

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,)
7 INC., an Indiana not for profit)
8 corporation, et al.)

9 Remonstrators/Appellants/Petitioners,)

10 -vs-)

11 THE COMMON COUNCIL of the City of)
12 Bloomington, Monroe County, Indiana,)
13 et al.)

14 Respondents.)

15 DEPOSITION OF HARRY FERRIS

16
17 The deposition upon oral examination of HARRY
18 FERRIS, a witness produced and sworn before me,
19 Colleen Brady, Notary Public in and for the County
20 of Monroe, State of Indiana, taken on behalf of the
21 Respondents, at the offices of Bloomington City
22 Hall, 401 North Morton Street, Room 225,
23 Bloomington, Monroe County, Indiana, on the
24 27th day of February 2024, at 1:41 p.m., pursuant
25 to the Indiana Rules of Trial Procedure with
written notice as to time and place thereof.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES

FOR THE PETITIONERS:

William J. Beggs
BUNGER & ROBERTSON
211 South College Avenue
Bloomington, IN 47404
812.332.9295
wjbeggs@lawbr.com

FOR THE RESPONDENTS:

Andrew M. McNeil
BOSE MCKINNEY & EVANS LLP
111 Monument Circle
Suite 2700
Indianapolis, IN 46204
317.684.5000
amcneil@boselaw.com

ALSO PRESENT:

Margaret Clements

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF EXAMINATION

Page

DIRECT EXAMINATION	4
Questions by Andrew M. McNeil	

INDEX OF EXHIBITS

Page

Previously Marked Exhibits:

Exhibit 28 - Amended and Supplemented34
Answers of County Residents Against Annexation Inc. to City of Bloomington's Interrogatories	

1 (Time noted: 1:41 p.m.)

2 HARRY FERRIS,
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 Could you state your name for the record please?

10 A Harry -- full legal name; right? Harry E.

11 Ferris Jr. I just go by Harry Ferris. Father
12 is passed away. Some attorney told me I could
13 drop the Jr.

14 Q Well, Harry, my name Andrew McNeil. I'm one of
15 the attorneys for is the City of Bloomington in
16 this annexation remonstrance case. Have you
17 ever been through a deposition before?

18 A Yes.

19 Q When most recently?

20 A Probably been 25, 30 years. I worked for big
21 trucking companies. We were always suffering
22 litigation.

23 Q Well, the process hasn't changed. Maybe the
24 technology has. So you understand, your role
25 here is to answer my questions as completely and

1 truthfully as you can; right?

2 A Yes.

3 Q If you don't understand my question, will you
4 let me know?

5 A I'll ask for clarification.

6 Q If you need me to rephrase it, just speak up,
7 let me know.

8 A Right.

9 Q And if you answer it, I will assume you
10 understood it. Is that fair?

11 A Fair.

12 Q We're trying to get you out in about 45 minutes.

13 A All right.

14 Q But even so, if you need to take a break for any
15 reason, will you let me know that?

16 A Sure. Certainly.

17 Q What is your address?

18 A 4132 West Broadway Avenue, Bloomington. 47404.

19 Q Is that in Annexation Area 1A?

20 A Yes.

21 Q Does anyone else live at that West Broadway
22 address with you?

23 A No. When this all started -- my wife is
24 deceased. I lost my wife two years ago. So,
25 yes, she was living there with me.

1 Q Not currently --

2 A Currently, I'm solo.

3 Q I'm sorry for your loss.

4 A Thank you.

5 Q Did you or your wife at the time sign a
6 remonstrance petition opposing the annexation?

7 A I believe only one signature per property. So
8 my signature.

9 Q You signed it?

10 A Yes.

11 Q How long have you owned the 4132 West Broadway
12 property?

13 A Since October of 2013. Maybe the end of
14 September. Somewhere in there. So 10 plus
15 years.

16 Q Do you own any other property in either Area 1A
17 or 1B?

18 A No, I do not.

19 Q Do you have any plans to move?

20 A No, I do not, currently. I just --

21 Q Sure.

22 A Not trying to be difficult.

23 Q No, I appreciate that. Do you work currently?

24 A Yes.

25 Q Where did you work?

1 A Bloomington Transit.

2 Q And how long have you worked there?

3 A Ten years.

4 Q To get from Bloomington Transit from your home,
5 what route do you take?

6 A Basically Broadway to Western Avenue to 3rd
7 Street to Patterson, to Grimes.

8 Q What do you do for Bloomington Transit?

9 A Bus operator. Part time.

10 Q Do you have any other employment?

11 A None.

12 Q If you work part time, do you have a regular set
13 schedule from week to week?

14 A Yes.

15 Q What is your schedule?

16 A Basically, 7:05 a.m. to 12:30 Monday, Tuesday,
17 Thursday, Friday. I have Wednesday off. Again,
18 part time. Approximately, 22 hours and a
19 fraction. I just round it down to 22 hours.

20 Q Other than working at Bloomington Transit, do
21 you do anything else within the city limits?
22 Like, do you get -- do you go shopping, get
23 groceries, eat at restaurants within city
24 limits?

25 A On occasion. Do you need specifics?

1 Q If you could ballpark?

2 A Kroger. I buy my gas at Kroger. Shop at
3 Kroger. They call it Highland Village, which is
4 on the west side, but it's in the city. I use
5 the Planet Fitness on West 3rd Street in
6 Whitehall Plaza. From time to time, I shop at
7 Menander. I believe that's in the city. Shop
8 at Walmart, but that's county.

9 Q Do you ever go to the city parks for any reason?

10 A No, but when I -- I lived in the city for 17
11 years. So I did go to parks and park functions
12 and I had younger children.

13 Q When you lived in the city, where did you live?

14 A Paddington Court, which is down off of Allendale
15 in Sherwood Oaks. There's a Sherwood Oaks and a
16 Sherwood Oaks II.

17 Q You were in Sherwood Oaks?

18 A Sherwood Oaks. My back fence line was the --
19 for a while, was the boundary between the city
20 and the county. I woke up one morning, read in
21 the paper that they had been annexed. That was
22 during mayor Fernandez's term. So I asked my
23 neighbor and he wasn't aware that he got annexed
24 by the city.

25 Q Do you attend any other events within the city

1 or any events at Indiana University sporting
2 events or other performances?

3 A No, I use state property, but I have attended
4 one football game in the last -- probably last
5 20 years. No basketball games. And I have
6 attended the opera at the Musical Arts Center
7 once last fall.

8 Q So if you were thinking the about your home on
9 West Broadway, if you were to call the fire
10 department -- you had a kitchen fire or
11 something -- what's your understanding of which
12 service provider would be the primary responder?

13 A Primary responder would be Ellettsville 'cause
14 fire department is under contract to our
15 township, and it's approximately a long mile,
16 less than 2 miles away just off of Curry.

17 And I'm glad you brought that up because
18 when the city had an orientation for annexation
19 downstairs, I attended that. And one of my
20 questions was going to be to the fire
21 department. They had a booth, the police
22 department had a booth, and I wanted to ask what
23 their response time would be. Now they
24 published in the paper that it would be seven
25 minutes, but if you've ever sat at West 3rd at

1 peek traffic time, they can't get from down
2 there -- now their closest -- the city's closest
3 station is on Franklin, over there by McDonald's
4 and Interstate 96. I sit and watch the fire
5 trucks can't get through the traffic. They're
6 just sitting on their horns. So, again, and
7 I -- my neighbors have called the fire
8 department. And Ellettsville responds within
9 three to five minutes. City says their response
10 time is would be seven. I place it closer --
11 and trying to be fair -- 11 minutes for them to
12 respond across the interstate because of
13 traffic.

14 Q Do you know what rating the Bloomington fire
15 department has?

16 A Last I -- I'm glad you brought that up 'cause
17 again -- well, the night they had orientation, I
18 stopped at the booth for fire department and the
19 police, and they had parks and rec there and a
20 few other departments. They were talking about
21 to people. So I went around the corner
22 downstairs and talked to the people about my
23 taxes. And they were estimating what the
24 increase on my taxes would be at that time.
25 Approximately 6:15, I came back and the police

1 and fire department personnel had all abandoned
2 their booth. They were supposed to be there
3 till 8:00.

4 So that was my intend questions to them is
5 fire department response time and police
6 department response time. Now I know for a fact
7 that the police do not have their -- to my best
8 observations, are not -- are only responding to
9 911 calls. Working for the bus company, I've
10 sat down at the Transit Center at 3rd and
11 Walnut, which is just a block west of the police
12 station at Lincoln and 3rd Street, and they
13 all -- the police officers, due to their
14 decreased numbers, cannot -- they sit at the
15 police station and wait for a call and then four
16 or five vehicles come running out either 3rd and
17 Walnut or down the ally behind the bus station
18 to respond to a call. So they are staged at the
19 police station.

20 Q You mean in contrast, they are not out on
21 patrol?

22 A Correct.

23 Q Please continue.

24 A The police chief, I have a good friend that just
25 went through a police orientation meeting, said

1 that they're not responding to any -- or pulling
2 over people for traffic violations, that they're
3 undermanned and understaffed; which my
4 understanding, they're budgeted for 105 officers
5 and they only have 85. So I have to question
6 why they can't hire and retain people.

7 The current police chief, who was
8 renominated or appointed by the new current
9 mayor, reappointed him. But I'm going back -- I'm
10 guesstimating -- five, six years, city council
11 appropriated \$225,000 for the city to fix the
12 roof on the current police station. Instead of
13 doing that, the police chief went and bought an
14 armored car that created all kinds of public
15 uproar. So I feel the city is mismanaged. And
16 the fire department, everything I hear and read
17 in the papers and listen to on the media, is
18 understaffed. So both police and fire
19 department are understaffed.

