

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

4 IN THE CIRCUIT COURT OF MONROE COUNTY

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

6 COUNTY RESIDENTS AGAINST ANNEXATION,)
INC., an Indiana not for profit)
7 corporation, et al.,)

8 Remonstrators/Appellants/Petitioners,)

9 -vs-)

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

12 Respondents.)
13

14 DEPOSITION OF MEGAN PARMENTER
15

16 The deposition upon oral examination of
MEGAN PARMENTER, a witness produced and sworn
17 before me, Janine A. Ferren, RMR, CRR, CSR-IL
No. 84-4852, Notary Public in and for the County of
18 Hamilton, 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 10:30 a.m., pursuant to
the Indiana Rules of Trial Procedure with written
21 notice as to time and place thereof.
22
23
24
25

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1 APPEARANCES

2 FOR THE REMONSTRATORS/APPELLANTS/PETITIONERS:

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10 FOR THE RESPONDENTS:

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21 ALSO PRESENT:

22 Margaret Clements

23

24

25

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1 INDEX OF EXHIBITS

2 Deposition Exhibit No.: Page

3 Exhibit 50 - Typewritten notes beginning 15

4 with "Schools lose \$50,000"

5 Exhibit 51 - LowTaxInfo document for 3144 18

6 South Cuffers Drive

7 (BLOOMINGTON_199094 - 199096)

8

9 Previously Marked Exhibits: Page

10 Exhibit 28 - Amended and Supplemented 26

11 Answers of County Residents

12 Against Annexation, Inc. to

13 City of Bloomington's

14 Interrogatories

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1 INDEX OF EXAMINATION

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3 DIRECT EXAMINATION5

4 Questions by Andrew M. McNeil

5 CROSS-EXAMINATION 33

6 Questions by William J. Beggs

7 DIRECT EXAMINATION 34

8 Questions by Andrew M. McNeil

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1 (Time noted: 10:24 a.m.)

2 MEGAN PARMENTER,

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 Please state your name for the record.

10 A Megan Parmenter.

11 Q Ms. Parmenter, my name is Andrew McNeil. I'm

12 one of the attorneys for the City of Bloomington

13 in this remonstrance annexation matter.

14 Have you ever given deposition testimony

15 before?

16 A I have not.

17 Q So the process is pretty simple. I'm going to

18 ask you a series of questions, and your

19 obligation is to answer them as completely and

20 as truthfully as you can. Do you understand

21 that?

22 A Yes.

23 Q If you don't understand my question, will you

24 let me know?

