

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

IN THE CIRCUIT COURT OF MONROE COUNTY

CAUSE NO. 53C06-2203-PL-000509

5
 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

DEPOSITION OF CHARLES DOBBS

14
 15
 16 The deposition upon oral examination of
 CHARLES DOBBS, a witness produced and sworn before
 17 me, Janine A. Ferren, RMR, CRR, CSR-IL No. 84-4852,
 Notary Public in and for the County of Hamilton,
 18 State of Indiana, taken on behalf of the
 Respondents, at the offices of Bloomington City
 19 Hall, 401 North Morton Street, Bloomington, Monroe
 County, Indiana, on the 1st day of March 2024,
 20 scheduled to commence at 1:30 p.m., pursuant to the
 Indiana Rules of Trial Procedure with written
 21 notice as to time and place thereof.
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APPEARANCES

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ALSO PRESENT:

Margaret Clements

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DIRECT EXAMINATION5
 Questions by Andrew M. McNeil

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Deposition Exhibit No.:	Page
Exhibit 53 - Typewritten notes, "Thoughts for deposition, Friday, March 1, 2024"	7

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Exhibit 28 - Amended and Supplemented Answers of County Residents Against Annexation, Inc. to City of Bloomington's Interrogatories	22

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?

1 A Yes, sir.

2 Q Your job today is to answer my questions as
3 truthfully and completely as you can. Do you
4 understand that?

5 A Yes, sir.

6 Q If you do not understand my question, will you
7 let me know?

8 A Absolutely.

9 Q We're running about 30 minutes or so, but if you
10 need to take a break for any reason, will you
11 let me know that?

12 A Absolutely. My doctor makes me drink a hundred
13 ounces a day of fluid and I wasn't timing it to
14 be here now, and I apologize, but I may have to.

15 Q Well, just let me know and we will go off the
16 record and accommodate you.

17 A Thank you. I just finished a 20-ounce bottle of
18 water, is why I say that, and I've already
19 stopped once.

20 Q Thanks. It's probably a good habit, though. I
21 should drink more water.

22 Did you do anything to prepare for the
23 deposition today?

24 A Yes. I put down my thoughts in writing, which
25 is --

1 Q Is that Exhibit 53?

2 A -- Exhibit 53.

3 (Deposition Exhibit 53 marked for
4 identification.)

5 Q When did you create the document that's now
6 Exhibit 53 and put your thoughts --

7 A I typed up notes on Monday, and because I'm a
8 freak, I edited it on Tuesday, Wednesday, and
9 Thursday. And if you hadn't called, I might
10 well have been editing it before I came here.

11 Q Okay.

12 A Not major changes because it's not grammatically
13 correct, but ...

14 Q Other than putting your thoughts down on paper,
15 did you do anything else to prepare for the
16 deposition?

17 A No.

18 Q What is your address?

19 A 828 West Baywood Drive, Bloomington 47403.

20 Q How long have you lived there?

21 A We moved in on July 21, 2014, so nine and a half
22 years.

23 Q Does anyone else live there with you?

24 A My wife, Ann.

25 Q Do you own any other property in --

1 A No, sir.

2 Q -- in Annexation Area 1A or 1B?

3 A Don't own any other property, period.

4 Q Your home in Baywood, is it in Area 1B?

5 A Yes, sir.

6 Q Do you have any plans currently to move?

7 A No. I kid my wife regularly about it because of
8 my arthritis, but the answer is no. She's a
9 Bloomington girl. I met her here when I came to
10 graduate school. We dated for ten months, got
11 married, got done, went off to work for nearly
12 40 years. Came back because her folks were
13 still alive and she wanted to see them on life's
14 last journey, which she did.

15 Q So is that when you moved back to Bloomington?

16 A We retired a little early. I was 64, she was
17 61.

18 Q You mentioned, I think, you taught history?

19 A Yeah. This is -- probably because no one cares,
20 but I thought I was being smart. In the spring
21 of 1972 after Nixon had gone to China --

22 (Stenographer clarification.)

23 A In 1972 after Nixon went to China -- he actually
24 went in February -- but when he went to China.

25 I thought I'd research the history of U.S.-East

1 Asia relations from both sides, you'd be set for
2 life with a great job. Took Chinese. Took
3 actually Yiddish, Hebrew, Spanish, French,
4 German, Chinese, but in different eras.