20 From my experience and living in the city
21 for 17 years, my taxes went up every two years
22 and my services went down every two years. They
23 went from free garbage collection to paid
24 garbage collection. They went from putting
25 anything at the curb -- that you put at the curb

1 would be picked up to limitations that anything
2 other than two cans, which you had to buy
3 stickers -- pay stickers to have pay for.

4 We had to pay for -- so we went from free
5 garbage service to pay garbage service to
6 limitations on how much we could put to the
7 curb, and any special pickups, we had to pay
8 extra for. When I moved into the property in
9 1996, we had free vacuum of leaves on a weekly
10 basis.

11 Q Who provided that service?

12 A The city. And they went from weekly to monthly
13 to once a year to total elimination of leaf
14 collection.

15 So currently I drive a bus for City of
16 Bloomington. The city streets aren't
17 maintained. All the city manhole covers are
18 uneven. And there's potholes all over the city.
19 Now sometimes we can go through our dispatcher
20 and point out a pothole that's getting out of
21 hand or getting too deep.

22 Q You mean the Bloomington Transport dispatcher?

23 A Dispatcher. And request and sometimes the city
24 responds.

25 Q Let me back up.

1 A Okay.

2 Q My question was do you know what the current
3 fire department rating is?

4 A Oh, I'm sorry.

5 Q That's all right. We would have covered --

6 A I digress.

7 Q We would have covered all this stuff anyway
8 but --

9 A My understanding, the last I heard and I
10 wanted -- I digress because I wanted to verify
11 it. Chicago has the highest rating because,
12 when the city burnt to the ground, they improved
13 their fire department. And my understanding,
14 the city's rating is equivalent to Chicago's.
15 Now correct me if I'm wrong or you have other
16 information to update me; I haven't seen
17 anything to the contrary.

18 Q That's your understanding?

19 A Yes.

20 Q Okay. You mentioned in your answer that the
21 police chief -- you talked about a friend of
22 yours who was at a recent police orientation --

23 A Right.

24 Q -- with the police chief.

25 A Spoke very highly of the police chief, I might

1 add.

2 Q Thank you. When you say police orientation,
3 what do you mean?

4 A Well, my friend thought it was just a general
5 overview. But the city -- the police department
6 does this every fall. It's basically a
7 recruiting session where they offer the public
8 to come in. People come in and sit down. And
9 one week, they'll have, like, the SWAT team get
10 up and give a presentation, patrol officer
11 another time. They have a judge from the court
12 to come in. It's a 12-week seminar or -- I call
13 it an orientation. But --

14 Q So it was in that context?

15 A Yes. Basically recruiting. 'Cause I've had --
16 I've known other young -- my friend is 71 years
17 old and he's not looking for a job.

18 Q What's his name?

19 A Chris Wilson. So and he --

20 Q So did Mr. Wilson convey that the police chief
21 said that they were understaffed and they were
22 budgeted for 105 but had about 85 actual?

23 A Right. And they weren't responding to -- or
24 taking care of any traffic violations. And I
25 can testify to that because on the bus, I see --

1 Q From your observations?

2 A I'm at intersection and there's a policeman
3 sitting there and somebody runs an all-way stop
4 in front of him, and they just don't do
5 anything. And, to be fair, they've been
6 maligned, they're undermanned, they're
7 understaffed. So I don't know -- I can kind of
8 understand the hands-off approach, but people
9 are getting out of hand; so ...

10 Q Let me ask you this about the police. There was
11 a study done that City of Bloomington paid for a
12 few years ago to look at the staffing levels of
13 the police department. Are you familiar with
14 that?

15 A I believe so to the extent that there was an
16 article in the paper that was kind of giving an
17 overview of it. So somewhat familiar with what
18 you're talking about.

19 Q Your information about that study would be what
20 you read in the newspaper --

21 A Yes.

22 Q -- as opposed to reading the study yourself?

23 A Correct.

24 Q In the article you read, do you remember it
25 reporting on the ultimate conclusions or

1 recommendations from that study?

2 A Lot of officers were hiring in and leaving. The
3 only conclusion that I recall was that they are
4 underpaid. Since then, I know city council
5 pushed through big pay raises for them and
6 possibly -- and I might not have this correct --
7 bonuses, hiring bonuses and retention bonuses.
8 Some kind of package to that --

9 Q To try to help with recruiting?

10 A Right. And retention.

11 Q And retention. I don't remember if you said
12 this or not. Might have been another witness.
13 There have been a few today. Did you say you've
14 had experience with calling -- I know your
15 neighbor had experience with Ellettsville fire
16 department.

17 Have you had experience with calling the
18 Monroe County Sheriff's Department for any
19 reason?

20 A Yes.

21 Q Did you call them to your residence? Is there a
22 particular situation?

23 A Yes.

24 Q What's the situation?

25 A I walk my dogs on street. We don't have

1 sidewalk. And I had a fella -- I was walking,
2 and there was a four-way stop about 10 houses
3 down. He ran the stop sign and almost -- kind
4 of gave me a brush back. I'm not going to say
5 he tried to hit me. So I yelled at him. I have
6 to add this. He had a small child in his car.
7 Got out of his car and started swearing, cursing
8 at me. Threatened to -- called me an old man.
9 Threatened into beat me up, physically. I just
10 stood there. I didn't respond in kind other
11 than to say, "No, you ran the stop sign and I
12 call you out on it." Got his license number.
13 Called the deputy's sheriff's office and said
14 "This guy ran a stop sign. Got out of his
15 car -- I called him on it. He threatened me
16 with bodily harm and here's his license plate
17 number."

18 Q And did a sheriff's deputy ever come to your
19 house to take a further statement from you?

20 A I didn't call 911. I called the sheriff's
21 office direct. Talked to dispatcher deputy on
22 duty. She told me that she had written
23 everything down, and they didn't have a
24 patrolman in the area right now but they would
25 follow up on it.

1 Q Did anyone follow up on it?

2 A Not with me.

3 Q So you don't know if they ever followed up with
4 a driver?

5 A Correct.

6 Q Are you familiar with the organization County
7 Residents Against Annexation?

8 A Yes.

9 Q What is your familiarity or understanding with
10 that organization?

11 A It's a nonprofit organization. It's advocating
12 against annexation.

13 Q Have you been involved with that organization
14 either on a board of advisors or board of
15 directors or holding an office --

16 A Position, no.

17 Q Have you attended any meetings?

18 A I have to ask, if you don't mind, just for --
19 they had --

20 Q Your best recollection.

21 A I went to the meeting at the fairgrounds. So I
22 don't know if -- I think Margaret was there but
23 I don't know if --

24 Q If that was --

25 A -- they were holding -- hosting that or not as

1 an organization. And I went to a meeting at
2 Van Buren Fire Department where, again, I don't
3 know who was host -- my understanding was it was
4 Van Buren Township was hosting that meeting, but
5 I'm not clear on that, expressing their concerns
6 about funding if they were annexed and having to
7 do away with their fire department or trimming
8 manpower and equipment. And I also attended
9 Washington Township. Is that on North Old 37?

10 Q You attended a meeting out there?

11 A As well. So three. To my recollection, three
12 meetings, public meetings, concerned with
13 annexation. And whether the organization was
14 hosting that or -- I don't think, the two fire
15 departments, they were but possibly the one --
16 but I think that was just collecting signatures
17 at the fairgrounds.

18 Q Let me refine my question a little bit.

19 A Okay.

20 Q So I understand there's monthly or semi regular
21 meetings --

22 A No.

23 Q -- of CRAA?

24 A None. Never attended or even been invited, to
25 my knowledge. And I'm not on -- they might -- I

1 hope I'm not speaking out of turn. I'm not on
2 social media or Facebook or any of that. So if
3 those, you know, invitations are extend through
4 those social medias, I'm --

5 Q It doesn't reach you?

6 A -- unaware of it. Doesn't apply to me.

7 Q Have you ever donated to CRAA?

8 A Yes.

9 Q How much?

10 A \$300.

11 Q Is that all at one time?

12 A Yes.

13 Q When did you do that?

14 A Very start. Very start.

15 Q Have you ever communicated with other people via
16 email or text message about the annexation?

17 A No.

18 Q When you signed the remonstrance petition
19 originally, did you understand you were
20 expressing opposition to the annexation?

21 A Yes.

22 Q Are you still opposed to the annexation?

23 A Yes.

24 Q Why?

25 A To recap, I feel the city is mismanaged. Has

1 been ever since I moved to Bloomington in 1996
2 under Fernandez, Kruzan ...

3 Q Hamilton?

4 A Hamilton, I'm sorry. And I just heard the new
5 mayor on New Addition earlier this month, maybe
6 the end of January. Her question was put to
7 her -- she ran on a platform of affordable
8 housing. And they were talking about affordable
9 housing on this forum or news show, and somebody
10 called in or asked a question about getting
11 business to move to Bloomington with jobs. And
12 her response was "No, we need to build
13 affordable housing first."

14 Well, I'm a commerce guy and the jobs got
15 to come first before people can afford housing
16 to pay for their housing. So building housing
17 prior to getting business is counterproductive
18 in my view. And I travel a 75-mile radius; I go
19 to estate auctions. I go over to Columbus;
20 they've got a big industrial park in Columbus.
21 You can go to Mooresville; they've got a big
22 industrial park with jobs there. And pretty
23 much -- even in Bedford, there's some industry
24 moving in there. Not a lot.

25 To recap, I've lived in Bloomington 25

1 years. They don't attract any business. They
2 bought this technical park. This land just to
3 the northwest of this building was all IU
4 warehouses, which the city bought from that and
5 were going to turn it into a technical park,
6 which no businesses, to my knowledge, have moved
7 in.

8 Now on the flip side, Bill Cook was well
9 established in this community and thought highly
10 of Bloomington. Bill Cook businesses and he
11 started Cook Pharmica in the city, and that's
12 now been purchased by Catalent, who's expanded
13 that. But that expansion was pretty much due to
14 the COVID virus and packaging the -- the
15 injections.