25 A Yes.

<p style="text-align: right;">Page 6</p> <p>1 Q If you need me to rephrase it or if you didn't 2 hear me, please let me know that too. Okay? 3 A Yes. 4 Q This isn't going to last all that long, maybe 5 30 minutes. 6 A Uh-huh. 7 Q But even so, if you need to take a break for any 8 reason, please let me know that. 9 A Yes. 10 Q Did you do anything to get ready or prepare for 11 the deposition today? 12 A I thought about the reasons why that I'm opposed 13 to annexation. 14 Q And I'm going to ask you about those in a few 15 minutes. 16 Anything else you did to prepare? 17 A No. 18 Q Did you make any notes, write anything down? 19 A I took some personal notes, yeah. 20 Q Just to organizing your thoughts? 21 A Yes. 22 Q What's your address? 23 A 3144 South Cuffers Drive, Bloomington, Indiana 24 47403. 25 Q Is that in Annexation Area 1B?</p>	<p style="text-align: right;">Page 8</p> <p>1 is much less than the home I could afford in the 2 county, in addition to space and the taxes. 3 Q But when you're talking affordability there, 4 you're talking the purchase price? 5 A The purchase price and the monthly mortgage and 6 the taxes and the insurance, yes. 7 Q Do you have a mortgage currently? 8 A I do. 9 Q Do your property taxes currently get paid out of 10 your escrow account? 11 A Yes, they do. 12 Q So your monthly payment may fluctuate from year 13 to year as they update the escrow account? 14 A Slightly, yes. 15 Q Where do you work? 16 A I work at the Monroe County Community School 17 Corporation. 18 Q What do you do there? 19 A I teach sophomore English. I'm the sophomore 20 class sponsor and the National Honor Society 21 advisor. 22 Q How long have you worked there? 23 A I've worked at the school corporation for 16 24 years, and at Bloomington High School South for 25 nine years.</p>
<p style="text-align: right;">Page 7</p> <p>1 A It's in 1B. 2 Q How long have you lived there? 3 A I've lived there for 12 years. I bought the 4 condo in July of 2012. 5 Q Does anybody live there with you? 6 A No. 7 Q Do you have any plans to move? 8 A Not at the moment, no. 9 Q Something you've thought about in the next six 10 months to a year? 11 A In possibly the next year, yes. 12 Q Does whether you move or not have anything to do 13 with how the annexation turns out? 14 A Homes that I have looked at just on Zillow or 15 other places, I've considered places that are 16 not in the city limits and that are not in 17 Area 1B at this time so I would not be concerned 18 with the taxes that are increased in the city. 19 Q So is it fair to say that, from that answer, do 20 I -- start over. 21 Are you saying that when you're looking on 22 Zillow, you're not looking inside of Bloomington 23 city limits? 24 A It's a consideration. But the home that I could 25 afford within the city limits as a single person</p>	<p style="text-align: right;">Page 9</p> <p>1 Q So we pulled you out of class for this? 2 A I took off work, and the \$12 did not cover the 3 half a day to take off work. 4 Q Take that up with the Indiana General Assembly. 5 A Yes. 6 Q All right. So -- 7 A But I took off work because this is important to 8 me and I wanted to be here. 9 Q Okay. So you would have come without the \$12, 10 is what you're saying? 11 A Yes. 12 Q Did you come from home to here? 13 A I worked a half a day. 14 Q So you came from the school to here? 15 A Yes. 16 Q When you came from the school to here, what 17 route of travel did you take? 18 A I drove on city roads. 19 Q When you go from your home to work, how do you 20 get there? 21 A I drive on a county road and then a city road. 22 Q Did you sign a remonstrance petition opposing 23 the annexation? 24 A I signed the petition, yes. 25 Q Was that in the fall, roughly fall of 2021?</p>

Page 10

1 A Yes.

2 Q When you signed that petition, did you

3 understand that you were expressing your

4 opposition to the annexation?

5 A Absolutely.

6 Q So here's the question. It's a broad question.

7 We'll get your answer, and then we'll go back

8 through some of the details.

9 A Sure.

10 Q So please tell us all the reasons why you oppose

11 the annexation.

12 A Okay. First of all, as an employee of the

13 Monroe County Community School Corporation, our

14 district is losing \$50,000, to my knowledge at

15 the time, which may not seem like a lot in the

16 grand scheme of our school budget. But thinking

17 about the cuts that we have to make or the

18 referendums that we have to pass to have the

19 programs that we need for our students to be

20 successful in school and in life, then that's

21 important to me that our schools are funded.

22 I'm concerned that we would be serviced by

23 the same township fire department. Our

24 Bloomington Police Department is already

25 understaffed. I believe that we're funded

Page 11

1 for -- the city is funded for 105 but there's

2 only 84 officers. And how are we going to have

3 14,000 more residents covered by those same 85

4 officers?

5 My neighborhood is a townhouse

6 neighborhood. And so the City has said,

7 Attorney Mike Rooker, our neighborhood is

8 managed by Capital Realty. Carole Damon is our

9 property manager. I'm on the homeowners

10 association board. We asked her to investigate

11 on behalf of our Brentwood neighborhood to find

12 out what would the annexation involve for our

13 neighborhood. She was told by City Attorney

14 Mike Rooker that the city would not take in our

15 streets, that they would not take in our trash

16 unless we signed waiver of liability that, if

17 they damaged our streets, that the City was not

18 responsible.

19 That's very concerning to me, because I'm

20 going to be paying the same tax rate as anyone

21 else who lives in the county neighborhood to get

22 to my neighborhood, and then I would still have

23 to pay for private snow removal, private street

24 maintenance, private trash removal. And I feel

25 like, if I'm going to be paying the taxes for

Page 12

1 the services, that I should receive the

2 services.

