on the side. At a time when there  
 9 was issues with the Black community and the  
 10 city, they didn't announce it ahead of time and  
 11 scared virtually every African American who  
 12 lives a couple blocks west of us, where we are  
 13 right now, into thinking that it was aimed at  
 14 them, which pretty much was.  
 15 With the convention center, even though it  
 16 was the Monroe County Convention Center, he  
 17 tried to take it over and negotiated separately  
 18 with hotels, and just didn't care what the  
 19 County said. Even though it was a county food,  
 20 beverage, hotel increase tax of 1 percent, I  
 21 think there's 5 or \$6 million now in the bank  
 22 because they've been collecting it and not  
 23 spending it.  
 24 MS. CLEMENTS: I can't enter into this.  
 25 THE WITNESS: Oh, sorry. Nevermind.

Page 14

1 Q You're on your own.

2 A High-speed fiber, he did the same thing. He

3 didn't go to Xfinity, not that I love Xfinity,

4 but he didn't go to them to ask them to make a

5 bid.

6 (Stenographer clarification.)

7 A He didn't go to Smithville cable and ask them to

8 make a bid. He went to a private outside

9 company, without them demonstrating just about

10 anything, like "Have you done a previous project

11 that shows you have the capacity and the

12 resources to do this in a timely fashion?"

13 Lower Cascade Road. You came up on the

14 interstate, but if you came up on Old 37, at one

15 point you can get off and ride through the old

16 old 37, and people like it. The mayor wanted to

17 close the road and everything else. There's

18 been no one who wants to do it, but he announces

19 it and it will be done.

20 Seventh Street. Ken Nunn, who advertises

21 incessantly on TV here -- you have to know who

22 he is -- even he wrote a letter to the editor

23 complaining about Seventh Street and what they

24 did with it. There's a bicycle path and it's a

25 bus lane, there's a bus there. And I have

Page 15

1 seen -- I hate to say this because I'll be 74 on

2 Monday, so when I say "old ladies," I do mean

3 older than me, but I realize to most people I'm

4 not young. But old ladies have gone down the

5 bike path in their cars because they couldn't

6 figure out which was the lane to go driving.

7 And Ken Nunn complained about it. Maybe he had

8 a case about, for all I know, of somebody.

9 Then he announced he wanted a 1 percent

10 income tax increase. Never provided an answer

11 what he'd do with the money, still hasn't. I

12 mean, "we'll improve the city and make it a

13 better place to live" is not an answer because

14 everybody in the county -- it becomes a county

15 tax. So Ellettsville did not want it at all.

16 So he just gave a raise to firefighters and

17 police and EMTs, which was a good thing to do.

18 But they didn't want the 1 percent. Unionville,

19 the same way. The county commissioners, who

20 knows?

21 And then last, because I don't want to take

22 too long, he ignored real costs. When he made

23 this announcement, county leaders came out in

24 the newspaper and said it would bust the county

25 budget. Then about the same time perhaps they

Page 16

1 talked to each other, I don't know, the school

2 board, Monroe County Community School

3 Corporation leaders said the same thing would

4 happen to their budget because of the cap on

5 property taxes and where would -- who would get

6 first dibs, as you've -- whoever figures it out.

7 Greg McKim --

8 (Stenographer clarification.)

9 A Greg McKim, who then was a county councilman, at

10 a meeting at Batchelor Middle School, which was

11 across the block from my house pretty much, so I

12 went. He said there would be a 55 percent

13 increase in our property taxes. And he had the

14 mill rates, so I'm assuming he was accurate and

15 went through everything.

16 And then it's now increased in size but it

17 used to be the Clear Creek-Perry Fire District.

18 Now I think it's the Monroe County Fire

19 District.

20 MS. CLEMENTS: I can't --

21 THE WITNESS: I know. I'm just trying to

22 remember.

23 A But anyway, the fire commissioner -- the fire

24 chief, excuse me, said that under Indiana law,

25 residents retain responsibility for bonded

Page 17

1 indebtedness even if there's a change in

2 political structure. That is, if we were taken

3 over by the City and received our fire service

4 from the City, I will still have to pay for the

5 fire stations that have outstanding bonds. And

6 I'm assuming all these people were telling the

7 truth.

8 And then private companies have said they'd

9 go out of business including, so happens, my

10 trash company, Ava's Trash Service, which is a

11 woman-owned and woman-run trash company, and so

12 I like supporting them. She said in one of the

13 bills -- because it's online, she said, "We'll

14 have to go out of business because, without the

15 residents who live in the areas threatened with

16 annexation, we can't make a budget."

17 There may be others I don't know about, but

18 there's real costs. Never tried to schmooze us.

19 Oh, and I forgot to say. In the initial

20 announcement about it, we don't get to vote in

21 the next election. Whenever the next election

22 is, if they take us over today and the next

23 election is November, for example, I can't vote

24 in it. So not only is he alienating me of my

25 property, he's alienating me of my right to

Page 18

1 vote. Nobody wants me to bore them with the  
 2 history of voting rights in the country, but he  
 3 would alienate me of my rights to vote.  
 4 For all that, I think that the city -- I've  
 5 never seen an interest group of city residents  
 6 going, "Yes, we want to annex these areas."  
 7 They don't care. And most of them --  
 8 Oh, when he announced the multi-unit  
 9 housing, that's taking a plot where there is a  
 10 single-family house and putting something extra  
 11 because we need more housing. He never tried to  
 12 win over the people in the area. So Elm  
 13 Heights --  
 14 (Stenographer clarification.)  
 15 A Elm Heights is an area just south of the  
 16 university. It used to be a pretty much faculty  
 17 neighborhood, and there's more and more student  
 18 housing there, which is typical of anyplace  
 19 that's on a periphery of a college campus. But  
 20 he just announced he was going to go allow that  
 21 there, that is, if interest can come in and buy  
 22 your house and then put up a twoplex or  
 23 fourplex, whatever -- I don't think it can be  
 24 bigger than a fourplex, that was fine.  
 25 And I exercise with a fellow who is one of

Page 19

1 the original families in Bloomington. In fact,  
 2 the street that's just west of us, that's his  
 3 family. And the other half of his family are  
 4 the Kinsers. So they've been in this town. He  
 5 lives in the house his grandfather built.  
 6 He's incensed about it, and he's a city  
 7 resident. He doesn't mind other stuff. But you  
 8 never asked, you never put it to a vote, you  
 9 never held any kind of meeting. You, the mayor,  
 10 never showed up anyplace where people could ask  
 11 you, "Why in the hell are you doing this? And  
 12 what would it take to get you to agree to stop?"  
 13 He would just make these pronouncements.  
 14 The worst of them, I shouldn't say it for  
 15 the record but I'm going to, I believe the real  
 16 reason he wanted this was the extra 16,000  
 17 residents from all the areas that are  
 18 threatened, not just 1B, would allow him to play  
 19 in a bigger group at national meetings of mayors  
 20 because we'd hit 100,000 people in the city.  
 21 And I believe that to my toes. Or if I was  
 22 writing a history of this as a historian, I  
 23 would ascribe that to be the reason, based on  
 24 what work I have. And that's my page.  
 25 Q Mr. Dobbs, did you cover all the points on your

Page 20

1 notes --  
 2 A I think so.  
 3 Q -- in Exhibit 53?  
 4 I want to kind of circle back on some of  
 5 that.  
 6 A Sure.  
 7 Q When you referenced the county budget, county  
 8 leaders said it would bust the county budget.  
 9 Is this information that you heard county  
 10 leaders say or is this something you read in the  
 11 paper?  
 12 A I read in the Herald-Times, sorry. The same  
 13 thing with the school board, if you're going to  
 14 ask that next.  
 15 Q Have you ever studied or looked at the county  
 16 budget and its sources of revenue?  
 17 A Very briefly. This is several -- I was amazed  
 18 how much less things cost here than in Iowa.  
 19 The real Midwest, the upper Midwest has a bigger  
 20 social net, and so I was paying -- my wife and I  
 21 were paying two and a half times the property  
 22 tax that we're paying here. Our homeowners  
 23 insurance was half the price. It's not that  
 24 I -- it's not that we can't afford it, and I  
 25 don't think an individual should be the key.