16 Q Vaccines?

17 A Yeah, thank you. So I don't see business being
18 attracted here. Again, my taxes always went up.
19 We asked Mayor Hamilton -- and I heard him asked
20 on FIU, I heard him asked in the paper -- "What
21 are you going to do for us when you annex us?"
22 And he admitted. He said, "We're not going to
23 do anything."

24 So the city is not going to add any
25 services. They are going to force me to

1 purchase their sanitation service, which I pay,
2 on an independent service, one third of what the
3 city is going to charge me. And I have
4 neighbors -- now I went around the city -- or
5 around my neighborhood collecting signatures and
6 talking to my neighbors. There's neighbors that
7 are on fixed incomes. That cannot afford the
8 taxes increase and/or the forced garbage
9 service. They don't know what they're going to
10 do. One of them lives diagonally behind. Her
11 name is Sue May. She is willing to testify to
12 that effect. She is semi invalid and probably
13 couldn't come down here to testify or make
14 testimony to you in person. But she's available
15 to be talked to.

16 And I had other neighbors that I talked
17 that wouldn't sign the remonstrance because they
18 were afraid of retaliation. Now why, didn't go
19 into it. I didn't pry. They just said, "I'm
20 against it but I won't sign because I'm afraid."

21 Q Let me ask you about the mayor comment.

22 A All right.

23 Q Did you hear him on a program?

24 A Yes.

25 Q Yourself?

1 A Yes. And quoted in the paper.

2 Q Right. I understand quoted in the paper. But
3 it was the mayor's voice on a radio or internet
4 program or TV that you heard?

5 A Right. Ask the Mayor, I believe, on FIU. Every
6 Wednesday, they do the surrendering counties.
7 Didn't mean to interrupt.

8 Q That's all right. What do you remember the
9 question being?

10 A Just basically what new and additional services
11 were going to be added. Specifically, there was
12 quotes from people in the paper. Some people --
13 now I'm on city water and sewage. Some people
14 in Section 1A and 1B are on septic tank, and
15 they asked specifically "Can we hook up to the
16 city?" And the answer was "Yes. \$15,000 per
17 property."

18 Some people were asked "What about adding
19 sidewalks to our neighborhoods?" Because a lot
20 of the neighborhoods don't have it. Sidewalks.
21 "Yes, we'll put sidewalks in but we'll charge
22 you for them."

23 Q This is on the radio program?

24 A Radio -- no, on the septic tank and sidewalks,
25 were newspaper quotes.

1 Q Okay. I appreciate you sharing that
2 information. I just want to understand --

3 A Sure. No, I want to be clear.

4 Q I appreciate that. On the Ask The Mayor on
5 WFIU, the question along the lines of what new
6 or additional services will the city provide if
7 we're annexed. Fair summary of the question?

8 A That's my understanding as I recall.

9 Q Your testimony, I think, is in the answer, the
10 mayor said we wouldn't provide --

11 A No, additional anything.

12 Q No additional --

13 A Just fire. Fire and police. And I'm
14 assuming -- and this is a big assumption on my
15 part -- snow removal come winter.

16 Q So did you understand in his answer to be saying
17 that the annexation area landowners would
18 receive the same city services that everyone
19 else receives and nothing beyond those? Or are
20 you saying something different?

21 A I think I'm saying something different. I think
22 I'm saying they anticipated providing police,
23 fire, street services -- as in, snow removal --
24 and nothing more.

25 I think, as I recall, somebody asked about

1 parks. And the response was there would be no
2 new or additional parks in the annexation areas.

3 Q Did you understand, though, that if the
4 annexation occurred, that the landowners in the
5 annexation area would be -- if there was a
6 charge, for example, at a city park -- they
7 would be able to pay the in-city fee as opposed
8 to the out-of-city fee?

9 A Yes. You mean as in, like, parks and rec, where
10 they have the programs?

11 Q Right.

12 A Yeah. So if we were annexed, we would be part
13 of the city and we have a right to those
14 programs. And we were told -- when we started
15 to oppose annexation, our sewage and water rates
16 went up 11 percent. Now my neighborhood is 60
17 years old. So the infrastructure is already
18 there. But the city council passed and we have
19 a surcharge of 11 percent on our bills every
20 month for being nonresident users of the
21 existing city and water sewage systems; but --
22 and I will clarify that for you -- if we
23 accepted annexation, that 11 percent surcharge
24 would go away.

25 Q So you're on the city water and sewer. Would

1 you -- go ahead.

2 A I was just going to say, I'm aware of three
3 cave-ins on my street; two sewer and one water.
4 The one cave-in is at the corner of my property.
5 It's been there for five years. They just came
6 out, put a barricade.

7 One of the residents in my neighborhood
8 works for City of Bloomington Utilities. He
9 says they're understaffed, and they only respond
10 to emergency repairs and anything else that
11 needs to be done, the city is going to contract
12 out, third-party people, to do maintenance work.

13 Q Sorry. What's that neighbor's name?

14 A Ryan -- I'm sorry.

15 Q If it comes to you, you can add it.

16 A Yeah. I'll -- yeah.

17 Q So on the city and water service that you have
18 right now, would you be agreeable to
19 disconnecting from that service if annexation
20 does not become effective?

21 A Do I have a choice?

22 Q Just asking the question. 'Cause it's the City
23 of Bloomington Utility provides the water and
24 sewer service --

25 A Right.

1 Q -- and you pay the fee, the monthly charges.

2 A Right.

3 Q But if annexation didn't happen and Bloomington
4 said we're not going to provide services --

5 A Well --

6 Q -- outside of our boundaries, would you be
7 opposed to that?

8 A Let me throw this curve at you. The line I'm on
9 was installed to accommodate the GE Plant when
10 it was built on Curry Pike because they wanted
11 city water. So they threw that line in. My two
12 streets back up to the old GE facility, which is
13 now Cook, which is being subleased to a chip
14 maker and was being renovated by Cook.

15 So my understanding is that the City of
16 Bloomington has a contract with Cook to supply
17 water to their facility, and I'm on that line.
18 So I don't know how they would disconnect me.

19 Q They can just disconnect your lateral, for
20 example.

21 A They can turn it off, right, from the main. My
22 utilities run down the back line. But that
23 seems counterproductive to me, but I can't deny
24 your hypothesis.

25 Q Let me ask this way: Do you think it's in your

1 best interest to continue receiving the water
2 and sewer services from the City of Bloomington?

3 A Well, I pay my bills and I would expect them to
4 continue it. Seem to say me a commitment on
5 their part when they put those lines in, for
6 whatever reason. I shared with you my
7 understanding that it was put in as an offshoot
8 to, really, sell water -- or provide water to
9 old GE, which is now currently the Cook
10 property.

11 Q So you think when a sewer line is installed and
12 there were conditions on it, those conditions
13 should you be honored?

14 A I believe so. And I might add that,
15 approximately, I think it was pre COVID so we're
16 probably going back four years, the city did pay
17 an outside contractor to line the pipes because
18 they were leaking sewage, specifically.

19 So I'd like to think that they made an
20 investment and they weren't going to just walk
21 away from that investment. But I could be
22 wrong.

23 Q I asked you about why you opposed the annexation
24 and you have given some information, city
25 mismanaged and things like that. Is the change

1 in property taxes to your parcel a basis for
2 your opposition to the annexation?

3 A At the time the number that was quoted to me
4 downstairs, it was a 60 percent increase. It
5 would not -- personally, I have to admit, it
6 would not cripple me to pay the increase taxes.
7 But I have, again -- now as I said, I walk my
8 dogs up and down the neighborhood. There's
9 approximately 95 houses on my two streets. And
10 I stop and talk to anybody that wants to talk,
11 and I've always asked their views and opinions
12 on annexation; and there's a lot of concerned,
13 worried people about the tax increase and the
14 sanitation, forced sanitation services.

15 Q Have you ever revived the City of Bloomington's
16 fiscal plan that was adopted as part of the
17 annexation ordinance in 2021?

18 A I believe they sent me a copy and I read it
19 thoroughly.

20 Q It was like a 500-page report. Is that what you
21 read?

22 A Right. And there was -- now there was two.
23 There was an economic development plan for
24 developing 3rd Street corridor from Curry to Ivy
25 Tech, which was online, which was very

1 extensive. Then I received a big booklet from
2 the city outlining their proposal. And what
3 kind of concerned my about that was there was no
4 outreach from the city saying -- or any public
5 forums, "Hey, people we would like to consider
6 annexing you. What's your thoughts?" They just
7 sent the annexation. This is back in 2017 where
8 they just said "We're annexing you."

9 Q Did you get a packet --

10 A I got a packet.

11 Q -- from 2021 --

12 A It wasn't 500 pages what I got. Oh, I got
13 another one. I got one in '17 and, if it was
14 '21, another follow up after the, you know, the
15 state legislature stopped the first annexation.
16 That went to the Supreme Court. It was
17 overruled. So the city came back again and sent
18 out certified mail --

19 Q Right.

20 A -- another booklet. I believe I still have
21 that.

22 Q The fiscal plan is a specific document. It's
23 Fiscal Plan 5.0.

24 A Where they went into purchasing equipment,
25 sanitation equipment, expanding the police

1 staff.

2 Q Right. Financial impact on overlapping taxing
3 authorities.

4 A Right.

5 Q So you've looked at that?

6 A Yeah.

7 Q Okay.

8 A I'm not vastly familiar with it. But I have
9 looked through it.

10 Q Do you have any opinion or understanding of
11 whether the fiscal plan that you received in
12 2021 complies with Indiana law? Or you don't
13 know one way or the other?

14 A I don't know one way or the other.

15 Q Do you have any information to suggest that the
16 fiscal plan is, somehow, inaccurate or
17 inadequate under Indiana law?