3 To your point earlier about I drove a city

4 road to get here. I drive on a lot of roads. I

5 drive to Greene County every week and I don't

6 pay for their roads, to drive on their county

7 roads. So to me, I'm paying for the roads that

8 I drive on most often. I take -- my family

9 lives in town. I take the county road to get to

10 their house. And I do take a city road to get

11 to my work, and I am taxed on my income for

12 working in Monroe County. And so I think that

13 that is covered through that.

14 My notes that I prepared, I do have them

15 with me. Would you mind if I just checked to

16 make sure I've covered my points?

17 Q I don't mind, as long as you don't mind letting

18 me see them.

19 A That's just fine.

20 Q Okay. We have a deal.

21 A Thank you. I just would hate to get to the car

22 and then have forgotten something.

23 Q No, we don't want that. This is your

24 opportunity, so we want to get it in the record.

25 A I think my only other point was that I know that

Page 13

1 there are city services like the city parks.

2 And if I want to participate in something and

3 there's a rate that I would pay that is higher,

4 and I would be willing to pay that higher rate

5 than a city resident would get, you know -- if

6 it was a \$50 program, the county resident might

7 pay 70. I'm fine to pay that. I do not use the

8 city parks. Anytime I have used it -- actually,

9 I've co-chaired an event, the Strawberry

10 Shortcake Festival, and we've paid to use that

11 facility.

12 So for the argument that I could benefit

13 from the parks, I don't use the parks. I

14 actually would use the county parks more than

15 the city parks and participate in the county

16 programs, like I did in the fall with the

17 Indiana Master Naturalist.

18 Q The what?

19 A The Indiana Master Naturalist program was

20 offered through the county. Just because it's

21 offered doesn't mean I'm taking advantage of it.

22 And I believe that that covers my notes

23 from my big points of why, especially the paying

24 for taxes that I would not receive the services

25 in my particular neighborhood, is my -- very

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1 much a concern, and our schools losing funding.
 2 We've had to pass two referendums in the
 3 last two years due to reduced funding, and our
 4 community has been supportive of those. But
 5 having two school referendums, the income tax
 6 increase, and then now wanting to annex another
 7 14,000 people, are four big hits.
 8 So I have lived at my townhouse for
 9 12 years, and that was kind of a five-year plan,
 10 and things go how they go. I would like more
 11 space, but I've really been confined to stay in
 12 there, because in this community, that's what I
 13 can afford on a single person's income. And so
 14 when looking at homes, then you're more confined
 15 to the county because the city is not
 16 affordable.
 17 Q I will point out --
 18 A Sure.
 19 Q -- on your notes there's a line, I don't think I
 20 heard you say this, but it says, "Taxes will
 21 increase by \$872, but I will not benefit from
 22 any additional services."
 23 You certainly said services --
 24 A I said -- I just didn't directly, but say that
 25 that's the amount that the City posted or sent

Page 15

1 to me, that my taxes would be increased by
 2 \$876 --
 3 Q And then when you --
 4 A -- at the time.
 5 Q Right.
 6 A And so with the increased property values in the
 7 last few years, which is great that my property
 8 is worth more, but then if I'm trying to buy
 9 locally and stay in our community, then that
 10 reflects in everybody else's selling price too.
 11 And I don't know how that will reflect in my
 12 property tax.
 13 Q Can we keep these --
 14 A Absolutely.
 15 Q -- and make them a part of the deposition
 16 record?
 17 A Sure. I would have typed it up nicer.
 18 Q I'm going to show it to Mr. Beggs here too.
 19 A I can send him a copy as well.
 20 (Deposition Exhibit 50 marked for
 21 identification.)
 22 Q On your note there was a date for the
 23 conversation that Mike Rooker had with the
 24 property manager of about August 27, 2021.
 25 A Yes.