Page 21

1 It's -- but no, I've never sat there and gone  
 2 page by page.  
 3 Q Did you take away an understanding or a  
 4 perspective from the county leaders who  
 5 contributed to or were quoted in the article --  
 6 let me start over. That's a bad start.  
 7 Did you have any understanding from what  
 8 you read about the county or the school budget  
 9 of what amount of money would be removed from  
 10 the budget because of the annexation?  
 11 A I'm sorry, I don't remember, but the article did  
 12 say.  
 13 (Stenographer clarification.)  
 14 A The article did say how much roughly, but I  
 15 don't remember what it said.  
 16 Q You mentioned that you don't see it, for you at  
 17 least, you don't see it as an individual issue.  
 18 Are you speaking more from a policy perspective?  
 19 A I think it was done inappropriately. I don't  
 20 see how it benefits everyone -- anyone. I think  
 21 it's just carrying along on its own inertia.  
 22 It's kind of like the Vietnam War. What else  
 23 can we do? Being the city, I mean, or being  
 24 LBJ. And I can show you that in a book. I know  
 25 the author.

<p style="text-align: right;">Page 22</p> <p>1 Q I have questions for you off the record, but  2 I'll save them.  3 A Okay.  4 Q I was a history major in college.  5 A Me too.  6 (Deposition Exhibit 28 previously marked  7 for identification.)  8 Q So just for the sake of completeness, you have a  9 document in front of you that has Exhibit 28 on  10 it.  11 A This one?  12 Q Yes, the title of which is "Amended and  13 Supplemented Answers of County Residents Against  14 Annexation to City of Bloomington's  15 Interrogatories."  16 You are referenced in here, if you go to  17 page 12, question 13. So we've got to get the  18 question first. So question 13 asks the  19 responding party to "Identify and list the facts  20 and documents supporting the contention that the  21 annexation is not in the best interest of the  22 owners of land in the annexation territory" and  23 identify witnesses.  24 So then if you turn to page 13, there's a  25 supplemental answer there. Do you see your</p>	<p style="text-align: right;">Page 24</p> <p>1 A City elections.  2 Q City elections within one year of the annexation  3 being filed?  4 A No, it's the next election. So if, for  5 example -- it wouldn't happen this way, but if,  6 for example, we were annexed the day of an  7 election, which I know -- but for argument's  8 sake, if the next following election is two  9 years down the road, I can't vote in that one.  10 The first one I can vote would be four years  11 down the road.  12 Q Where did you gain that understanding?  13 A It was in the newspaper. I don't know if they  14 keep a clippings library anymore; a good paper  15 would. I mean, but all kidding aside, the  16 Herald-Times isn't what it was. No paper is.  17 Q Right.  18 A I once cited an article in the New York Times on  19 page 371, Sunday paper, 371.  20 MS. CLEMENTS: Wow.  21 Q You mentioned, was it Mr. Greg McKim talking  22 about the 55 percent increase in property taxes,  23 and you mentioned he had the mill rate so you  24 assumed he was telling the truth?  25 A Yes, yes, and yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 name, it's the --  2 A Oh, yeah.  3 Q So you've been identified as someone who, if  4 called to testify, "would be asked to testify  5 about the impact of annexation upon them and  6 their businesses."  7 Is there anything in addition to or beyond  8 what you've already testified to or what you  9 provided in your notes in Exhibit 53 that you  10 would add if you were testifying at trial,  11 beyond what you've said here today?  12 A I don't think so. I mean, the only thing I'd  13 say is, it's just personalities. I don't think  14 that's appropriate.  15 Q Have you ever reviewed the fiscal plan, the  16 annexation fiscal plan?  17 A I reviewed the plan. When you say "fiscal  18 plan," because that's where it talked about us  19 not being -- the annexed people not being able  20 to vote for like three years or four years.  21 Q The fiscal plan I'm referring to specifically is  22 a 500-or-so-page compile --  23 A No.  24 Q Now, on the right-to-vote issue, are you  25 referring to --</p>	<p style="text-align: right;">Page 25</p> <p>1 Q This was at the Batchelor --  2 A Batchelor Middle School.  3 Q Batchelor Middle School.  4 A It was like a week or two after the mayor's  5 announcement. And the fire department was there  6 in big numbers and they were handing out signs  7 you can put in your yard, but I live near the  8 end of a dead-end street so ...  9 Q What's your best recollection of when that was,  10 what month and year?  11 A It was within two weeks of the mayor making his  12 announcement, when he first broke it.  13 Q So the very first time back in 2017?  14 A Yes.  15 Q Have you done any investigation into how the  16 annexation would directly impact your property  17 tax liability?  18 A I took McKim's argument because -- for the  19 different mill rates to affect me the same as  20 anyone else. I mean, we have -- I don't know  21 about Indiana law, but in Iowa, if you own more  22 than, I think it's five acres but it might be  23 ten, it's agricultural land and the mill rate  24 drops to about zero because you don't muck with  25 ag interests in Iowa. Three million people,</p>

Page 26

1 12 million pigs; I'll just say there's things  
 2 you don't do. We have, I don't know, 7,000  
 3 square feet or something. I mean, it's not a  
 4 big plot. So I didn't pay attention to any of  
 5 those. I just assumed that they'd treat me the  
 6 same.  
 7 Q The fire district, you said the Monroe County  
 8 fire commissioner said that residents would  
 9 retain responsibility for bonded indebtedness on  
 10 fire stations and equipment.  
 11 A Yeah, so there's a fire --  
 12 Q First question.  
 13 A Oh.  
 14 Q Who is the Monroe County fire commissioner?  
 15 A The fire chief. Sorry, I shouldn't have put  
 16 "commissioner."  
 17 Q Dillard?  
 18 A I'm terrible with names. Is he chubby?  
 19 Q We'll just say the head of the Monroe Fire  
 20 Protection District.  
 21 A I mean, I'm not light, but he's chubby.  
 22 Q Okay. So you were going to explain that  
 23 comment?  
 24 A So he explained that there was several fire --  
 25 at the time there's more fire stations. Now

Page 27

1 they've combined with other areas that I haven't  
 2 paid enough attention to. But there's one on  
 3 Rhorer Road right when you come out of the  
 4 Kroger parking lot and go not quite but almost  
 5 across the street, there's one there. There's  
 6 one by Lake Monroe on the west side. And he  
 7 talking about these new buildings, and we  
 8 never -- not that this would be a huge debt, but  
 9 we would never get out from under it, and he  
 10 said that was state law.  
 11 Q You're in Perry Township; is that right?  
 12 A Yes.  
 13 Q And Perry Township is part of the Fire  
 14 Protection District?  
 15 A Yeah.  
 16 Q Did you understand that if the annexation were  
 17 to go through, that the fire district would  
 18 continue to be the primary fire provider for  
 19 your --  
 20 A Honestly, after the mayor made the announcement,  
 21 not the week after but within a couple of weeks,  
 22 there was an open house in this building, the  
 23 only other time I've been here, down in the main  
 24 floor. And the unit heads were there and talked  
 25 about how they would deal with us. I mean, they

Page 28

1 were aiming it at the annexees. And the fire  
 2 chief was there talking about him taking over,  
 3 because our fire people are trained.  
 4 I said, "Ours have to be, too, or else I  
 5 wouldn't be getting the fire insurance rate I'm  
 6 getting from USAA, that I wasn't getting in Iowa  
 7 with a city fire department." And that sort of  
 8 stopped him and I didn't know what else to ask.  
 9 Q Was this also in 2017?  
 10 A Yeah. That was also when the -- by the way, I  
 11 like that because I want this on the record, the  
 12 then-corporation counsel for the City lied. She  
 13 said this is typical of states across the  
 14 country, that is, you can annex land without  
 15 needing approval or permission from the  
 16 annexees. Four states, not 50, and she lied.  
 17 Q Is that Philippa Guthrie?  
 18 A Yes.  
 19 Q Are you aware of any changes to the law with  
 20 respect to fire protection districts and  
 21 annexation territories since 2017?  
 22 A If it occurred, it wasn't covered in the  
 23 Herald-Times. But then again, a lot's not  
 24 covered.  
 25 Q Is there anything else, if you were testifying

Page 29

1 at a trial to express your opposition to the  
 2 annexation, that you would provide that you  
 3 haven't provided?  
 4 A Other than I might remember one more example of  
 5 him running roughshod over people, but I thought  
 6 that was enough.  
 7 Q But nothing of a different kind?  
 8 A No. I wouldn't do -- it would just be backing  
 9 up.  
 10 MR. McNEIL: Mr. Dobbs, I have no further  
 11 questions.  
 12 MR. BEGGS: No questions. Thank you very  
 13 much.  
 14 (Time noted: 1:56 p.m.)  
 15 AND FURTHER THE DEPONENT SAITH NOT.  
 16  
 17  
 18  
 19 \_\_\_\_\_  
 20 CHARLES DOBBS  
 21  
 22  
 23  
 24  
 25





1 DEPOSITION REVIEW  
 CERTIFICATION OF WITNESS

2 ASSIGNMENT REFERENCE NO: 6465811

3 CASE NAME: County Residents Against Annexation, Inc., Et Al.  
 v. The Common Council Of The City Of Bloomington, Monroe County,  
 Indiana, Et Al.