18 A Inadequate under law, not to my knowledge.

19 Q Or inaccurate?

20 A I believe it was inaccurate only because, in
21 previous lives, I worked in purchasing and
22 purchasing fleets. And I did study -- having
23 worked at Bloomington Transit, I was vastly
24 familiar with their operation. And the
25 sanitation -- I remember looking at the

1 sanitation. I didn't feel they were going to be
2 able to purchase enough equipment. They were
3 going to expand the bus company. Didn't see
4 that as a possibility. And the sanitation
5 services, I didn't feel the plan was adequate to
6 purchase new and additional equipment to expand
7 to cover the new annexed areas.

8 Q And that observation is based on your life
9 experience --

10 A Yes.

11 Q -- work history, and things like that?

12 A Purchasing requirements, lead time for
13 purchasing equipment. Sanitation equipment is
14 very specialize. Buses, there's a five-year
15 delay in ordering new buss.

16 (Exhibit 28 previously marked.)

17 Q If you look at the documents on the table there,
18 there's one with an Exhibit 28 sticker on it.
19 The title is "Amended and Supplemented Answers
20 of County Residents Against Annexation to the
21 City of Bloomington's Interrogatories."

22 Do you see that?

23 A Yes.

24 Q Can you turn please to page 12, Question 13.

25 "Identify and list all facts and documents

1 supporting your contention in the petition that
2 the annexation is not in the best interest of
3 owners of land in the annexation territory."

4 Do you see that?

5 A Yes.

6 Q If you turn to the next question on page 13,
7 under the supplemental answer heading, it says
8 "See Supplemental Answer Number 5. In addition,
9 if called to testify, the following would be
10 asked to testify about the impact of annexation
11 upon them and upon their businesses," and on the
12 very last line of that paragraph, do you see
13 your name there, Harry Ferris?

14 A End of last line, right?

15 Q Yes.

16 A Okay, yes.

17 Q So you've testified already a lot about sort of
18 your perception of the impact of the annexation
19 on others in your neighborhood or people you've
20 talked to, people on fixed incomes, for example.
21 You talked about your impression of the city and
22 mismanagement and the staffing levels at the
23 police, the fire, and utility. My question
24 is -- and probably some other things too. I
25 don't want rehash what we've already talked

1 about.

2 A Understand.

3 Q Is there other information or testimony that you
4 have to offer about why you think the annexation
5 would not be in the best interest of the
6 landowners in the annexation areas that we
7 haven't talked about?

8 A According to my research, there's two state
9 statutes. One is population density; we don't
10 meet the criteria for population density. And
11 the other is 60 percent of the land in our
12 proposed annexed area isn't commercial.

13 Q Have you done an analysis of the population
14 density on a persons per square acre basis --

15 A Personally?

16 Q Yeah.

17 A No.

18 Q Have you seen an analysis?

19 A Yes.

20 Q Where have you seen that analysis?

21 A Some public -- when I say "public," it's media
22 document analysis. And I don't -- I can't cite
23 who that was done by other than two or three
24 times -- two different sources. Now the two or
25 three -- I have to admit, two or three sources

1 might have been quoting each other. I don't
2 know that. My understanding that the
3 population, grossly under the state criteria.

4 Q So if it's three persons per acre, is it your
5 recollection that it was short in --

6 A My understanding was one and a half.

7 Q But for both 1A and 1B? Or just one and not the
8 other?

9 A 1A. And the 60 percent zoned commercial,
10 likewise, for 1A. Can't speak to 1B.

11 Q Okay. That was what I --

12 A That's what you wanted.

13 Q That's what I wanted to understand. Anything
14 else about best interest that we haven't talked
15 about that you think would support your
16 observation that the annexation is not in the
17 best interest of landowners?

18 A Again, just to reiterate: mismanagement,
19 history of mismanagement, understaffed police
20 and fire -- which are two biggies for me. And
21 personally not the taxation but --

22 Q But for other people?

23 A Most definitely. Most definitely. Some people
24 thought they would have to move, but I don't
25 think they can afford to move or they would.

1 Old Highland Village, I don't know if you're
2 vastly familiar with the area, but it's a lot of
3 people on fixed incomes. Lot of people on fixed
4 incomes.

5 Q I don't remember if I asked you this at the very
6 beginning. Do you have an intent, present
7 intent to --

8 A Yeah, you asked me. To move, no. My answer
9 was, no.

10 Q Do you have a mortgage on your property?

11 A No.

12 Q So when you pay your taxes, you pay them
13 directly.

14 A Yes.

15 Q As opposed to the bank or the mortgage company?

16 A Yes, right.

17 Q Do you have the Homestead exemption?

18 A Yes.

19 Q Are you 65 or over?

20 A Yes.

21 Q Do you have the 65 over --

22 A Yes.

23 Q Over 65 circuit breaker on your property?

24 A Yes. My wife told me we were. So let me --

25 Q As far as you know?

1 A Yes.

2 Q Do you know how Bloomington's municipal tax rate
3 compares to the tax rate of other cities in
4 Indiana?

5 A Only my sources from the media. And it's the
6 highest, is what I've heard, according to the
7 media that I read or heard.

8 Q Highest in --

9 A I haven't researched it myself.

10 Q Highest in Monroe County, or highest compared to
11 other cities in Indiana?

12 A In the state.

13 Q Okay.

14 A Now I can't imagine places like Carmel or
15 Westfield aren't higher but ...

16 MR. MCNEIL: Mr. Ferris those are all the
17 questions I have for you at this time. Thank
18 you very much. I appreciate it.

19 MR. BEGGS: No questions. Thank you. We'd
20 like signature.

21 (Time noted: 2:30 p.m.)

22

23

24

25

1 AND FURTHER THE DEPONENT SAITH NOT.
2
3
4

5 HARRY FERRIS
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

3 I, Colleen Brady, a Notary Public in and for
4 the County of Monroe, State of Indiana at large, do
5 hereby certify that HARRY FERRIS, the deponent
6 herein, was by me first duly sworn to tell the
7 truth, the whole truth, and nothing but the truth
8 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 Room 225, Bloomington, Monroe County, Indiana, on
13 the 27th day of February 2024, commencing at the
14 hour of 1:41 p.m., pursuant to the Indiana Rules of
15 Trial Procedure;

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

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

24 I do further certify that I am a disinterested
25 person in this cause of action; that I am not a

1 relative or attorney of any party, or otherwise
2 interested in the event of this action, and am not
3 in the employ of the attorneys for any party.

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

7
8
9

Colleen Brady

Colleen Brady

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Seal, Notary Public
State of Indiana

My Commission Expires:
March 8, 2029

Colleen Brady
Commission No. NP0732235

County of Residence:
Monroe

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

March 15, 2024

To: Mr. Beggs

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

Veritext Reference Number: 6465804

Witness: Harry Ferris Deposition Date: 2/27/2024

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465804

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

DATE OF DEPOSITION: 2/27/2024

WITNESS' NAME: Harry Ferris

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

Harry Ferris

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465804

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

DATE OF DEPOSITION: 2/27/2024

WITNESS' NAME: Harry Ferris

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 Harry Ferris

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

&	2013 6:13	401 1:19 41:11	96 10:4
& 2:3,9	2017 32:7	4132 5:18 6:11	a
0	2021 31:17	44114 43:2	a.m. 7:16
000509 1:4	32:11 33:12	45 5:12	abandoned
1	2024 1:20	46204 2:10	11:1
10 6:14 18:2	41:13 42:6	47404 2:4 5:18	able 27:7 34:2
105 12:4 15:22	43:4	5	above 43:10
11 10:11 27:16	2029 42:12	5 35:8	accepted 27:23
27:19,23	21 32:14	5.0. 32:23	accommodate
1100 43:1	211 2:4	500 31:20	29:9
111 2:9	216-523-1313	32:12	accomplish
12 15:12 34:24	43:3	53c06-2203 1:4	43:15
12:30 7:16	22 7:18,19	6	accordance
13 34:24 35:6	225 1:19 41:12	60 27:16 31:4	44:5 45:5
15 43:4	225,000 12:11	36:11 37:9	acknowledge
15,000 25:16	25 4:20 22:25	6465804 43:7	44:11 45:16
15th 42:5	25563 42:9	44:2 45:2	acre 36:14 37:4
17 8:10 12:21	2700 2:10	65 38:19,21,23	act 44:14 45:20
32:13	27th 1:20 41:13	6:15 10:25	action 41:25
1820 43:2	28 3:8 34:16,18	7	42:2
1996 13:9 22:1	2:30 39:21	71 15:16	actual 15:22
1:41 1:20 4:1	3	75 22:18	add 15:1 18:6
41:14	30 4:20	7:05 7:16	23:24 28:15
1a 5:19 6:16	300 21:10	8	30:14
25:14 37:7,9	317.684.5000	8 42:12	added 25:11
37:10	2:11	812.332.9295	adding 25:18
1b 6:17 25:14	34 3:8	2:5	addition 22:5
37:7,10	37 20:9	85 12:5 15:22	35:8
2	3rd 7:6 8:5	8:00 11:3	additional
2 9:16	9:25 11:10,12	9	25:10 26:6,11
2/27/2024 43:8	11:16 31:24	911 11:9 18:20	26:12 27:2
44:3 45:3 46:2	4	95 31:9	34:6
20 9:5 44:16	4 3:3		address 5:17,22
45:22 46:22			adequate 34:5