Page 16

1 Q And then the typeface on the document, it looks
 2 like it was copied and pasted?
 3 A Yes, it was.
 4 Q So what was the process for that?
 5 A Carole Damon had a phone conversation with Mike
 6 Rooker and then immediately emailed our
 7 homeowners association board. And so I copied
 8 that -- I wasn't -- I don't know Mike Rooker,
 9 and so I wanted to remember his name. So that's
 10 why I copied the text from Carole's email.
 11 That was her summary from her phone
 12 conversation that same day with Mike Rooker.
 13 Q Then the \$872 in property tax increase, where
 14 did that figure come from?
 15 A The City website. When I typed in my address,
 16 that's the amount that comes up as the gross
 17 difference.
 18 Q When was the last time you ran the tax analysis
 19 on the City website, roughly?
 20 A Yesterday.
 21 Q And it was --
 22 A But that's based on 2021.
 23 Q Sure.
 24 A There's a lot of information on that that is not
 25 up to date with what's going on now. And there

Page 17

1 are many homeowners on that list just in my own
 2 neighborhood that have moved since and that's
 3 not the same people that are there, even from
 4 when we were collecting signatures.
 5 Q Right. And do you know what your property tax
 6 payments were through your escrow company in
 7 2023?
 8 A I think they're about \$900.
 9 Q Per?
 10 A I think it was about -- it's double. My
 11 property taxes will double with this.
 12 Q So --
 13 A If I am to be annexed, my property taxes will
 14 double. So my current is about \$900, and the
 15 addition is about \$900.
 16 Q But it's \$900 --
 17 A Per year.
 18 Q -- per payment? 900 in the spring, 900 in the
 19 fall; correct?
 20 A Currently it's like 450.
 21 Q Oh, okay.
 22 A To my understanding, it's about 450 in the fall
 23 and 450 in the spring. That's my fault for not
 24 looking at my -- I have it paid automatically
 25 and I know what my payment is and it resets

Page 18

1 every August.
 2 MR. McNEIL: This will be Exhibit 51.
 3 (Deposition Exhibit 51 marked for
 4 identification.)
 5 Q Ms. Parmenter, you have Exhibit 51 in front of
 6 you?
 7 A Yes.
 8 Q At the top upper left-hand corner it says,
 9 "LowTaxInfo," and on the right side it says,
 10 "Monroe County" on the first page.
 11 Do you see that?
 12 A Yes.
 13 Q Then does that 3144 South Cuffers Drive, that's
 14 your address?
 15 A Yes, it is.
 16 Q If you look on the second page, in the bottom
 17 right-hand corner there's page numbers, it's
 18 ending in 095. Do you see that?
 19 A Yes, I do.
 20 Q There's a "Tax History" section. In the bottom
 21 third of the page it has the 2023 line for
 22 spring and fall and total tax. Do you see that?
 23 A Yes, I do.
 24 Q The total tax for 2023, according to this, was
 25 \$1,740.28. Do you see that?

Page 19

1 A Yes, I do.
 2 Q And then equals installment payments in the
 3 spring and fall of \$870.14. Do you see that?
 4 A Yes, I do.
 5 Q Does that refresh your recollection at all on
 6 what your tax is?
 7 A Yes, it does. So I would probably be referring
 8 to the pre-COVID times when it was around the
 9 \$900 a year. As I mentioned, it's paid
 10 automatically through my mortgage escrow
 11 account, and so divided out among the 12 months'
 12 payments.
 13 Q Yes.
 14 A Then if it influxes a little, then that's not as
 15 noticeable.
 16 Q Right.
 17 A Definitely from 2019 to 2023, a \$700 jump, but
 18 incrementally not as noticeable.
 19 Q Right. And just -- I just want the record to be
 20 clear. I'm not suggesting --
 21 A Yes.
 22 Q -- that you were not being forthcoming. I just
 23 understand you have an escrow payment and they
 24 pay the bill.
 25 But as you noted, the taxes have increased

Page 20

1 based on the increase in assessed value,
 2 according to Exhibit 51, but you've managed to
 3 pay your -- or your escrow company has paid all
 4 your property tax bills on time, as far as you
 5 know?
 6 A Absolutely.
 7 Q So we're done with that.
 8 A Okay.
 9 Q You mentioned that the school corporation stood
 10 to lose \$50,000?
 11 A Yes.
 12 Q What is your understanding of that based on?
 13 A Based on the property tax cap and how the
 14 funding would work, with the City receiving
 15 increased taxes and the County less, with what
 16 they can collect. I don't have a solid
 17 understanding of that. I know that was
 18 information shared in 2021 by both sides, that
 19 this is a consequence or, you know, from the
 20 City's side even, the schools would lose this
 21 and spin it to how it works for the City, so ...
 22 Q But it was information that you received during
 23 an informational meeting or through resources?
 24 A Through resources at the time.
 25 Q And do you understand that as the assessed