4 DATE OF DEPOSITION: 3/1/2024

5 WITNESS' NAME: Charles Dobbs

6 In accordance with the Rules of Civil  
 Procedure, I have read the entire transcript of  
 my testimony or it has been read to me.

7 I have listed my changes on the attached  
 Errata Sheet, listing page and line numbers as  
 8 well as the reason(s) for the change(s).

9 I request that these changes be entered  
 as part of the record of my testimony.

10

11 I have executed the Errata Sheet, as well  
 as this Certificate, and request and authorize  
 that both be appended to the transcript of my  
 12 testimony and be incorporated therein.

13 \_\_\_\_\_  
 Date Charles Dobbs

14

15 Sworn to and subscribed before me, a  
 Notary Public in and for the State and County,  
 the referenced witness did personally appear  
 16 and acknowledge that:

17 They have read the transcript;  
 They have listed all of their corrections  
 18 in the appended Errata Sheet;

19 They signed the foregoing Sworn  
 Statement; and

20 Their execution of this Statement is of  
 their free act and deed.

21 I have affixed my name and official seal  
 22 this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

23 \_\_\_\_\_  
 Notary Public

24 \_\_\_\_\_  
 Commission Expiration Date

25

1 ERRATA SHEET

2 VERITEXT LEGAL SOLUTIONS MIDWEST

3 ASSIGNMENT NO: 3/1/2024

4 PAGE/LINE(S) / CHANGE /REASON

5 \_\_\_\_\_

6 \_\_\_\_\_

7 \_\_\_\_\_

8 \_\_\_\_\_

9 \_\_\_\_\_

10 \_\_\_\_\_

11 \_\_\_\_\_

12 \_\_\_\_\_

13 \_\_\_\_\_

14 \_\_\_\_\_

15 \_\_\_\_\_

16 \_\_\_\_\_

17 \_\_\_\_\_

18 \_\_\_\_\_

19 \_\_\_\_\_

20 \_\_\_\_\_  
 Date Charles Dobbs

21 SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_

22 DAY OF \_\_\_\_\_, 20\_\_\_\_ .

23 \_\_\_\_\_  
 Notary Public

24 \_\_\_\_\_  
 Commission Expiration Date

25

<b>&amp;</b>	32:4	<b>6</b>	<b>actually</b> 8:23 9:3,7
<b>&amp;</b> 2:3,9	<b>21</b> 7:21	<b>6</b> 13:21	<b>add</b> 23:10
<b>0</b>	<b>211</b> 2:4	<b>61</b> 8:17	<b>addition</b> 23:7
<b>000509</b> 1:4	<b>21167</b> 31:8	<b>64</b> 8:16	<b>address</b> 7:18
<b>1</b>	<b>216-523-1313</b>	<b>6465811</b> 32:8 33:2 34:2	<b>administration</b> 12:9
<b>1</b> 4:4 13:20 15:9,18	32:3	<b>7</b>	<b>advantage</b> 12:10,11
<b>100,000</b> 19:20	<b>22</b> 4:9 31:12	<b>7</b> 4:3	<b>advantages</b> 11:24,25
<b>1100</b> 32:1	<b>2700</b> 2:10	<b>7,000</b> 26:2	<b>advertises</b> 14:20
<b>111</b> 2:10	<b>28</b> 4:9 22:6,9	<b>74</b> 15:1	<b>affect</b> 25:19
<b>12</b> 22:17 26:1	<b>3</b>	<b>8</b>	<b>affixed</b> 31:4 33:15 34:21
<b>13</b> 22:17,18,24	<b>3/1/2024</b> 32:9 33:3 34:3 35:2	<b>812.332.9295</b> 2:5	<b>afford</b> 20:24
<b>15</b> 32:4	<b>30</b> 6:9	<b>828</b> 7:19	<b>aforemention...</b> 30:8,22
<b>150</b> 13:7	<b>317.684.5000</b> 2:11	<b>84-4852</b> 1:17	<b>african</b> 13:11
<b>15th</b> 31:4	<b>37</b> 14:14,16	<b>a</b>	<b>ag</b> 9:10 25:25
<b>16,000</b> 19:16	<b>371</b> 24:19,19	<b>able</b> 23:19	<b>agree</b> 19:12
<b>1820</b> 32:2	<b>4</b>	<b>above</b> 32:11	<b>agricultural</b> 25:23
<b>1972</b> 8:21,23	<b>40</b> 8:12	<b>absolutely</b> 6:8 6:12 11:12	<b>ahead</b> 13:10
<b>1:25</b> 5:1 30:13	<b>400</b> 9:17	<b>accommodate</b> 6:16	<b>aimed</b> 13:13
<b>1:30</b> 1:20	<b>401</b> 1:19 30:11	<b>accomplish</b> 32:16	<b>aiming</b> 28:1
<b>1:56</b> 29:14	<b>44114</b> 32:2	<b>accordance</b> 33:5 34:5	<b>al</b> 1:7,11 32:6,7 33:3,3 34:3,3
<b>1a</b> 8:2	<b>46204</b> 2:11	<b>accurate</b> 5:23 16:14	<b>alienate</b> 18:3
<b>1b</b> 8:2,4 19:18	<b>47403</b> 7:19	<b>acknowledge</b> 33:11 34:16	<b>alienating</b> 17:24,25
<b>1st</b> 1:19 30:12	<b>47404</b> 2:4	<b>acres</b> 25:22	<b>alive</b> 8:13
<b>2</b>	<b>5</b>	<b>act</b> 33:14 34:20	<b>allow</b> 18:20 19:18
<b>2</b> 12:13	<b>5</b> 3:3 13:21	<b>action</b> 30:24 31:1	
<b>20</b> 6:17 9:17 10:2,8 33:16 34:22 35:22	<b>50</b> 28:16		
<b>2014</b> 7:21	<b>500</b> 23:22		
<b>2017</b> 25:13 28:9,21	<b>53</b> 4:3 7:1,2,3,6 20:3 23:9		
<b>2024</b> 1:19 4:4 30:13 31:5,12	<b>53c06-2203</b> 1:4		
	<b>55</b> 16:12 24:22		

<p><b>amazed</b> 20:17  <b>amcneil</b> 2:12  <b>amended</b> 4:9  22:12  <b>american</b> 13:11  <b>ames</b> 10:6  <b>amount</b> 21:9  <b>andrew</b> 2:8 3:3  5:8,12  <b>ann</b> 7:24  <b>annex</b> 18:6  28:14  <b>annexation</b> 1:6  4:10 5:14 8:2  11:3,5,10  17:16 21:10  22:14,21,22  23:5,16 24:2  25:16 27:16  28:21 29:2  32:6 33:3 34:3  <b>annexed</b> 12:4  23:19 24:6  <b>annexees</b> 28:1  28:16  <b>announce</b>  13:10  <b>announced</b>  11:20 15:9  18:8,20  <b>announcement</b>  15:23 17:20  25:5,12 27:20  <b>announces</b>  14:18</p>	<p><b>answer</b> 6:2 8:8  15:10,13 22:25  <b>answers</b> 4:9  22:13  <b>anymore</b> 24:14  <b>anyplace</b> 18:18  19:10  <b>anyway</b> 9:14  16:23  <b>apologize</b> 6:14  <b>appear</b> 33:11  34:15  <b>appearances</b>  2:1  <b>appellants</b> 1:8  2:2  <b>appended</b>  34:11,18  <b>appropriate</b>  23:14  <b>approval</b> 28:15  <b>april</b> 31:12  <b>area</b> 8:2,4  18:12,15  <b>areas</b> 17:15  18:6 19:17  27:1  <b>argument</b>  25:18  <b>argument's</b>  24:7  <b>armored</b> 13:6  <b>arrangements</b>  32:15</p>	<p><b>art</b> 12:19  <b>arthritis</b> 8:8  <b>article</b> 21:5,11  21:14 24:18  <b>articles</b> 9:17  <b>arts</b> 9:8,11,12  <b>ascribe</b> 19:23  <b>asia</b> 9:1  <b>aside</b> 24:15  <b>asked</b> 19:8 23:4  <b>asking</b> 10:19  <b>asks</b> 22:18  <b>assignment</b>  33:2 34:2 35:2  <b>assumed</b> 24:24  26:5  <b>assuming</b> 16:14  17:6  <b>attached</b> 34:7  <b>attention</b> 26:4  27:2  <b>attorney</b> 30:25  <b>attorneys</b> 5:13  31:2  <b>author</b> 21:25  <b>authorize</b>  34:11  <b>ava's</b> 17:10  <b>available</b> 32:13  <b>ave</b> 32:1  <b>avenue</b> 2:4  <b>aware</b> 28:19</p>	<p style="text-align: center;"><b>b</b></p> <p><b>back</b> 8:12,15  20:4 25:13  <b>backing</b> 29:8  <b>bad</b> 21:6  <b>bank</b> 13:21  <b>based</b> 19:23  <b>batchelor</b>  16:10 25:1,2,3  <b>baywood</b> 7:19  8:4  <b>bedford</b> 12:15  12:20  <b>beggs</b> 2:3 29:12  32:5  <b>behalf</b> 1:18  30:10  <b>believe</b> 13:4  19:15,21  <b>belong</b> 12:19  <b>benefits</b> 21:20  <b>best</b> 9:7 22:21  25:9  <b>better</b> 15:13  <b>beverage</b> 13:20  <b>beyond</b> 23:7,11  <b>bicycle</b> 14:24  <b>bid</b> 14:5,8  <b>big</b> 25:6 26:4  <b>bigger</b> 9:9  18:24 19:19  20:19  <b>biggest</b> 9:7,12  <b>bike</b> 15:5</p>
--	--	---	---