<p>admit 31:5 36:25</p> <p>admitted 23:22</p> <p>adopted 31:16</p> <p>advisors 19:14</p> <p>advocating 19:11</p> <p>affixed 42:5 44:15 45:21</p> <p>afford 22:15 24:7 37:25</p> <p>affordable 22:7 22:8,13</p> <p>aforemention... 41:8,23</p> <p>afraid 24:18,20</p> <p>ago 5:24 16:12</p> <p>agreeable 28:18</p> <p>ahead 28:1</p> <p>al 1:7,12 43:6,6 44:3,3 45:3,3</p> <p>allendale 8:14</p> <p>ally 11:17</p> <p>amcneil 2:11</p> <p>amended 3:8 34:19</p> <p>analysis 36:13 36:18,20,22</p> <p>andrew 2:8 3:3 4:8,14</p> <p>annex 23:21</p> <p>annexation 1:6 3:9 4:16 5:19 6:6 9:18 19:7</p>	<p>19:12 20:13 21:16,20,22 26:17 27:2,4,5 27:15,23 28:19 29:3 30:23 31:2,12,17 32:7,15 34:20 35:2,3,10,18 36:4,6 37:16 43:6 44:3 45:3</p> <p>annexed 8:21 8:23 20:6 26:7 27:12 34:7 36:12</p> <p>annexing 32:6 32:8</p> <p>answer 4:25 5:9 14:20 25:16 26:9,16 35:7,8 38:8</p> <p>answers 3:9 34:19</p> <p>anticipated 26:22</p> <p>anybody 31:10</p> <p>anyway 14:7</p> <p>appear 44:11 45:15</p> <p>appearances 2:1</p> <p>appellants 1:9</p> <p>appended 45:11,18</p> <p>apply 21:6</p>	<p>appointed 12:8</p> <p>appreciate 6:23 26:1,4 39:18</p> <p>approach 16:8</p> <p>appropriated 12:11</p> <p>approximately 7:18 9:15 10:25 30:15 31:9</p> <p>area 5:19 6:16 18:24 26:17 27:5 36:12 38:2</p> <p>areas 27:2 34:7 36:6</p> <p>armored 12:14</p> <p>arrangements 43:14</p> <p>article 16:16,24</p> <p>arts 9:6</p> <p>asked 8:22 22:10 23:19,19 23:20 25:15,18 26:25 30:23 31:11 35:10 38:5,8</p> <p>asking 28:22</p> <p>assignment 44:2 45:2 46:2</p> <p>assume 5:9</p> <p>assuming 26:14</p> <p>assumption 26:14</p>	<p>attached 45:7</p> <p>attend 8:25</p> <p>attended 9:3,6 9:19 19:17 20:8,10,24</p> <p>attorney 4:12 42:1</p> <p>attorneys 4:15 42:3</p> <p>attract 23:1</p> <p>attracted 23:18</p> <p>auctions 22:19</p> <p>authorities 33:3</p> <p>authorize 45:11</p> <p>available 24:14 43:12</p> <p>ave 43:1</p> <p>avenue 2:4 5:18 7:6</p> <p>aware 8:23 28:2</p> <hr/> <p style="text-align: center;">b</p> <hr/> <p>back 8:18 10:25 12:9 13:25 18:4 29:12,22 30:16 32:7,17</p> <p>ballpark 8:1</p> <p>bank 38:15</p> <p>barricade 28:6</p> <p>based 34:8</p> <p>basically 7:6,16 15:6,15 25:10</p>
--	--	--	---

basis 13:10 31:1 36:14 basketball 9:5 beat 18:9 bedford 22:23 beggs 2:3 39:19 43:5 beginning 38:6 behalf 1:18 41:10 believe 6:7 8:7 16:15 25:5 30:14 31:18 32:20 33:20 best 11:7 19:20 30:1 35:2 36:5 37:14,17 beyond 26:19 big 4:20 17:5 22:20,21 26:14 32:1 biggies 37:20 bill 23:8,10 bills 27:19 30:3 bit 20:18 block 11:11 bloomington 1:11,19,20 2:4 4:15 5:18 7:1,4 7:8,20 10:14 13:16,22 16:11 22:1,11,25 23:10 28:8,23 29:3,16 30:2 33:23 41:11,12	43:6 44:3 45:3 bloomington's 3:10 31:15 34:21 39:2 board 19:14,14 bodily 18:16 bonuses 17:7,7 17:7 booklet 32:1,20 booth 9:21,22 10:18 11:2 bose 2:9 boselaw.com 2:11 bought 12:13 23:2,4 boundaries 29:6 boundary 8:19 brady 1:18 41:3 42:9,13 break 5:14 breaker 38:23 broadway 5:18 5:21 6:11 7:6 9:9 brought 9:17 10:16 brush 18:4 budgeted 12:4 15:22 build 22:12 building 22:16 23:3	built 29:10 bunger 2:3 buren 20:2,4 burnt 14:12 bus 7:9 11:9,17 13:15 15:25 34:3 buses 34:14 business 22:11 22:17 23:1,17 businesses 23:6 23:10 35:11 buss 34:15 buy 8:2 13:2	cause 1:4 9:13 10:16 15:15 28:22 41:25 cave 28:3,4 center 9:6 11:10 certainly 5:16 certificate 45:11 certification 44:1 45:1 certified 32:18 43:15 certify 41:5,24 change 30:25 45:8 46:3 changed 4:23 changes 44:7 45:7,9 charge 24:3 25:21 27:6 charges 29:1 chicago 14:11 chicago's 14:14 chief 11:24 12:7,13 14:21 14:24,25 15:20 child 18:6 children 8:12 chip 29:13 choice 28:21 chris 15:19 circle 2:9 circuit 1:3 38:23
		c	
		ca 43:25 call 8:3 9:9 11:15,18 15:12 17:21 18:12,20 43:13 called 10:7 18:8 18:13,15,20 22:10 35:9 calling 17:14 17:17 calls 11:9 cans 13:2 car 12:14 18:6 18:7,15 care 15:24 carmel 39:14 case 4:16 43:6 44:3 45:3 catalent 23:12	

cite 36:22 cities 39:3,11 city 1:11,19 3:9 4:15 7:21,23 8:4,7,9,10,13 8:19,24,25 9:18 10:9 12:10,11,15,20 13:12,15,16,17 13:18,23 14:12 15:5 16:11 17:4 21:25 23:4,11,24 24:3,4 25:13 25:16 26:6,18 27:6,7,8,13,18 27:21,25 28:8 28:11,17,22 29:11,15 30:2 30:16,24 31:15 32:2,4,17 34:21 35:21 41:11 43:6 44:3 45:3 city's 10:2 14:14 civil 44:5 45:5 clarification 5:5 clarify 27:22 clear 20:5 26:3 clements 2:16 cleveland 43:2 closer 10:10	closest 10:2,2 collecting 20:16 24:5 collection 12:23,24 13:14 colleen 1:18 41:3 42:9,13 college 2:4 columbus 22:19,20 come 11:16 15:8,8,12 18:18 22:15 24:13 26:15 comes 28:15 commencing 41:13 comment 24:21 commerce 22:14 commercial 36:12 37:9 commission 42:12,14 44:19 45:25 46:25 commitment 30:4 common 1:11 43:6 44:3 45:3 communicated 21:15 community 23:9 companies 4:21	company 11:9 34:3 38:15 compared 39:10 compares 39:3 completed 43:12 completely 4:25 complies 33:12 concerned 20:12 31:12 32:3 concerns 20:5 conclusion 17:3 conclusions 16:25 conditions 30:12,12 consider 32:5 contention 35:1 context 15:14 continue 11:23 30:1,4 contract 9:14 28:11 29:16 contractor 30:17 contrary 14:17 contrast 11:20 convenient 43:14 convey 15:20 cook 23:8,10,11 29:13,14,16	30:9 copy 31:18 corner 10:21 28:4 corporation 1:7 correct 11:22 14:15 16:23 17:6 19:5 corrections 45:17 corridor 31:24 council 1:11 12:10 17:4 27:18 43:6 44:3 45:3 counsel 41:23 counterprodu... 22:17 29:23 counties 25:6 county 1:2,3,6 1:11,18,20 3:9 8:8,20 17:18 19:6 34:20 39:10 41:2,4 41:12 42:13 43:6 44:3,10 45:3,15 court 1:3 8:14 15:11 32:16 44:7 cover 34:7 covered 14:5,7 covers 13:17
--	--	---	--

<p>covid 23:14 30:15 craa 20:23 21:7 created 12:14 cripple 31:6 criteria 36:10 37:3 curb 12:25,25 13:7 current 12:7,8 12:12 14:2 currently 6:1,2 6:20,23 13:15 30:9 curry 9:16 29:10 31:24 cursing 18:7 curve 29:8</p>	<p>deep 13:21 definitely 37:23 37:23 delay 34:15 density 36:9,10 36:14 deny 29:23 department 9:10,14,21,22 10:8,15,18 11:1,5,6 12:16 12:19 14:3,13 15:5 16:13 17:16,18 20:2 20:7 43:23 departments 10:20 20:15 deponent 40:1 41:5,20,20</p>	<p>difficult 6:22 digress 14:6,10 direct 3:3 4:7 18:21 direction 41:18 directly 38:13 directors 19:15 disconnect 29:18,19 disconnecting 28:19 disinterested 41:24 dispatcher 13:19,22,23 18:21 document 32:22 36:22 documents 34:17,25 dogs 17:25 31:8 doing 12:13 donated 21:7 downstairs 9:19 10:22 31:4 drive 13:15 driver 19:4 drop 4:13 due 11:13 23:13 duly 4:3 41:6 duty 18:22</p>	<p style="text-align: center;">e</p> <p>e 4:10 earlier 22:5 eat 7:23 economic 31:23 effect 24:12 effective 28:20 either 6:16 11:16 19:14 elimination 13:13 ellettsville 9:13 10:8 17:15 email 21:16 emergency 28:10 employ 42:3 employment 7:10 entered 45:9 entire 44:5 45:5 equipment 20:8 32:24,25 34:2,6,13,13 equivalent 14:14 errata 43:17 45:7,10,18 46:1 established 23:9 estate 22:19 estimating 10:23</p>
d			
<p>date 43:8 44:3 44:9,19 45:3 45:13,25 46:20 46:25 day 1:20 41:13 42:6 44:16 45:22 46:22 days 43:17 dear 43:9 deceased 5:24 decreased 11:14 deed 44:14 45:20 deemed 43:19</p>	<p>deposition 1:15 1:17 4:17 41:9 41:16 43:8,10 44:1,3 45:1,3 deputy 18:18 18:21 deputy's 18:13 developing 31:24 development 31:23 diagonally 24:10 different 26:20 26:21 36:24</p>		