Page 21

1 values of the county and the taxing districts
 2 increase, the amount of money available to the
 3 taxing authorities increases as well?
 4 A No, because of the property tax cap. My
 5 understanding is that, while there may be some
 6 additional funding, the schools would have
 7 gotten that through the county. So maybe they
 8 would have gotten additional through the county,
 9 but that source of revenue is no longer
 10 available because those residents would now be
 11 paying it to the City.
 12 Q Right. But just in terms of total -- as a
 13 school employee, do you see the school's
 14 financial statements ever, what their revenue is
 15 per year?
 16 A I look at the school board agendas every month.
 17 And if there's information posted, I do read
 18 that.
 19 As I said, that the -- I know that's not a
 20 lot in the grand scheme. But if you're looking
 21 at maybe our classrooms need new desks, and
 22 \$50,000 would cover the English department's
 23 school desks, then that makes a significant
 24 difference for the learning environment of our
 25 students.

Page 22

1 Q Have you observed, in your review of the board
 2 agenda or meeting minutes, that the top-line
 3 revenue figure that the school corporation
 4 receives on a yearly basis has increased from
 5 2019 to present?
 6 A I have not looked at the numbers from 2019 to
 7 present.
 8 Q Or just anytime in the last two or three years,
 9 have you --
 10 A Our increase has come from two referendums
 11 passed by our community.
 12 Q Are you aware of any increased revenue to the
 13 school corporations resulting from the increase
 14 in assessed value within the taxing direct?
 15 A I am not aware of that.
 16 Q You said you would be serviced by the same
 17 township fire department. What do you mean by
 18 that?
 19 A The township fire department that services my
 20 home now would be the same one that would
 21 service my home if I were to be annexed, is my
 22 understanding.
 23 Q Which township are you in?
 24 A I am in Perry Township.
 25 Q Does Perry Township participate in the Fire

Page 23

1 Protection District?
 2 A It is my understanding they do.
 3 Q You mentioned the understaffing at the police
 4 department. What is your knowledge or
 5 understanding of that issue based on?
 6 A I've watched city council meetings, I read the
 7 Herald-Times, the Indiana Daily Student, I know
 8 police officers.
 9 I think it's a very widely known fact that
 10 Bloomington Police Department is understaffed.
 11 And in my notes, I found an Indiana Daily
 12 Student article just from September of 2023,
 13 that that's where I got my numbers.
 14 Q You say you know police officers. Are you
 15 saying you've spoken with them about the
 16 staffing issues?
 17 A Yes.
 18 Q When was the last time you spoke to a police
 19 officer about the staffing issues?
 20 A I don't recall.
 21 Q Is it in this calendar year or --
 22 A No.
 23 Q -- longer ago than that?
 24 A Longer than that.
 25 Q Are you aware of a study that the City of

Page 24

1 Bloomington commissioned to evaluate the
 2 staffing levels at the police department around
 3 2020 or so?
 4 A I don't recall details, but I do remember
 5 reading about it.
 6 Q Either in one of those news sources that you
 7 identified?
 8 A Yes.
 9 Q Have you ever reviewed the report from the
 10 consulting group directly?
 11 A From the consulting group?
 12 Q Right.
 13 A No.
 14 Q So your knowledge would be based on what you've
 15 read through news sources, what you've observed
 16 at city council meetings, and information
 17 received directly from police officers; is
 18 that --
 19 A Yes.
 20 Q -- a fair summary?
 21 A Yes. I know that our city has increased
 22 civilians in working with the police department.
 23 And while that's commendable that there are
 24 people that would want to do that job, I think
 25 it's very dangerous to send civilians into