<p><b>billion</b> 12:13  <b>bills</b> 17:13  <b>black</b> 13:9  <b>blamed</b> 12:8,9  13:2  <b>block</b> 16:11  <b>blocks</b> 13:12  <b>bloomington</b>  1:10,18,19 2:4  5:13 7:19 8:9  8:15 19:1  30:11,12 32:6  33:3 34:3  <b>bloomington's</b>  4:10 22:14  <b>board</b> 16:2  20:13  <b>bonded</b> 16:25  26:9  <b>bonds</b> 17:5  <b>book</b> 21:24  <b>books</b> 9:16  <b>bore</b> 18:1  <b>bose</b> 2:9  <b>boselaw.com</b>  2:12,12  <b>bottle</b> 6:17  <b>bought</b> 13:6  <b>break</b> 6:10  <b>briefly</b> 20:17  <b>bring</b> 12:16  <b>broad</b> 11:7  <b>broke</b> 25:12  <b>broncos</b> 9:25</p>	<p><b>bucks</b> 10:2  <b>budget</b> 15:25  16:4 17:16  20:7,8,16 21:8  21:10  <b>building</b> 27:22  <b>buildings</b> 27:7  <b>built</b> 19:5  <b>bulletproof</b>  13:7  <b>bunger</b> 2:3  <b>bus</b> 14:25,25  <b>business</b> 17:9  17:14  <b>businesses</b> 23:6  <b>bust</b> 15:24 20:8  <b>butler</b> 10:16  <b>buy</b> 18:21</p>	<p><b>case</b> 5:14 15:8  32:6 33:3 34:3  <b>cause</b> 1:4 30:24  <b>center</b> 13:15,16  <b>certificate</b>  34:11  <b>certification</b>  33:1 34:1  <b>certified</b> 32:16  <b>certify</b> 30:5,23  <b>change</b> 17:1  34:8 35:3  <b>changes</b> 7:12  10:13 28:19  33:7 34:7,9  <b>charge</b> 10:1  <b>charles</b> 1:14,16  5:2,10 29:19  30:5 32:9 33:4  33:9 34:4,13  35:20  <b>chief</b> 16:24  26:15 28:2  <b>china</b> 8:21,23  8:24  <b>chinese</b> 9:2,4  <b>chubby</b> 26:18  26:21  <b>circle</b> 2:10 20:4  <b>circuit</b> 1:3  <b>cited</b> 24:18  <b>city</b> 1:10,18  4:10 5:13  11:22,24,25  12:3,10 13:6</p>	<p>13:10 15:12  17:3,4 18:4,5  19:6,20 21:23  22:14 24:1,2  28:7,12 30:11  32:6 33:3 34:3  <b>civil</b> 33:5 34:5  <b>clarification</b>  8:22 12:5 14:6  16:8 18:14  21:13  <b>class</b> 9:24  <b>clear</b> 16:17  <b>clements</b> 2:15  13:24 16:20  24:20  <b>cleveland</b> 32:2  <b>clippings</b> 24:14  <b>close</b> 14:17  <b>collecting</b>  13:22  <b>college</b> 2:4  18:19 22:4  <b>colorado</b> 9:21  <b>combined</b> 27:1  <b>come</b> 18:21  27:3  <b>commence</b> 1:20  <b>commencing</b>  30:13  <b>comment</b> 26:23  <b>commission</b>  31:11,13 33:19  34:25 35:25</p>
	<p style="text-align: center;"><b>c</b></p> <p><b>c</b> 2:9  <b>ca</b> 32:25  <b>cable</b> 14:7  <b>call</b> 13:7 32:14  <b>called</b> 7:9 23:4  <b>campus</b> 9:23  18:19  <b>cap</b> 16:4  <b>capacity</b> 14:11  <b>care</b> 10:12 13:3  13:18 18:7  <b>cares</b> 8:19  <b>carrying</b> 21:21  <b>cars</b> 15:5  <b>cascade</b> 14:13</p>		

<b>commissioner</b> 16:23 26:8,14 26:16 <b>commissioners</b> 15:19 <b>common</b> 1:10 32:6 33:3 34:3 <b>community</b> 13:9 16:2 <b>companies</b> 17:8 <b>company</b> 14:9 17:10,11 <b>compile</b> 23:22 <b>complained</b> 15:7 <b>complaining</b> 14:23 <b>completed</b> 32:13 <b>completely</b> 6:3 <b>completeness</b> 22:8 <b>conducted</b> 11:19 <b>contention</b> 22:20 <b>continue</b> 27:18 <b>contributed</b> 21:5 <b>convenient</b> 32:15 <b>convention</b> 13:15,16 <b>corporation</b> 1:7 16:3 28:12	<b>correct</b> 7:13 <b>corrections</b> 34:17 <b>cost</b> 20:18 <b>costs</b> 15:22 17:18 <b>council</b> 1:10 32:6 33:3 34:3 <b>councilman</b> 16:9 <b>counsel</b> 28:12 30:22 <b>country</b> 9:9 18:2 28:14 <b>county</b> 1:2,3,6 1:10,17,19 4:9 10:20 13:16,19 13:19 15:14,14 15:19,23,24 16:2,9,18 20:7 20:7,8,9,15 21:4,8 22:13 26:7,14 30:2,4 30:12 31:13 32:6,6 33:3,3 33:10 34:3,3 34:15 <b>couple</b> 13:12 27:21 <b>court</b> 1:3 5:22 33:7 <b>courthouse</b> 10:20 <b>cover</b> 19:25	<b>covered</b> 28:22 28:24 <b>create</b> 7:5 <b>creek</b> 16:17 <b>criticized</b> 13:2 <b>crr</b> 1:17 <b>csr</b> 1:17 <b>currently</b> 8:6 <b>d</b> <b>date</b> 32:9 33:3 33:9,19 34:3 34:13,25 35:20 35:25 <b>dated</b> 8:10 <b>day</b> 1:19 6:13 24:6 30:12 31:5 33:16 34:22 35:22 <b>days</b> 32:18 <b>daytime</b> 10:3 <b>dead</b> 25:8 <b>deal</b> 27:25 <b>dear</b> 32:10 <b>debt</b> 27:8 <b>deed</b> 33:14 34:20 <b>deemed</b> 32:20 <b>democratic</b> 12:23 <b>demonstrating</b> 14:9 <b>denver</b> 9:21 <b>department</b> 9:6 9:6 25:5 28:7 32:23	<b>deponent</b> 29:15 30:6,19,19 <b>deposition</b> 1:14 1:16 4:2,3 5:16 6:23 7:3,16 22:6 30:9,15 32:9,11 33:1,3 34:1,3 <b>depositions</b> 5:18 <b>dibs</b> 16:6 <b>different</b> 9:4 25:19 29:7 <b>dillard</b> 26:17 <b>dinosaur</b> 10:15 <b>direct</b> 3:3 5:7 <b>direction</b> 30:17 <b>directly</b> 25:16 <b>disinterested</b> 30:23 <b>district</b> 16:17 16:19 26:7,20 27:14,17 <b>districts</b> 28:20 <b>dobbs</b> 1:14,16 5:2,10,11 19:25 29:10,19 30:5 32:9 33:4 33:9 34:4,13 35:20 <b>doctor</b> 6:12 <b>document</b> 7:5 22:9 <b>documents</b> 22:20
---	--	--	---