<p>et 1:7,12 43:6,6 44:3,3 45:3,3 evans 2:9 event 42:2 events 8:25 9:1 9:2 examination 1:17 3:1,3 4:7 examined 4:5 example 27:6 29:20 35:20 executed 45:10 execution 44:14 45:19 exemption 38:17 exhibit 3:8 34:16,18 exhibits 3:6,7 existing 27:21 expand 34:3,6 expanded 23:12 expanding 32:25 expansion 23:13 expect 30:3 experience 12:20 17:14,15 17:17 34:9 expiration 44:19 45:25 46:25</p>	<p>expires 42:12 expressing 20:5 21:20 expressly 43:12 extend 21:3 extensive 32:1 extent 16:15 extra 13:8</p> <p style="text-align: center;">f</p> <p>facebook 21:2 facility 29:12 29:17 fact 11:6 facts 34:25 fair 5:10,11 10:11 16:5 26:7 fairgrounds 19:21 20:17 fall 9:7 15:6 familiar 16:13 16:17 19:6 33:8,24 38:2 familiarity 19:9 far 38:25 father 4:11 february 1:20 41:13 fee 27:7,8 29:1 feel 12:15 21:25 34:1,5 fella 18:1 fence 8:18</p>	<p>fernandez 22:2 fernandez's 8:22 ferris 1:15,17 4:2,11,11 35:13 39:16 40:5 41:5 43:8 44:4,9 45:4,13 46:20 financial 33:2 fire 9:9,10,14 9:20 10:4,7,14 10:18 11:1,5 12:16,18 14:3 14:13 17:15 20:2,7,14 26:13,13,23 35:23 37:20 first 22:13,15 32:15 41:6 fiscal 31:16 32:22,23 33:11 33:16 fitness 8:5 fiu 23:20 25:5 five 10:9 11:16 12:10 28:5 34:14 fix 12:11 fixed 24:7 35:20 38:3,3 fleets 33:22 flip 23:8 follow 18:25 19:1 32:14</p>	<p>followed 19:3 following 35:9 follows 4:5 football 9:4 force 23:25 forced 24:8 31:14 foregoing 41:9 44:13 45:18 forum 22:9 forums 32:5 four 11:15 18:2 30:16 fraction 7:19 franklin 10:3 free 12:23 13:4 13:9 44:14 45:20 friday 7:17 friend 11:24 14:21 15:4,16 front 16:4 full 4:10 functions 8:11 funding 20:6 further 18:19 40:1 41:24</p> <p style="text-align: center;">g</p> <p>game 9:4 games 9:5 garbage 12:23 12:24 13:5,5 24:8 gas 8:2</p>
--	---	---	--

<p>ge 29:9,12 30:9</p> <p>general 15:4</p> <p>getting 13:20 13:21 16:9 22:10,17</p> <p>give 15:10</p> <p>given 30:24 41:19</p> <p>giving 16:16</p> <p>glad 9:17 10:16</p> <p>go 4:11 7:22 8:9,11 13:19 22:18,19,21 24:18 27:24 28:1</p> <p>going 9:20 12:9 18:4 23:5,21 23:22,24,25 24:3,9 25:11 28:2,11 29:4 30:16,20 34:1 34:3</p> <p>good 11:24</p> <p>grimes 7:7</p> <p>groceries 7:23</p> <p>grossly 37:3</p> <p>ground 14:12</p> <p>guesstimating 12:10</p> <p>guy 18:14 22:14</p>	<p>hamilton 22:3 22:4 23:19</p> <p>hand 13:21 16:9 42:5</p> <p>hands 16:8</p> <p>happen 29:3</p> <p>harm 18:16</p> <p>harry 1:15,17 4:2,10,10,11,14 35:13 40:5 41:5 43:8 44:4 44:9 45:4,13 46:20</p> <p>heading 35:7</p> <p>hear 12:16 24:23</p> <p>heard 14:9 22:4 23:19,20 25:4 39:6,7</p> <p>help 17:9</p> <p>hereunto 42:4</p> <p>hey 32:5</p> <p>higher 39:15</p> <p>highest 14:11 39:6,8,10,10</p> <p>highland 8:3 38:1</p> <p>highly 14:25 23:9</p> <p>hire 12:6</p> <p>hiring 17:2,7</p> <p>history 34:11 37:19</p> <p>hit 18:5</p>	<p>holding 19:15 19:25</p> <p>home 7:4 9:8</p> <p>homestead 38:17</p> <p>honored 30:13</p> <p>hook 25:15</p> <p>hope 21:1</p> <p>horns 10:6</p> <p>host 20:3</p> <p>hosting 19:25 20:4,14</p> <p>hour 41:14</p> <p>hours 7:18,19</p> <p>house 18:19</p> <p>houses 18:2 31:9</p> <p>housing 22:8,9 22:13,15,16,16</p> <p>hypothesis 29:24</p> <p style="text-align: center;">i</p> <p>identify 34:25</p> <p>ii 8:16</p> <p>imagine 39:14</p> <p>impact 33:2 35:10,18</p> <p>impression 35:21</p> <p>improved 14:12</p> <p>inaccurate 33:16,19,20</p> <p>inadequate 33:17,18</p>	<p>incomes 24:7 35:20 38:3,4</p> <p>incorporated 45:12</p> <p>increase 10:24 24:8 31:4,6,13</p> <p>independent 24:2</p> <p>index 3:1,6</p> <p>indiana 1:1,6 1:11,18,20,21 9:1 33:12,17 39:4,11 41:1,4 41:12,14 42:12</p> <p>indianapolis 2:10</p> <p>industrial 22:20,22</p> <p>industry 22:23</p> <p>information 14:16 16:19 26:2 30:24 33:15 36:3</p> <p>infrastructure 27:17</p> <p>injections 23:15</p> <p>ins 28:3</p> <p>installed 29:9 30:11</p> <p>intend 11:4</p> <p>intent 38:6,7</p> <p>interest 30:1 35:2 36:5 37:14,17</p>
h			
<p>half 37:6</p> <p>hall 1:19 41:11</p>			

<p>interested 42:2 internet 25:3 interrogatories 3:10 34:21 interrupt 25:7 intersection 16:2 interstate 10:4 10:12 invalid 24:12 investment 30:20,21 invitations 21:3 invited 20:24 involved 19:13 iu 23:3 ivy 31:24</p>	<p>17:14 19:3,22 19:23 20:3 21:3 24:9 29:18 32:14 33:13,14 37:2 38:1,25 39:2 knowledge 20:25 23:6 33:18 known 15:16 kroger 8:2,2,3 kruzan 22:2</p>	<p>license 18:12 18:16 life 34:8 likewise 37:10 limitations 13:1,6 limits 7:21,24 lincoln 11:12 line 8:18 29:8 29:11,17,22 30:11,17 35:12 35:14 45:7 46:3</p>	<p>looking 15:17 33:25 loss 6:3 lost 5:24 lot 17:2 22:24 25:19 31:12 35:17 38:2,3</p>
<p>j</p>	<p>i</p>	<p>lines 26:5 30:5 list 34:25 listed 45:7,17 listen 12:17 listing 45:7 litigation 4:22 little 20:18 live 5:21 8:13 lived 8:10,13 22:25 lives 24:10 33:21 living 5:25 12:20 llp 2:9 location 43:14 long 6:11 7:2 9:15 look 16:12 34:17 looked 33:5,9</p>	<p>m</p> <p>m 2:8 3:3 4:8 madam 43:9 made 30:19 44:7 mail 32:18 main 29:21 maintained 13:17 maintenance 28:12 make 24:13 43:14 maker 29:14 maligned 16:6 man 18:8 manhole 13:17 manpower 20:8 march 42:6,12 43:4 margaret 2:16 19:22 marked 3:7 34:16 matter 4:5 41:8 43:11</p>
<p>j 2:3 january 22:6 job 15:17 jobs 22:11,14 22:22 jr 4:11,13 judge 15:11</p>	<p>land 23:2 35:3 36:11 landowners 26:17 27:4 36:6 37:17 large 41:4 lateral 29:19 law 33:12,17,18 lawbr.com 2:5 lead 34:12 leaf 13:13 leaking 30:18 leaves 13:9 leaving 17:2 legal 4:10 43:1 46:1 legislature 32:15 letter 43:18 levels 16:12 35:22</p>	<p>living 5:25 12:20 llp 2:9 location 43:14 long 6:11 7:2 9:15 look 16:12 34:17 looked 33:5,9</p>	<p>manpower 20:8 march 42:6,12 43:4 margaret 2:16 19:22 marked 3:7 34:16 matter 4:5 41:8 43:11</p>
<p>k</p>	<p>land 23:2 35:3 36:11 landowners 26:17 27:4 36:6 37:17 large 41:4 lateral 29:19 law 33:12,17,18 lawbr.com 2:5 lead 34:12 leaf 13:13 leaking 30:18 leaves 13:9 leaving 17:2 legal 4:10 43:1 46:1 legislature 32:15 letter 43:18 levels 16:12 35:22</p>	<p>living 5:25 12:20 llp 2:9 location 43:14 long 6:11 7:2 9:15 look 16:12 34:17 looked 33:5,9</p>	<p>manpower 20:8 march 42:6,12 43:4 margaret 2:16 19:22 marked 3:7 34:16 matter 4:5 41:8 43:11</p>
<p>kind 16:7,16 17:8 18:3,10 32:3 kinds 12:14 kitchen 9:10 know 5:4,7,15 10:14 11:6 14:2 16:7 17:4</p>	<p>land 23:2 35:3 36:11 landowners 26:17 27:4 36:6 37:17 large 41:4 lateral 29:19 law 33:12,17,18 lawbr.com 2:5 lead 34:12 leaf 13:13 leaking 30:18 leaves 13:9 leaving 17:2 legal 4:10 43:1 46:1 legislature 32:15 letter 43:18 levels 16:12 35:22</p>	<p>living 5:25 12:20 llp 2:9 location 43:14 long 6:11 7:2 9:15 look 16:12 34:17 looked 33:5,9</p>	<p>manpower 20:8 march 42:6,12 43:4 margaret 2:16 19:22 marked 3:7 34:16 matter 4:5 41:8 43:11</p>