Page 25

1 situations who are unarmed and unprepared for
 2 what they may encounter.
 3 Q Are you familiar with the training that those
 4 civilians receive?
 5 A Not specifically.
 6 Q On the city parks, you mentioned the strawberry
 7 festival?
 8 A Yes.
 9 Q And that the strawberry festival paid some fee?
 10 A The Strawberry Shortcake Festival, sponsored by
 11 the Auxiliary to the Boys & Girls Clubs of
 12 Bloomington, which has three clubs: two in the
 13 city and one in Ellettsville, and is expanding
 14 to Owen County. The Strawberry Shortcake
 15 Festival paid Switchyard Park Pavilion to rent
 16 the facility.
 17 Q Have you participated -- other than using the
 18 pavilion as part of the Strawberry Shortcake
 19 Festival, have you participated at any other
 20 parks department programs that required a fee?
 21 A I do not participate in parks department
 22 programs.
 23 Q But you testified, I believe, that you
 24 understand that there's a difference between an
 25 in-city user --

Page 26

1 A Yes.

2 Q -- and an out-of-city user?

3 A Absolutely.

4 Q You mentioned that Indiana Master Naturalist

5 program. What was that through?

6 A That was through the county parks and

7 recreation, Monroe County Parks and Rec.

8 Q Was it at a particular park?

9 A It was at Karst Farm Park in the county.

10 Q Other than the Master Naturalist program, are

11 there other county programs you participate in?

12 A No.

13 Q When was that program?

14 A That was fall of 2023. It was a 24-hour course

15 over the course of eight Thursdays. Through the

16 program we had an opportunity to volunteer at

17 different community events that were hosted at

18 Karst Farm Park.

19 (Deposition Exhibit 28 previously marked

20 for identification.)

21 Q In front of you is a document with an exhibit

22 sticker on it, Exhibit 28.

23 A Yes.

24 Q If you would turn to page -- first, the title,

25 do you see what the title is? It's the county

Page 27

1 residents' answers to amended and supplemented

2 answers to interrogatories?

3 A Yes.

4 Q If you turn to page 2, please, question 3 says,

5 "Identify each fact witness that you plan to

6 call to testify in this lawsuit and provide a

7 summary of their anticipated testimony."

8 Do you see that?

9 A Yes, I do.

10 Q Now, if you turn to page 4, do you see your name

11 is second from the bottom?

12 A Yes.

13 Q It says, "If called, Ms. Parmenter would be

14 asked to testify as a landowner about her

15 opposition to annexation, city services versus

16 other provided services, and the impact of

17 annexation upon her and upon other

18 institutions."

19 Do you see that?

20 A Yes, I do.

21 Q You've talked about several things, you've

22 identified several things, we've looked at your

23 notes. Is there anything else about the

24 annexation, your opposition to it, city services

25 versus other provided services, or the impact of

Page 28

1 the annexation upon you or other institutions

2 that we haven't talked about?

3 A So this is my time to just say if we've missed

4 anything?

5 Q Yes.

6 A Okay, thank you.

7 Well, I do think that there are many people

8 who were unaware of the annexation. I know that

9 certified letters were sent in the mail. Some

10 people don't pick those up for whatever reason.

11 I thought that this was important enough

12 that, when I heard about it and knew that

13 signatures were needed to remonstrate, then I

14 collected signatures. And I went door to door

15 to homes in my neighborhood and the surrounding

16 area. Many people would not open the door. I

17 have on the back of the clipboard who I was, so

18 if someone saw on a Ring camera or looked out

19 their window. Personally, if someone came to my

20 door, I would not feel comfortable answering the

21 door.

22 So I understand why many people didn't come

23 when there were people at their door knocking.

24 I don't think it's because that they didn't

25 believe that, you know, that they wanted to be

Page 29

1 annexed. But other people I reached out via

2 email or some other way that I had to contact,

3 actually got back to me after the closing date,

4 I believe it was January 6th or around that that

5 we had to have the signatures submitted, and

6 they got back to me like a week later or

7 something. And it was important; they didn't

8 realize it was such a deadline.

9 I know that the Herald-Times is our local

10 newspaper and used to have a circulation of

11 maybe 30,000 people a day, and this is a comment

12 that I heard directly from a retired reporter.