<p><b>doing</b> 19:11  <b>downtown</b> 9:21  <b>draw</b> 11:18              13:1  <b>drink</b> 6:12,21  <b>drive</b> 7:19  <b>driving</b> 15:6  <b>drops</b> 25:24  <b>duly</b> 5:3 30:6</p>	<p><b>entire</b> 33:5 34:5  <b>entries</b> 9:18  <b>equipment</b>              26:10  <b>eras</b> 9:4  <b>errata</b> 32:18              34:7,10,18              35:1  <b>eskenazi</b> 12:19  <b>esq</b> 32:5  <b>et</b> 1:7,11 32:6,6              33:3,3 34:3,3  <b>ethics</b> 13:4  <b>evans</b> 2:9  <b>event</b> 31:1  <b>everybody</b>              15:14  <b>exactly</b> 10:19  <b>examination</b>              1:16 3:1,3 5:7  <b>examined</b> 5:5  <b>example</b> 12:6              17:23 24:5,6              29:4  <b>excitement</b>              12:16  <b>excuse</b> 11:14              16:24  <b>executed</b> 34:10  <b>execution</b>              33:14 34:19  <b>exercise</b> 18:25  <b>exhibit</b> 4:2,3,9              7:1,2,3,6 20:3              22:6,9 23:9</p>	<p><b>exhibits</b> 4:1,8  <b>expiration</b>              33:19 34:25              35:25  <b>expires</b> 31:11  <b>explain</b> 26:22  <b>explained</b>              26:24  <b>express</b> 29:1  <b>expressing</b> 11:2  <b>expressly</b> 32:13  <b>extra</b> 18:10              19:16</p>	<p><b>fire</b> 12:6,7              16:17,18,23,23              17:3,5 25:5              26:7,8,10,11,14              26:15,19,24,25              27:13,17,18              28:1,3,5,7,20  <b>firefighters</b>              15:16  <b>first</b> 5:18 9:20              16:6 22:18              24:10 25:12,13              26:12 30:6  <b>fiscal</b> 23:15,16              23:17,21  <b>five</b> 9:16 25:22  <b>floor</b> 27:24  <b>fluid</b> 6:13  <b>folks</b> 8:12  <b>follow</b> 11:8  <b>following</b> 24:8  <b>follows</b> 5:5  <b>food</b> 13:19  <b>football</b> 12:18  <b>footnotes</b> 12:3  <b>foregoing</b> 30:9              33:13 34:18  <b>forgot</b> 17:19  <b>former</b> 11:14  <b>four</b> 23:20              24:10 28:16  <b>fourplex</b> 18:23              18:24  <b>frankly</b> 12:22</p>
<p><b>e</b></p>			
<p><b>early</b> 8:16 10:1  <b>east</b> 8:25  <b>ed</b> 10:14  <b>edited</b> 7:8  <b>editing</b> 7:10  <b>editor</b> 14:22  <b>effort</b> 11:16,17  <b>election</b> 17:21              17:21,23 24:4              24:7,8  <b>elections</b> 24:1,2  <b>ellettsville</b>              15:15  <b>elm</b> 18:12,15  <b>employ</b> 31:2  <b>emts</b> 15:17  <b>encyclopedia</b>              9:17  <b>engineering</b>              9:10  <b>enter</b> 13:24  <b>entered</b> 34:9  <b>entertainment</b>              12:17</p>			
		<p><b>f</b></p>	
		<p><b>f</b> 13:7  <b>fact</b> 13:1 19:1  <b>facts</b> 22:19  <b>faculty</b> 10:14              18:16  <b>families</b> 19:1  <b>family</b> 18:10              19:3,3  <b>fashion</b> 14:12  <b>february</b> 8:24  <b>feet</b> 26:3  <b>fellow</b> 18:25  <b>ferren</b> 1:17              30:3 31:9,13  <b>fiber</b> 14:2  <b>figure</b> 15:6  <b>figures</b> 16:6  <b>filed</b> 24:3  <b>fine</b> 18:24  <b>finished</b> 6:17</p>	

<p><b>freak</b> 7:8  <b>free</b> 33:14  34:20  <b>french</b> 9:3  <b>friday</b> 4:3  <b>front</b> 22:9  <b>full</b> 10:11  <b>further</b> 29:10  29:15 30:23</p>	<p><b>greg</b> 16:7,9  24:21  <b>group</b> 18:5  19:19  <b>guthrie</b> 28:17</p>	<p><b>hell</b> 19:11  <b>herald</b> 20:12  24:16 28:23  <b>hereunto</b> 31:3  <b>high</b> 9:22 14:2  <b>higher</b> 10:14  <b>historian</b> 19:22  <b>historians</b> 9:13  <b>history</b> 8:18,25  9:6 18:2 19:22  22:4  <b>hit</b> 19:20  <b>home</b> 8:4  <b>homeowners</b>  20:22  <b>honestly</b> 27:20  <b>hotel</b> 13:20  <b>hotels</b> 13:18  <b>hour</b> 30:13  <b>house</b> 16:11  18:10,22 19:5  27:22  <b>housing</b> 18:9  18:11,18  <b>huge</b> 9:6 27:8  <b>hundred</b> 6:12</p>	<p><b>illinois</b> 9:9  <b>impact</b> 23:5  25:16  <b>improve</b> 15:12  <b>inappropriately</b>  21:19  <b>incensed</b> 19:6  <b>incessantly</b>  14:21  <b>including</b> 17:9  <b>income</b> 15:10  <b>incorporated</b>  34:12  <b>increase</b> 13:20  15:10 16:13  24:22  <b>increased</b>  16:16  <b>indebtedness</b>  17:1 26:9  <b>index</b> 3:1 4:1  <b>indiana</b> 1:1,6  1:10,18,19,20  9:11 12:11  16:24 25:21  30:1,4,12,14  31:12 32:6  33:3 34:3</p>
<p><b>g</b></p>	<p><b>h</b></p>	<p><b>i</b></p>	<p><b>indianapolis</b>  2:11 10:16  <b>individual</b>  20:25 21:17  <b>inertia</b> 21:21  <b>infinitely</b> 12:21  12:21</p>
<p><b>gain</b> 12:6 24:12  <b>german</b> 9:4  <b>getting</b> 28:5,6,6  <b>girl</b> 8:9  <b>given</b> 30:18  <b>go</b> 6:15 9:15  10:20 14:3,4,7  15:6 17:9,14  18:20 22:16  27:4,17  <b>god</b> 10:12  <b>going</b> 11:7  12:14 18:6,20  19:15 20:13  26:22  <b>good</b> 6:20  15:17 24:14  <b>grad</b> 9:15  <b>graduate</b> 8:10  <b>grammatically</b>  7:12  <b>grandfather</b>  19:5  <b>great</b> 9:2</p>	<p><b>habit</b> 6:20  11:18  <b>half</b> 7:21 19:3  20:21,23  <b>hall</b> 1:19 30:11  <b>hamilton</b> 1:17  11:15,16 30:2  30:4 31:13  <b>hand</b> 31:4  <b>handing</b> 25:6  <b>happen</b> 16:4  24:5  <b>happened</b>  10:13  <b>happening</b>  10:13  <b>happens</b> 17:9  <b>harvard</b> 9:8  <b>hate</b> 15:1  <b>head</b> 5:17  26:19  <b>heads</b> 27:24  <b>heard</b> 10:17  20:9  <b>hebrew</b> 9:3  <b>heights</b> 18:13  18:15  <b>held</b> 19:9</p>	<p><b>identification</b>  7:4 22:7  <b>identified</b> 23:3  <b>identify</b> 22:19  22:23  <b>ignored</b> 15:22  <b>il</b> 1:17</p>	<p><b>illinois</b> 9:9  <b>impact</b> 23:5  25:16  <b>improve</b> 15:12  <b>inappropriately</b>  21:19  <b>incensed</b> 19:6  <b>incessantly</b>  14:21  <b>including</b> 17:9  <b>income</b> 15:10  <b>incorporated</b>  34:12  <b>increase</b> 13:20  15:10 16:13  24:22  <b>increased</b>  16:16  <b>indebtedness</b>  17:1 26:9  <b>index</b> 3:1 4:1  <b>indiana</b> 1:1,6  1:10,18,19,20  9:11 12:11  16:24 25:21  30:1,4,12,14  31:12 32:6  33:3 34:3  <b>indianapolis</b>  2:11 10:16  <b>individual</b>  20:25 21:17  <b>inertia</b> 21:21  <b>infinitely</b> 12:21  12:21</p>