5 And I came here because this had a renowned
6 language department, a huge history department,
7 and one of the best -- actually the biggest
8 liberal arts library outside of Harvard in the
9 country. University of Illinois has a bigger
10 library but they have ag and engineering which
11 Indiana does not. So if you just say arts and
12 sciences, it's the biggest arts and sciences
13 library. Historians live in the library. Not
14 now, it's all online. So anyway, I came here to
15 go to grad school and to teach.

16 So I have five books and, I don't know,
17 20-something articles and 400 encyclopedia
18 entries, about a million words published.

19 Q Where did you teach?

20 A First Metropolitan State University, it's in
21 downtown Denver, Colorado. If you've ever seen
22 a shot of Mile High next to the interstate, the
23 other side of the interstate is the campus. So
24 if you have a class on a Monday, let's say, and
25 the Broncos are playing Monday night, if you

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.

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 --

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

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.

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

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

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

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

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

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

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.

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.

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

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 --

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.

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,

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

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

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

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.

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CHARLES DOBBS

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1 STATE OF INDIANA)
) SS:
2 COUNTY OF HAMILTON)

3 I, Janine A. Ferren, a Notary Public in and
4 for the County of Hamilton, State of Indiana at
5 large, do hereby certify that CHARLES DOBBS, the
6 deponent herein, was by me first duly sworn to tell
7 the truth, the whole truth, and nothing but the
8 truth in the aforementioned matter;

9 That the foregoing deposition was taken on
10 behalf of the Respondents, at the offices of
11 Bloomington City Hall, 401 North Morton Street,
12 Bloomington, Monroe County, Indiana, on the 1st day
13 of March 2024, commencing at the hour of 1:25 p.m.,
14 pursuant to the Indiana Rules of Trial Procedure;

15 That said deposition was taken down
16 stenographically and transcribed under my
17 direction, and that the typewritten transcript is a
18 true record of the testimony given by the said
19 deponent; and thereafter presented to said deponent
20 for his signature;

21 That the parties were represented by their
22 counsel as aforementioned.

23 I do further certify that I am a disinterested
24 person in this cause of action; that I am not a
25 relative or attorney of any party, or otherwise

1 interested in the event of this action, and am not
2 in the employ of the attorneys for any party.

3 IN WITNESS WHEREOF, I have hereunto set my
4 hand and affixed my notarial seal on this 15th
5 day of March 2024.

6
7
8



9
10
11

Janine A. Ferren

Seal, Notary Public
State of Indiana
Janine A. Ferren
Commission No. NP0681591

My Commission Expires:
April 22, 2024
County of Residence:
Hamilton

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Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

March 15, 2024

To: William J. Beggs, Esq.

Case Name: County Residents Against Annexation, Inc., Et Al. v. The
Common Council Of The City Of Bloomington, Monroe County, Indiana, Et
Al.

Veritext Reference Number: 6465811

Witness: Charles Dobbs Deposition Date: 3/1/2024

Dear Sir/Madam:

The deposition transcript taken in the above-referenced
matter, with the reading and signing having not been
expressly waived, has been completed and is available
for review and signature. Please call our office to
make arrangements for a convenient location to
accomplish this or if you prefer a certified transcript
can be purchased.

If the errata is not returned within thirty days of your
receipt of this letter, the reading and signing will be
deemed waived.

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

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

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Charles Dobbs

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

I have made no changes to the testimony
as transcribed by the court reporter.

Date Charles Dobbs

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

They have read the transcript;
They signed the foregoing Sworn
Statement; and
Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal

this _____ day of _____, 20_____.

Notary Public

Commission Expiration Date

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

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

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Charles Dobbs

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

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

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

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

Date Charles Dobbs

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

- They have read the transcript;
- They have listed all of their corrections
in the appended Errata Sheet;
- They signed the foregoing Sworn
Statement; and
- Their execution of this Statement is of
their free act and deed.

I have affixed my name and official seal
this _____ day of _____, 20____.

Notary Public

Commission Expiration Date

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ERRATA SHEET
VERITEXT LEGAL SOLUTIONS MIDWEST
ASSIGNMENT NO: 3/1/2024

PAGE/LINE(S) /	CHANGE	/REASON

Date Charles Dobbs
SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
DAY OF _____, 20_____ .

Notary Public

Commission Expiration Date

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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.

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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.

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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.

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