13 And when I heard him make that statement

14 probably about two years ago, he said that it

15 was down to 8,000 people per day. And people

16 are not in tune with the local news like they

17 used to be, because they're maybe reading it on

18 Facebook and don't get the whole information, or

19 it's become too costly and they can't afford

20 that, and they don't -- they can't afford the

21 paper, to subscribe, because the local news

22 doesn't seem to be prompt and it might be a week

23 later reporting.

24 And so I think people didn't -- I think if

25 every single person that didn't sign were

Page 30

1 actually asked if they were in favor of being
 2 annexed, then we would have had well over the
 3 required signatures to not be having the
 4 conversations today, and annexation would have
 5 ended.
 6 Q And that's your belief just based on your role
 7 in opposing the annexation, the interactions
 8 you've had with people and communications
 9 with --
 10 A That's my personal belief based on interactions
 11 that I've had with people. And when I have
 12 conversations with them about why I oppose
 13 annexation, it's not like they're forced to
 14 agree because they want to agree with what Megan
 15 has to say. But they see the validity in these
 16 points, in not receiving the services that would
 17 be paid for. And the increase in taxes, what
 18 may do to them, if it's a retired person, would
 19 have a different impact on their monthly or
 20 yearly budgeting than it does to me who is
 21 working and has many work years ahead of myself.
 22 So I strongly believe that if everyone were
 23 informed and given a way to sign that was
 24 convenient for them, that they would have
 25 signed -- many people, many more people would

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1 have signed against annexation.
 2 MR. McNEIL: We're going to take a break
 3 off the record. I'm going to go talk with
 4 Steve. You may talk with Mr. Beggs or
 5 Mrs. Clements, that's fine. Then we'll come
 6 back and see if there's any further questions.
 7 THE WITNESS: Okay.
 8 MR. McNEIL: You can think of anything else
 9 you wanted to add while we're off the record.
 10 If anything comes to mind, just let me know when
 11 we get back on the record.
 12 THE WITNESS: All right.
 13 (A recess was taken between 10:56 a.m. and
 14 10:58 a.m.)
 15 BY MR. McNEIL:
 16 Q Ms. Parmenter, I just want go back to your
 17 neighborhood.
 18 A Yes.
 19 Q Does the neighborhood association pay currently
 20 for someone to maintain the road?
 21 A Yes.
 22 Q Who do they use?
 23 A We pay snow removal.
 24 Q Do you know what company?
 25 A Nature's Link.


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1 Q Do you understand that that's a private road?
 2 A I do. And when I bought the home, I did know
 3 that it's a private road. And as part of the
 4 homeowners association, I would pay for the snow
 5 removal and for trash removal, which is from
 6 Ava's Trash.
 7 But I'm not -- but the -- they're not
 8 trying to take me over. The City is drawing me
 9 in. And when you look on the website that says,
 10 "These are the benefits that you will receive,"
 11 it says "Areas annexed into Bloomington receive
 12 enhanced services including trash and recycling
 13 curbside collection, street and sidewalk/path
 14 construction and maintenance."
 15 And so if that's advertised by the City,
 16 then I should receive those services, regardless
 17 if I privately pay for that now or not, because
 18 the City wants to take in my neighborhood.
 19 Q Sure. I guess I'm asking a slightly different
 20 question, so let me ask it this way.
 21 A Okay.
 22 Q Do you know, does the County do anything
 23 currently, does Monroe County do anything
 24 currently to maintain the road you live on?
 25 A They do not.