<p><b>information</b> 20:9  <b>initial</b> 17:19  <b>insurance</b> 20:23 28:5  <b>interest</b> 18:5,21 22:21  <b>interested</b> 31:1  <b>interesting</b> 12:22  <b>interests</b> 25:25  <b>interrogatories</b> 4:11 22:15  <b>interstate</b> 9:22 9:23 14:14  <b>investigation</b> 25:15  <b>iowa</b> 10:5,7 20:18 25:21,25 28:6  <b>issue</b> 21:17 23:24  <b>issues</b> 13:9  <b>iu</b> 12:12</p>	<p><b>k</b></p> <p><b>keep</b> 24:14  <b>ken</b> 14:20 15:7  <b>key</b> 20:25  <b>kid</b> 8:7  <b>kidding</b> 24:15  <b>kind</b> 19:9 20:4 21:22 29:7  <b>kinsers</b> 19:4  <b>know</b> 6:7,11,15 9:16 12:12 14:21 15:8 16:1,21 17:17 21:24 24:7,13 25:20 26:2 28:8  <b>knows</b> 15:20  <b>kroger</b> 27:4</p>	<p><b>legal</b> 32:1 35:1  <b>letter</b> 14:22 32:19  <b>liability</b> 25:17  <b>liberal</b> 9:8  <b>library</b> 9:8,10 9:13,13 24:14  <b>lied</b> 28:12,16  <b>life</b> 9:2  <b>life's</b> 8:13  <b>light</b> 26:21  <b>line</b> 34:7 35:3  <b>list</b> 22:19  <b>listed</b> 34:7,17  <b>listing</b> 34:7  <b>little</b> 8:16  <b>live</b> 7:23 9:13 15:13 17:15 25:7  <b>lived</b> 7:20  <b>lives</b> 12:2 13:12 19:5  <b>llp</b> 2:9  <b>location</b> 32:15  <b>long</b> 7:20 15:22  <b>looked</b> 20:15  <b>lot</b> 27:4  <b>lot's</b> 28:23  <b>lots</b> 13:2  <b>love</b> 14:3  <b>lower</b> 14:13</p>	<p><b>madam</b> 32:10  <b>made</b> 11:14,16 11:17 15:22 27:20 33:7  <b>main</b> 27:23  <b>major</b> 7:12 22:4  <b>make</b> 5:24 14:4 14:8 15:12 17:16 19:13 32:15  <b>makes</b> 6:12  <b>makeup</b> 12:24  <b>making</b> 25:11  <b>march</b> 1:19 4:3 30:13 31:5 32:4  <b>margaret</b> 2:15  <b>marked</b> 4:8 7:3 22:6  <b>married</b> 8:11  <b>martinsville</b> 12:15,21  <b>matter</b> 5:5 30:8 32:12  <b>mayor</b> 11:14,14 11:15,16 14:16 19:9 25:11 27:20  <b>mayor's</b> 25:4  <b>mayors</b> 19:19  <b>mckim</b> 16:7,9 24:21  <b>mckim's</b> 25:18</p>
<p><b>j</b></p>	<p><b>l</b></p> <p><b>ladies</b> 15:2,4  <b>lake</b> 27:6  <b>land</b> 22:22 25:23 28:14  <b>lane</b> 14:25 15:6  <b>language</b> 9:6  <b>large</b> 30:5  <b>law</b> 13:3 16:24 25:21 27:10 28:19  <b>lawbr.com</b> 2:5  <b>lbj</b> 21:24  <b>leaders</b> 15:23 16:3 20:8,10 21:4</p>	<p><b>m</b></p>	
<p><b>j</b> 2:3 32:5  <b>janine</b> 1:17 5:22 30:3 31:9 31:13  <b>jargon</b> 11:22  <b>job</b> 6:2 9:2  <b>journey</b> 8:14  <b>july</b> 7:21</p>	<p><b>m</b> 2:8 3:3 5:8 5:10</p>		

<p><b>mckinney</b> 2:9  <b>mcneil</b> 2:8 3:3  5:8,12 29:10  <b>mean</b> 15:2,12  21:23 23:12  24:15 25:20  26:3,21 27:25  <b>meaning</b> 11:23  <b>meeting</b> 16:10  19:9  <b>meetings</b> 19:19  <b>mentioned</b> 8:18  21:16 24:21,23  <b>met</b> 5:11 8:9  <b>metal</b> 13:8  <b>metropolitan</b>  9:20  <b>middle</b> 16:10  25:2,3  <b>midwest</b> 20:19  20:19 35:1  <b>mile</b> 9:22  <b>mill</b> 16:14  24:23 25:19,23  <b>million</b> 9:18  13:21 25:25  26:1  <b>mind</b> 19:7  <b>minutes</b> 6:9  <b>monday</b> 7:7  9:24,25 15:2  <b>money</b> 15:11  21:9  <b>monroe</b> 1:2,3  1:10,19 13:16</p>	<p>16:2,18 26:7  26:14,19 27:6  30:12 32:6  33:3 34:3  <b>month</b> 25:10  <b>months</b> 8:10  <b>monument</b>  2:10  <b>morton</b> 1:19  30:11  <b>move</b> 8:6 12:12  <b>moved</b> 7:21  8:15  <b>muck</b> 25:24  <b>multi</b> 18:8  <b>museum</b> 12:19  <b>music</b> 12:18</p> <p style="text-align: center;"><b>n</b></p> <p><b>name</b> 5:9,12  23:1 32:6 33:3  33:4,15 34:3,4  34:21  <b>names</b> 26:18  <b>national</b> 19:19  <b>near</b> 25:7  <b>nearly</b> 8:11  <b>need</b> 6:10 18:11  <b>needed</b> 11:8  <b>needing</b> 28:15  <b>negotiated</b>  13:17  <b>neighborhood</b>  18:17  <b>net</b> 20:20</p>	<p><b>never</b> 11:14,16  12:25 13:1  15:10 17:18  18:5,11 19:8,8  19:9,10 21:1  27:8,9  <b>nevermind</b>  13:25  <b>new</b> 24:18 27:7  <b>newspaper</b>  15:24 24:13  <b>night</b> 9:25  <b>nine</b> 7:21  <b>nixon</b> 8:21,23  <b>normal</b> 10:3  <b>north</b> 1:19  30:11  <b>notarial</b> 31:4  <b>notary</b> 1:17  30:3 31:11  32:25 33:10,18  34:15,23 35:23  <b>noted</b> 5:1 29:14  <b>notes</b> 4:3 7:7  20:1 23:9  <b>notice</b> 1:21  <b>november</b>  17:23  <b>np0681591</b>  31:13  <b>number</b> 32:8  <b>numbers</b> 25:6  34:7  <b>nunn</b> 14:20  15:7</p>	<p style="text-align: center;"><b>o</b></p> <p><b>occurred</b> 28:22  <b>office</b> 32:14  <b>offices</b> 1:18  30:10  <b>official</b> 33:15  34:21  <b>oh</b> 5:20 13:25  17:19 18:8  23:2 26:13  <b>ohio</b> 32:2  <b>okay</b> 7:11  10:24 11:11  22:3 26:22  <b>old</b> 14:14,15,16  15:2,4  <b>older</b> 15:3  <b>once</b> 6:19 24:18  <b>online</b> 9:14  17:13  <b>open</b> 27:22  <b>opportunity</b>  5:15  <b>opposed</b> 11:5,9  <b>opposition</b> 11:3  29:1  <b>option</b> 10:22  <b>oral</b> 1:16 5:21  <b>original</b> 19:1  <b>ounce</b> 6:17  <b>ounces</b> 6:13  <b>outside</b> 9:8  14:8  <b>outstanding</b>  17:5</p>
---	--	---	---