mayor 8:22 12:9 22:5 23:19 24:21 25:5 26:4,10 mayor's 25:3 mcdonald's 10:3 mckinney 2:9 mcneil 2:8 3:3 4:8,14 39:16 mean 11:20 13:22 15:3 25:7 27:9 media 12:17 21:2 36:21 39:5,7 medias 21:4 meet 36:10 meeting 11:25 19:21 20:1,4 20:10 meetings 19:17 20:12,12,21 menander 8:7 mentioned 14:20 message 21:16 midwest 46:1 mile 9:15 22:18 miles 9:16 mind 19:18 minutes 5:12 9:25 10:9,11 mismanaged 12:15 21:25	30:25 mismanagem... 35:22 37:18,19 monday 7:16 monroe 1:2,3 1:11,18,20 17:18 39:10 41:2,4,12 42:14 month 22:5 27:20 monthly 13:12 20:20 29:1 monument 2:9 mooreville 22:21 morning 8:20 mortgage 38:10,15 morton 1:19 41:11 move 6:19 22:11 37:24,25 38:8 moved 13:8 22:1 23:6 moving 22:24 municipal 39:2 musical 9:6	need 5:6,14 7:25 22:12 needs 28:11 neighbor 8:23 17:15 neighbor's 28:13 neighborhood 24:5 27:16 28:7 31:8 35:19 neighborhoods 25:19,20 neighbors 10:7 24:4,6,6,16 never 20:24 new 12:8 22:4,5 25:10 26:5 27:2 34:6,7,15 news 22:9 newspaper 16:20 25:25 night 10:17 nonprofit 19:11 nonresident 27:20 north 1:19 20:9 41:11 northwest 23:3 notarial 42:5 notary 1:18 41:3 42:12 43:25 44:10,18 45:15,23 46:23	noted 4:1 39:21 notice 1:21 np0732235 42:14 number 18:12 18:17 31:3 35:8 43:7 numbers 11:14 45:7
			o
			oaks 8:15,15,16 8:17,18 observation 34:8 37:16 observations 11:8 16:1 occasion 7:25 occurred 27:4 october 6:13 offer 15:7 36:4 office 18:13,21 19:15 43:13 officer 15:10 officers 11:13 12:4 17:2 offices 1:19 41:10 official 44:15 45:21 offshoot 30:7 oh 14:4 32:12 ohio 43:2 okay 14:1,20 20:19 26:1 33:7 35:16
	n		
	name 4:9,10,14 15:18 24:11 28:13 35:13 43:6 44:3,4,15 45:3,4,21		

<p>37:11 39:13 old 15:17 18:8 20:9 27:17 29:12 30:9 38:1 once 9:7 13:13 online 31:25 opera 9:6 operation 33:24 operator 7:9 opinion 33:10 opinions 31:11 oppose 27:15 opposed 16:22 21:22 27:7 29:7 30:23 38:15 opposing 6:6 opposition 21:20 31:2 oral 1:17 ordering 34:15 ordinance 31:17 organization 19:6,10,11,13 20:1,13 orientation 9:18 10:17 11:25 14:22 15:2,13 originally 21:19</p>	<p>outlining 32:2 outreach 32:4 outside 29:6 30:17 overlapping 33:2 overruled 32:17 overview 15:5 16:17 own 6:16 owned 6:11 owners 35:3</p> <p style="text-align: center;">p</p> <p>p.m. 1:20 4:1 39:21 41:14 package 17:8 packaging 23:14 packet 32:9,10 paddington 8:14 page 3:2,7 31:20 34:24 35:6 45:7 46:3 pages 32:12 paid 12:23 16:11 paper 8:21 9:24 16:16 23:20 25:1,2,12 papers 12:17 paragraph 35:12</p>	<p>parcel 31:1 park 8:11 22:20,22 23:2 23:5 27:6 parks 8:9,11 10:19 27:1,2,9 part 7:9,12,18 26:15 27:12 30:5 31:16 45:9 particular 17:22 parties 41:22 party 28:12 42:1,3 passed 4:12 27:18 patrol 11:21 15:10 patrolman 18:24 patterson 7:7 pay 13:3,3,4,5 13:7 17:5 22:16 24:1 27:7 29:1 30:3 30:16 31:6 38:12,12 peek 10:1 people 10:21,22 12:2,6 15:8 16:8 21:15 22:15 25:12,12 25:13,18 28:12 31:13 32:5</p>	<p>35:19,20 37:22 37:23 38:3,3 percent 27:16 27:19,23 31:4 36:11 37:9 perception 35:18 performances 9:2 person 24:14 41:25 personally 31:5 36:15 37:21 44:11 45:15 personnel 11:1 persons 36:14 37:4 petition 6:6 21:18 35:1 petitioners 1:9 2:2 pharmica 23:11 phone 43:3 physically 18:9 picked 13:1 pickups 13:7 pike 29:10 pipes 30:17 pl 1:4 place 1:21 10:10 places 39:14 plan 31:16,23 32:22,23 33:11</p>
---	---	---	--

<p>33:16 34:5 planet 8:5 plans 6:19 plant 29:9 plate 18:16 platform 22:7 plaza 8:6 please 4:9 11:23 34:24 43:13 plus 6:14 point 13:20 police 9:21 10:19,25 11:5 11:7,11,13,15 11:19,24,25 12:7,12,13,18 14:21,22,24,25 15:2,5,20 16:10,13 26:13 26:22 32:25 35:23 37:19 policeman 16:2 population 36:9,10,13 37:3 position 19:16 possibility 34:4 possibly 17:6 20:15 pothole 13:20 potholes 13:18 pre 30:15 prefer 43:15</p>	<p>present 2:15 38:6 presentation 15:10 presented 41:20 pretty 22:22 23:13 previous 33:21 previously 3:7 34:16 primary 9:12 9:13 prior 22:17 probably 4:20 9:4 24:12 30:16 35:24 procedure 1:21 41:15 44:5 45:5 process 4:23 produced 1:17 production 43:23 profit 1:6 program 24:23 25:4,23 programs 27:10,14 property 6:7,12 6:16 9:3 13:8 25:17 28:4 30:10 31:1 38:10,23</p>	<p>proposal 32:2 proposed 36:12 provide 26:6,10 29:4 30:8 provided 13:11 provider 9:12 provides 28:23 providing 26:22 pry 24:19 public 1:18 12:14 15:7 20:12 32:4 36:21,21 41:3 42:12 44:10,18 45:15,23 46:23 published 9:24 pulling 12:1 purchase 24:1 34:2,6 purchased 23:12 43:16 purchasing 32:24 33:21,22 34:12,13 pursuant 1:20 41:14 pushed 17:5 put 12:25 13:6 22:6 25:21 28:6 30:5,7 putting 12:24</p>	<p>q question 5:3 12:5 14:2 20:18 22:6,10 25:9 26:5,7 28:22 34:24 35:6,23 questions 3:3 4:8,25 9:20 11:4 39:17,19 quoted 25:1,2 31:3 quotes 25:12 25:25 quoting 37:1</p>
			<p>r radio 25:3,23 25:24 radius 22:18 raises 17:5 ran 18:3,11,14 22:7 rate 39:2,3 rates 27:15 rating 10:14 14:3,11,14 reach 21:5 read 8:20 12:16 16:20,24 31:18 31:21 39:7 44:5,6,12 45:5 45:6,17 reading 16:22 43:11,18</p>

really 30:8 reason 5:15 8:9 17:19 30:6 45:8 46:3 rec 10:19 27:9 recall 17:3 26:8 26:25 recap 21:25 22:25 receipt 43:18 receive 26:18 received 32:1 33:11 receives 26:19 receiving 30:1 recent 14:22 recently 4:19 recollection 19:20 20:11 37:5 recommendat... 17:1 record 4:9 41:19 45:9 recruiting 15:7 15:15 17:9 reference 43:7 44:2 45:2 referenced 43:10 44:11 45:15 refine 20:18 regular 7:12 20:20	rehash 35:25 reiterate 37:18 relating 4:4 relative 42:1 remember 16:24 17:11 25:8 33:25 38:5 remonstrance 4:16 6:6 21:18 24:17 remonstrators 1:9 removal 26:15 26:23 renominated 12:8 renovated 29:14 repairs 28:10 rephrase 5:6 repointed 12:9 report 31:20 reporter 44:7 reporting 16:25 represented 41:22 request 13:23 45:9,11 required 43:25 requirements 34:12 research 36:8	researched 39:9 residence 17:21 42:13 residents 1:6 3:9 19:7 28:7 34:20 43:6 44:3 45:3 respond 10:12 11:18 18:10 28:9 respondents 1:13,19 2:7 41:10 responder 9:12 9:13 responding 11:8 12:1 15:23 responds 10:8 13:24 response 9:23 10:9 11:5,6 22:12 27:1 restaurants 7:23 retain 12:6 retaliation 24:18 retention 17:7 17:10,11 returned 43:17 review 43:13 44:1 45:1	revived 31:15 right 4:10 5:1,8 5:13 14:5,23 15:23 17:10 18:24 24:22 25:2,5,8 27:11 27:13 28:18,25 29:2,21 31:22 32:19 33:2,4 35:14 38:16 robertson 2:3 role 4:24 roof 12:12 room 1:19 41:12 round 7:19 route 7:5 rules 1:21 41:14 44:5 45:5 run 29:22 running 11:16 runs 16:3 ryan 28:14 s s 45:8,8 46:3 saith 40:1 sanitation 24:1 31:14,14 32:25 33:25 34:1,4 34:13 sat 9:25 11:10 saying 26:16,20 26:21,22 32:4
---	--	--	--