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1 MR. McNEIL: Those are all the questions I
 2 have for you.
 3 THE WITNESS: Thank you.
 4 CROSS-EXAMINATION,
 5 QUESTIONS BY WILLIAM J. BEGGS:
 6 Q Megan, I think I heard you say, when you were
 7 answering questions of Mr. McNeil, words to the
 8 effect that a home in the city would be a lot
 9 cheaper than a home in the county.
 10 Did I hear that correctly? And if so, was
 11 that what you meant to say? Because the things
 12 before and after didn't seem to line up.
 13 A Okay.
 14 Q So help us understand.
 15 A Thank you for clarifying, because that is not
 16 what I meant.
 17 In my search for homes, homes within the
 18 city limits are more expensive than homes within
 19 the county. And you get more square footage in
 20 the county and you have lower property taxes in
 21 the county because you're receiving the county
 22 services rather than the city services.
 23 So on a single income when I'm looking for
 24 somewhere, then I'm looking in the county. Or
 25 if I am looking in the city, then it's a

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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
 10 Janine A. Ferren
 11
 12 Seal, Notary Public My Commission Expires:
 13 State of Indiana April 22, 2024
 14 Janine A. Ferren County of Residence:
 Commission No. NP0681591 Hamilton
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

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1 DEPOSITION REVIEW
 CERTIFICATION OF WITNESS
 2
 3 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
 4 WITNESS' NAME: Megan Parmenter
 5 In accordance with the Rules of Civil
 Procedure, I have read the entire transcript of
 6 my testimony or it has been read to me.
 7 I have made no changes to the testimony
 as transcribed by the court reporter.
 8
 9 _____
 Date Megan Parmenter
 10 Sworn to and subscribed before me, a
 Notary Public in and for the State and County,
 11 the referenced witness did personally appear
 and acknowledge that:
 12
 13 They have read the transcript;
 They signed the foregoing Sworn
 Statement; and
 14 Their execution of this Statement is of
 their free act and deed.
 15
 I have affixed my name and official seal
 16 this ____ day of _____, 20____.
 17
 18 _____
 Notary Public
 19

 Commission Expiration Date
 20
 21
 22
 23
 24
 25

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1 Veritext Legal Solutions
 1100 Superior Ave
 2 Suite 1820
 Cleveland, Ohio 44114
 3 Phone: 216-523-1313
 4 March 15, 2024
 5 To: William J. Beggs, Esq.
 6 Case Name: County Residents Against Annexation, Inc., et al. v. The
 Common Council Of The City Of Bloomington, Monroe County, Indiana, et
 7 al.
 8 Veritext Reference Number: 6465811
 9 Witness: Megan Parmenter Deposition Date: 3/1/2024
 10 Dear Sir/Madam:
 11 The deposition transcript taken in the above-referenced
 12 matter, with the reading and signing having not been
 13 expressly waived, has been completed and is available
 14 for review and signature. Please call our office to
 15 make arrangements for a convenient location to
 16 accomplish this or if you prefer a certified transcript
 17 can be purchased.
 18 If the errata is not returned within thirty days of your
 19 receipt of this letter, the reading and signing will be
 20 deemed waived.
 21
 Sincerely,
 22
 23 Production Department
 24
 25 NO NOTARY REQUIRED IN CA

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1 DEPOSITION REVIEW
 CERTIFICATION OF WITNESS
 2
 3 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
 4 WITNESS' NAME: Megan Parmenter
 5 In accordance with the Rules of Civil
 Procedure, I have read the entire transcript of
 6 my testimony or it has been read to me.
 7 I have listed my changes on the attached
 Errata Sheet, listing page and line numbers as
 8 well as the reason(s) for the change(s).
 9 I request that these changes be entered
 as part of the record of my testimony.
 10
 I have executed the Errata Sheet, as well
 11 as this Certificate, and request and authorize
 that both be appended to the transcript of my
 12 testimony and be incorporated therein.
 13
 14 _____
 Date Megan Parmenter
 15
 Sworn to and subscribed before me, a
 16 Notary Public in and for the State and County,
 the referenced witness did personally appear
 and acknowledge that:
 17 They have read the transcript;
 They have listed all of their corrections
 18 in the appended Errata Sheet;
 They signed the foregoing Sworn
 19 Statement; and
 Their execution of this Statement is of
 20 their free act and deed.
 21 I have affixed my name and official seal
 22 this ____ day of _____, 20____.
 23
 24 _____
 Notary Public

 Commission Expiration Date
 25

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

4	PAGE/LINE(S) /	CHANGE	/REASON
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			

20 Date Megan Parmenter
 21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
 22 DAY OF _____, 20_____.
 23 _____
 24 Notary Public
 25 _____
 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.

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.

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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.

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