<p><b>own</b> 7:25 8:3 14:1 21:21 25:21 <b>owned</b> 17:11 <b>owners</b> 22:22</p>	<p>29:5 <b>percent</b> 13:20 15:9,18 16:12 24:22 <b>period</b> 8:3 <b>periphery</b> 18:19 <b>permission</b> 28:15 <b>perry</b> 16:17 27:11,13 <b>person</b> 30:24 <b>personalities</b> 23:13 <b>personally</b> 33:11 34:15 <b>perspective</b> 21:4,18 <b>petition</b> 10:18 10:25 11:2 <b>petitioners</b> 1:8 2:2 <b>philippa</b> 28:17 <b>phone</b> 32:3 <b>physical</b> 12:13 <b>pick</b> 12:12 <b>pigs</b> 26:1 <b>pl</b> 1:4 <b>place</b> 1:21 15:13 <b>plan</b> 23:15,16 23:17,18,21 <b>plans</b> 8:6 <b>plant</b> 12:13</p>	<p><b>play</b> 19:18 <b>playing</b> 9:25 <b>please</b> 5:9 32:14 <b>plot</b> 18:9 26:4 <b>point</b> 14:15 <b>points</b> 19:25 <b>police</b> 12:7,7 13:6 15:17 <b>policy</b> 21:18 <b>political</b> 17:2 <b>population</b> 12:24 <b>prefer</b> 32:16 <b>prepare</b> 6:22 7:15 <b>present</b> 2:14 <b>presented</b> 30:19 <b>pretty</b> 13:14 16:11 18:16 <b>previous</b> 14:10 <b>previously</b> 4:8 22:6 <b>price</b> 20:23 <b>primary</b> 27:18 <b>private</b> 14:8 17:8 <b>probably</b> 6:20 8:19 <b>procedure</b> 1:20 30:14 33:5 34:5 <b>produced</b> 1:16</p>	<p><b>production</b> 32:23 <b>profit</b> 1:6 <b>project</b> 14:10 <b>pronounceme...</b> 19:13 <b>property</b> 7:25 8:3 16:5,13 17:25 20:21 24:22 25:16 <b>protection</b> 26:20 27:14 28:20 <b>provide</b> 29:2 <b>provided</b> 11:24 11:25 12:1 15:10 23:9 29:3 <b>provider</b> 27:18 <b>public</b> 1:17 30:3 31:11 33:10,18 34:15 34:23 35:23 <b>published</b> 9:18 <b>purchased</b> 32:17 <b>purpose</b> 10:8 <b>pursuant</b> 1:20 30:14 <b>put</b> 6:24 7:6 18:22 19:8 25:7 26:15 <b>putting</b> 7:14 18:10</p>
<b>p</b>			
<p><b>p.m.</b> 1:20 5:1 29:14 30:13 <b>page</b> 3:2 4:2,8 19:24 21:2,2 22:17,24 23:22 24:19 34:7 35:3 <b>paid</b> 27:2 <b>paper</b> 7:14 11:20 20:11 24:14,16,19 <b>paraphrase</b> 11:11 <b>parking</b> 10:2 27:4 <b>part</b> 27:13 34:9 <b>parties</b> 30:21 <b>party</b> 22:19 30:25 31:2 <b>path</b> 14:24 15:5 <b>pay</b> 12:8 17:4 26:4 <b>paying</b> 20:20 20:21,22 <b>people</b> 11:18 14:16 15:3 17:6 18:12 19:10,20 23:19 25:25 28:3</p>			

<b>q</b>	<b>record</b> 5:9,12 5:24 6:16 19:15 22:1 28:11 30:18 34:9	<b>required</b> 5:22 32:25	<b>right</b> 5:21 10:11 13:13 17:25 23:24 24:17 27:3,11
<b>quarter</b> 10:3 <b>question</b> 6:6 11:7,8 22:17 22:18,18 26:12 <b>questions</b> 3:3 5:8,22 6:2 22:1 29:11,12 <b>quite</b> 27:4 <b>quoted</b> 21:5	<b>reference</b> 32:8 33:2 34:2 <b>referenced</b> 20:7 22:16 32:11 33:11 34:15	<b>research</b> 8:25 <b>residence</b> 31:13 <b>resident</b> 19:7 <b>residents</b> 1:6 4:9 11:25 16:25 17:15 18:5 19:17 22:13 26:8 32:6 33:3 34:3	<b>rights</b> 18:2,3 <b>rightsizing</b> 11:21,23 <b>rmr</b> 1:17 <b>road</b> 14:13,17 24:9,11 27:3 <b>robertson</b> 2:3 <b>roughly</b> 21:14 <b>roughshod</b> 29:5
<b>r</b>	<b>referring</b> 23:21 23:25	<b>resources</b> 14:12 <b>respect</b> 28:20 <b>respondents</b> 1:12,18 2:7 30:10 <b>responding</b> 22:19 <b>responses</b> 5:21 <b>responsibility</b> 16:25 26:9 <b>retain</b> 16:25 26:9 <b>retired</b> 8:16 10:7,11 <b>returned</b> 32:18 <b>revenue</b> 20:16 <b>review</b> 32:14 33:1 34:1 <b>reviewed</b> 23:15 23:17 <b>rhorer</b> 27:3 <b>ride</b> 14:15	<b>rule</b> 5:18 <b>rules</b> 1:20 30:14 33:5 34:5 <b>run</b> 17:11 <b>running</b> 6:9 29:5
<b>raise</b> 15:16 <b>rate</b> 10:3 24:23 25:23 28:5 <b>rates</b> 16:14 25:19 <b>rather</b> 10:2 <b>read</b> 20:10,12 21:8 33:5,6,12 34:5,6,17 <b>reading</b> 32:12 32:19 <b>real</b> 12:11 15:22 17:18 19:15 20:19 <b>realize</b> 15:3 <b>reason</b> 6:10 19:16,23 34:8 35:3 <b>reasons</b> 11:13 <b>receipt</b> 32:19 <b>received</b> 17:3 <b>recollection</b> 25:9	<b>regime</b> 11:19 <b>regularly</b> 8:7 <b>relating</b> 5:4 <b>relations</b> 9:1 <b>relative</b> 30:25 <b>remember</b> 16:22 21:11,15 29:4 <b>remonstrance</b> 5:14 10:18,25 11:2 <b>remonstrators</b> 1:8 2:2 <b>removed</b> 21:9 <b>renowned</b> 9:5 <b>reporter</b> 5:23 33:7 <b>represented</b> 30:21 <b>republican</b> 12:22 <b>request</b> 34:9,11	<b>responding</b> 22:19 <b>responses</b> 5:21 <b>responsibility</b> 16:25 26:9 <b>retain</b> 16:25 26:9 <b>retired</b> 8:16 10:7,11 <b>returned</b> 32:18 <b>revenue</b> 20:16 <b>review</b> 32:14 33:1 34:1 <b>reviewed</b> 23:15 23:17 <b>rhorer</b> 27:3 <b>ride</b> 14:15	<b>s</b>
			<b>s</b> 34:8,8 35:3 <b>saith</b> 29:15 <b>sake</b> 22:8 24:8 <b>sat</b> 21:1 <b>save</b> 22:2 <b>says</b> 13:4 <b>scared</b> 13:11 <b>scheduled</b> 1:20 <b>schmooze</b> 17:18 <b>school</b> 8:10 9:15 16:1,2,10 20:13 21:8

<p>25:2,3  <b>sciences</b> 9:12  9:12  <b>seal</b> 31:4,11  33:15 34:21  <b>see</b> 8:13 21:16  21:17,20 22:25  <b>seen</b> 9:21 15:1  18:5  <b>sense</b> 5:25  <b>separately</b>  13:17  <b>service</b> 17:3,10  <b>set</b> 9:1 31:3  <b>seventh</b> 14:20  14:23  <b>several</b> 11:13  20:17 26:24  <b>shakes</b> 5:17  <b>sheet</b> 34:7,10  34:18 35:1  <b>shot</b> 9:22  <b>show</b> 21:24  <b>showed</b> 19:10  <b>shows</b> 14:11  <b>side</b> 9:23 13:8  27:6  <b>sides</b> 9:1  <b>sign</b> 10:18,21  10:25  <b>signature</b> 30:20  31:8 32:14  <b>signed</b> 11:1  33:13 34:18</p>	<p><b>signing</b> 32:12  32:19  <b>signs</b> 25:6  <b>sincerely</b> 32:21  <b>single</b> 18:10  <b>sir</b> 6:1,5 8:1,5  32:10  <b>size</b> 16:16  <b>slowly</b> 11:9  <b>smaller</b> 12:21  <b>smart</b> 8:20  <b>smithville</b> 14:7  <b>social</b> 20:20  <b>solutions</b> 32:1  35:1  <b>somebody</b> 15:8  <b>son</b> 10:16  <b>sorry</b> 5:20  10:12 13:25  20:12 21:11  26:15  <b>sort</b> 11:11 28:7  <b>sources</b> 20:16  <b>south</b> 2:4 18:15  <b>spanish</b> 9:3  <b>speaking</b> 21:18  <b>specifically</b>  23:21  <b>speed</b> 14:2  <b>spending</b> 13:23  <b>spoken</b> 5:19  <b>sports</b> 12:17,18  <b>spot</b> 10:2  <b>spring</b> 8:20</p>	<p><b>sprung</b> 11:21  <b>square</b> 26:3  <b>ss</b> 1:1 30:1  <b>start</b> 21:6,6  <b>state</b> 1:1,18 5:9  9:20 10:5,7  27:10 30:1,4  31:12 33:10  34:15  <b>statement</b>  33:13,14 34:19  34:19  <b>states</b> 28:13,16  <b>stations</b> 17:5  26:10,25  <b>stenographer</b>  8:22 12:5 14:6  16:8 18:14  21:13  <b>stenographic...</b>  30:16  <b>stephen</b> 2:9  <b>stop</b> 19:12  <b>stopped</b> 6:19  28:8  <b>stories</b> 10:17  <b>street</b> 1:19  14:20,23 19:2  25:8 27:5  30:11  <b>structure</b> 17:2  <b>student</b> 18:17  <b>students</b> 10:14  12:16</p>	<p><b>studied</b> 20:15  <b>stuff</b> 13:3 19:7  <b>subscribed</b>  33:10 34:14  35:21  <b>successor</b> 11:17  <b>suite</b> 2:10 32:2  <b>sunday</b> 24:19  <b>sunger</b> 2:12  <b>superior</b> 32:1  <b>supplemental</b>  22:25  <b>supplemented</b>  4:9 22:13  <b>supporting</b>  17:12 22:20  <b>sure</b> 10:19 20:6  <b>sworn</b> 1:16 5:3  30:6 33:10,13  34:14,18 35:21</p> <p style="text-align: center;"><b>t</b></p> <p><b>take</b> 6:10 12:10  13:17 15:21  17:22 19:12  21:3  <b>taken</b> 1:18 17:2  30:9,15 32:11  <b>talk</b> 11:9  <b>talked</b> 16:1  23:18 27:24  <b>talking</b> 12:2  24:21 27:7  28:2  <b>taught</b> 8:18</p>
--	--	---	--