<p>says 10:9 28:9 35:7</p> <p>schedule 7:13 7:15</p> <p>seal 42:5,12 44:15 45:21</p> <p>section 25:14</p> <p>see 15:25 23:17 34:3,22 35:4,8 35:12</p> <p>seem 30:4</p> <p>seems 29:23</p> <p>seen 14:16 36:18,20</p> <p>sell 30:8</p> <p>semi 20:20 24:12</p> <p>seminar 15:12</p> <p>sent 31:18 32:7 32:17</p> <p>september 6:14</p> <p>septic 25:14,24</p> <p>service 9:12 13:5,5,11 24:1 24:2,9 28:17 28:19,24</p> <p>services 12:22 23:25 25:10 26:6,18,23 29:4 30:2 31:14 34:5</p> <p>session 15:7</p> <p>set 7:12 42:4</p> <p>seven 9:24 10:10</p>	<p>sewage 25:13 27:15,21 30:18</p> <p>sewer 27:25 28:3,24 30:2 30:11</p> <p>shared 30:6</p> <p>sharing 26:1</p> <p>sheet 45:7,10 45:18 46:1</p> <p>sheriff's 17:18 18:13,18,20</p> <p>sherwood 8:15 8:15,16,17,18</p> <p>shop 8:2,6,7</p> <p>shopping 7:22</p> <p>short 37:5</p> <p>show 22:9</p> <p>side 8:4 23:8</p> <p>sidewalks 18:1 25:19,20,21,24</p> <p>sign 6:5 18:3,11 18:14 24:17,20</p> <p>signature 6:7,8 39:20 41:21 42:9 43:13</p> <p>signatures 20:16 24:5</p> <p>signed 6:9 21:18 44:13 45:18</p> <p>signing 43:11 43:18</p> <p>sincerely 43:21</p> <p>sir 43:9</p>	<p>sit 10:4 11:14 15:8</p> <p>sitting 10:6 16:3</p> <p>situation 17:22 17:24</p> <p>six 12:10</p> <p>small 18:6</p> <p>snow 26:15,23</p> <p>social 21:2,4</p> <p>solo 6:2</p> <p>solutions 43:1 46:1</p> <p>somebody 16:3 22:9 26:25</p> <p>somewhat 16:17</p> <p>sorry 6:3 14:4 22:4 28:13,14</p> <p>sort 35:17</p> <p>sources 36:24 36:25 39:5</p> <p>south 2:4</p> <p>speak 5:6 37:10</p> <p>speaking 21:1</p> <p>special 13:7</p> <p>specialize 34:14</p> <p>specific 32:22</p> <p>specifically 25:11,15 30:18</p> <p>specifics 7:25</p> <p>spoke 14:25</p> <p>sporting 9:1</p>	<p>square 36:14</p> <p>ss 1:1 41:1</p> <p>staff 33:1</p> <p>staffing 16:12 35:22</p> <p>staged 11:18</p> <p>start 21:14,14</p> <p>started 5:23 18:7 23:11 27:14</p> <p>state 1:1,18 4:9 9:3 32:15 36:8 37:3 39:12 41:1,4 42:12 44:10 45:15</p> <p>statement 18:19 44:13,14 45:19,19</p> <p>station 10:3 11:12,15,17,19 12:12</p> <p>statutes 36:9</p> <p>stenographic... 41:17</p> <p>sticker 34:18</p> <p>stickers 13:3,3</p> <p>stood 18:10</p> <p>stop 16:3 18:2 18:3,11,14 31:10</p> <p>stopped 10:18 32:15</p> <p>street 1:19 7:7 8:5 11:12 17:25 26:23</p>
---	---	---	--

<p>28:3 31:24 41:11 streets 13:16 29:12 31:9 study 16:11,19 16:22 17:1 33:22 stuff 14:7 subleased 29:13 subscribed 44:10 45:14 46:21 sue 24:11 suffering 4:21 suggest 33:15 suite 2:10 43:2 summary 26:7 superior 43:1 supplemental 35:7,8 supplemented 3:8 34:19 supply 29:16 support 37:15 supporting 35:1 supposed 11:2 supreme 32:16 surcharge 27:19,23 sure 5:16 6:21 26:3 surrendering 25:6</p>	<p>swat 15:9 swearing 18:7 sworn 1:17 4:3 41:6 44:10,13 45:14,18 46:21 systems 27:21</p> <p style="text-align: center;">t</p> <p>table 34:17 take 5:14 7:5 18:19 taken 1:18 41:9 41:16 43:10 talk 31:10,10 talked 10:22 14:21 18:21 24:15,16 35:20 35:21,25 36:7 37:14 talking 10:20 16:18 22:8 24:6 tank 25:14,24 tax 31:13 39:2 39:3 taxation 37:21 taxes 10:23,24 12:21 23:18 24:8 31:1,6 38:12 taxing 33:2 team 15:9 tech 31:25 technical 23:2 23:5</p>	<p>technology 4:24 tell 4:3 41:6 ten 7:3 term 8:22 territory 35:3 testified 4:5 35:17 testify 15:25 24:11,13 35:9 35:10 testimony 24:14 26:9 36:3 41:19 44:6,7 45:6,9 45:12 text 21:16 thank 6:4 15:2 23:17 39:17,19 thereof 1:21 thing 36:4 things 30:25 34:11 35:24 think 19:22 20:14,16 26:9 26:21,21,25 29:25 30:11,15 30:19 37:15,25 thinking 9:8 third 24:2 28:12 thirty 43:17 thoroughly 31:19</p>	<p>thought 15:4 23:9 37:24 thoughts 32:6 threatened 18:8,9,15 three 10:9 20:11,11 28:2 36:23,25,25 37:4 threw 29:11 throw 29:8 thursday 7:17 till 11:3 time 1:21 4:1 6:5 7:9,12,18 8:6,6 9:23 10:1 10:10,24 11:5 11:6 15:11 21:11 31:3 34:12 39:17,21 times 36:24 title 34:19 today 17:13 told 4:12 18:22 27:14 38:24 total 13:13 township 9:15 20:4,9 traffic 10:1,5 10:13 12:2 15:24 transcribed 41:17 44:7 transcript 41:18 43:10,15</p>
--	--	---	---

<p>44:5,12 45:5 45:11,17 transit 7:1,4,8 7:20 11:10 33:23 transport 13:22 travel 22:18 trial 1:21 41:15 tried 18:5 trimming 20:7 trucking 4:21 trucks 10:5 true 41:19 truth 4:3,4,4 41:7,7,7 truthfully 5:1 try 17:9 trying 5:12 6:22 10:11 tuesday 7:16 turn 21:1 23:5 29:21 34:24 35:6 tv 25:4 two 5:24 12:21 12:22 13:2 20:14 28:3 29:11 31:9,22 36:8,23,24,24 36:25 37:20 typewritten 41:18</p>	<p style="text-align: center;">u</p> <p>ultimate 16:25 unaware 21:6 under 9:14 22:2 33:17,18 35:7 37:3 41:17 undermanned 12:3 16:6 underpaid 17:4 understaffed 12:3,18,19 15:21 16:7 28:9 37:19 understand 4:24 5:3 16:8 20:20 21:19 25:2 26:2,16 27:3 36:2 37:13 understanding 9:11 12:4 14:9 14:13,18 19:9 20:3 26:8 29:15 30:7 33:10 37:2,6 understood 5:10 uneven 13:18 university 9:1 update 14:16 uproar 12:15 use 8:4 9:3 users 27:20</p>	<p>utilities 28:8 29:22 utility 28:23 35:23</p> <p style="text-align: center;">v</p> <p>v 43:6 44:3 45:3 vaccines 23:16 vacuum 13:9 van 20:2,4 vastly 33:8,23 38:2 vehicles 11:16 verify 14:10 veritext 43:1,7 46:1 view 22:18 views 31:11 village 8:3 38:1 violations 12:2 15:24 virus 23:14 voice 25:3 vs 1:10</p> <p style="text-align: center;">w</p> <p>wait 11:15 waived 43:12 43:19 walk 17:25 30:20 31:7 walking 18:1 walmart 8:8 walnut 11:11 11:17</p>	<p>want 26:2,3 35:25 wanted 9:22 14:10,10 29:10 37:12,13 wants 31:10 warehouses 23:4 washington 20:9 watch 10:4 water 25:13 27:15,21,25 28:3,17,23 29:11,17 30:1 30:8,8 way 16:3 18:2 29:25 33:13,14 we've 35:25 wednesday 7:17 25:6 week 7:13,13 15:9,12 weekly 13:9,12 went 10:21 11:25 12:13,21 12:22,23,24 13:4,12 19:21 20:1 23:18 24:4 27:16 32:16,24 west 5:18,21 6:11 8:4,5 9:9 9:25 11:11</p>
---	--	---	--

western 7:6 westfield 39:15 wfiu 26:5 whereof 42:4 whitehall 8:6 wife 5:23,24 6:5 38:24 william 2:3 willing 24:11 wilson 15:19,20 winter 26:15 witness 1:17 17:12 42:4 43:8 44:1,4,11 45:1,4,15 wjbeegs 2:5 woke 8:20 work 6:23,25 7:12 28:12 34:11 worked 4:20 7:2 33:21,23 working 7:20 11:9 works 28:8 worried 31:13 written 1:21 18:22 wrong 14:15 30:22	year 13:13 34:14 years 4:20 5:24 6:15 7:3 8:11 9:5 12:10,21 12:21,22 15:16 16:12 23:1 27:17 28:5 30:16 yelled 18:5 young 15:16 younger 8:12
	z
	zoned 37:9
y	
yeah 23:17 27:12 28:16,16 33:6 36:16 38:8	

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.