<b>tax</b> 13:20 15:10 15:15 20:22 25:17 <b>taxes</b> 16:5,13 24:22 <b>teach</b> 9:15,19 10:4 <b>team</b> 12:18 <b>tell</b> 5:3 30:6 <b>telling</b> 17:6 24:24 <b>ten</b> 8:10 25:23 <b>terrible</b> 26:18 <b>territories</b> 28:21 <b>territory</b> 22:22 <b>testified</b> 5:5 23:8 <b>testify</b> 5:16 23:4,4 <b>testifying</b> 23:10 28:25 <b>testimony</b> 30:18 33:6,7 34:6,9,12 <b>thank</b> 6:17 29:12 <b>thanks</b> 6:20 <b>theater</b> 12:18 <b>thereof</b> 1:21 <b>thing</b> 14:2 15:17 16:3 20:13 23:12 <b>things</b> 12:19 20:18 26:1	<b>think</b> 8:18 13:21 16:18 18:4,23 20:2 20:25 21:19,20 23:12,13 25:22 <b>thinking</b> 13:13 <b>thirty</b> 32:18 <b>thought</b> 8:20 8:25 29:5 <b>thoughts</b> 4:3 6:24 7:6,14 <b>threatened</b> 17:15 19:18 <b>three</b> 23:20 25:25 <b>thursday</b> 7:9 <b>time</b> 1:21 5:1 10:11 13:8,10 15:25 25:13 26:25 27:23 29:14 <b>timely</b> 14:12 <b>times</b> 12:25 20:12,21 24:16 24:18 28:23 <b>timing</b> 6:13 <b>title</b> 22:12 <b>today</b> 6:2,23 17:22 23:11 <b>toes</b> 19:21 <b>took</b> 9:2,2 25:18 <b>town</b> 19:4 <b>township</b> 27:11 27:13	<b>trained</b> 28:3 <b>transcribed</b> 30:16 33:7 <b>transcript</b> 5:23 30:17 32:11,16 33:5,12 34:5 34:11,17 <b>trash</b> 17:10,10 17:11 <b>treat</b> 26:5 <b>trial</b> 1:20 23:10 29:1 30:14 <b>tried</b> 13:1,17 17:18 18:11 <b>true</b> 30:18 <b>truth</b> 5:3,4,4 17:7 24:24 30:7,7,8 <b>truthfully</b> 6:3 <b>trying</b> 16:21 <b>tuesday</b> 7:8 <b>turn</b> 22:24 <b>tv</b> 14:21 <b>two</b> 20:21 24:8 25:4,11 <b>twoplex</b> 18:22 <b>typed</b> 7:7 <b>typewritten</b> 4:3 30:17 <b>typical</b> 13:5 18:18 28:13	<b>understand</b> 6:4 6:6 11:1 27:16 <b>understanding</b> 21:3,7 24:12 <b>unger</b> 2:9 <b>unionville</b> 15:18 <b>unit</b> 18:8 27:24 <b>university</b> 9:9 9:20 10:5 12:11 18:16 <b>upper</b> 20:19 <b>usaa</b> 28:6 <b>used</b> 16:17 18:16
			<b>v</b>
			<b>v</b> 32:6 33:3 34:3 <b>veritext</b> 32:1,8 35:1 <b>vietnam</b> 21:22 <b>virtually</b> 13:11 <b>vote</b> 17:20,23 18:1,3 19:8 23:20,24 24:9 24:10 <b>voting</b> 18:2 <b>vs</b> 1:9
			<b>w</b>
			<b>waived</b> 32:13 32:20 <b>want</b> 15:15,18 15:21 18:6 20:4 28:11
		<b>u</b>	
		<b>u.s.</b> 8:25 <b>under</b> 16:24 27:9 30:16	

<b>wanted</b> 8:13 14:16 15:9 19:16 <b>wants</b> 14:18 18:1 <b>war</b> 21:22 <b>water</b> 6:18,21 12:7,8 <b>way</b> 11:19 15:19 24:5 28:10 <b>we've</b> 10:16 22:17 <b>wednesday</b> 7:8 <b>week</b> 10:20 25:4 27:21 <b>weeks</b> 25:11 27:21 <b>went</b> 5:11 8:11 8:23,24,24 14:8 16:12,15 <b>west</b> 7:19 13:12 19:2 27:6 <b>whereof</b> 31:3 <b>wife</b> 7:24 8:7 20:20 <b>william</b> 2:3 32:5 <b>win</b> 18:12 <b>witness</b> 1:16 13:25 16:21 31:3 32:9 33:1 33:4,11 34:1,4 34:15	<b>witnesses</b> 22:23 <b>wjbeegs</b> 2:5 <b>woman</b> 17:11 17:11 <b>words</b> 9:18 <b>work</b> 8:11 19:24 <b>worked</b> 10:9,10 <b>works</b> 10:16 <b>worst</b> 19:14 <b>wow</b> 24:20 <b>writing</b> 6:24 19:22 <b>written</b> 1:20 <b>wrong</b> 12:24 <b>wrote</b> 14:22
	<b>x</b>
	<b>xfinity</b> 14:3,3
	<b>y</b>
	<b>yard</b> 25:7 <b>yeah</b> 8:19 10:7 23:2 26:11 27:15 28:10 <b>year</b> 24:2 25:10 <b>years</b> 7:22 8:12 10:8 23:20,20 24:9,10 <b>yiddish</b> 9:3 <b>york</b> 24:18 <b>young</b> 15:4
	<b>z</b>
	<b>zero</b> 25:24

Indiana Rules of Trial Procedure  
Depositions Upon Oral Examination

Rule 30

(e) Submission to witness--Changes--Signing.

(1) When the testimony is fully transcribed, the deposition shall be submitted to the witness for reading and signing and shall be read to or by him, unless such reading and signing have been waived by the witness and by each party. "Submitted to the witness" as used in this subsection shall mean (a) mailing of written notification by registered or certified mail to the witness and each attorney attending the deposition that the deposition can be read and examined in the office of the officer before whom the deposition was taken, or (b), mailing the original deposition, by registered or certified mail, to the witness at an address designated by the witness or his attorney, if requested to do so by the witness, his attorney, or the party taking the deposition.

(2) If the witness desires to change any answer in the deposition submitted to him, each change, with a statement of the reason therefor, shall be made



by the witness on a separate form provided by the officer, shall be signed by the witness and affixed to the original deposition by the officer. A copy of such changes shall be furnished by the officer to each party.

(3) If the reading and signing have not been waived by the witness and by each party the deposition shall be signed by the witness and returned by him to the officer within thirty (30) days after it is submitted to the witness. If the deposition has been returned to the officer and has not been signed by the witness, the officer shall execute a certificate of that fact, attach it to the original deposition and deliver it to the party taking it. In such event, the deposition may be used by any party with the same force and effect as though it had been signed by the witness.

(4) In the event the deposition is not returned to the officer within thirty (30) days after it has been submitted to the witness, the reporter shall execute a certificate of that fact and cause the certificate to be delivered to the party taking it. In such event, any party may use a copy of the

deposition with the same force and effect as though  
the original had been signed by the witness.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES  
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.  
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,  
2019. PLEASE REFER TO THE APPLICABLE STATE RULES  
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at [www.veritext.com](http://www.veritext.com).