

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.
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APPEARANCES

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ALSO PRESENT:

Margaret Clements

INDEX OF EXAMINATION

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

Page

DIRECT EXAMINATION 5

Questions by Andrew M. McNeil

CROSS-EXAMINATION 33

Questions by William J. Beggs

DIRECT EXAMINATION 34

Questions by Andrew M. McNeil

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 EXHIBITS

Deposition Exhibit No.:	Page
Exhibit 50 - Typewritten notes beginning with "Schools lose \$50,000"	15
Exhibit 51 - LowTaxInfo document for 3144 South Cuffers Drive (BLOOMINGTON_199094 - 199096)	18

Previously Marked Exhibits:	Page
Exhibit 28 - Amended and Supplemented Answers of County Residents Against Annexation, Inc. to City of Bloomington's Interrogatories	26

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.

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?

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

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.

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?

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

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

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

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

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

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.

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

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

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?

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

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

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.

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 district?

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

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

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

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 --

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

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

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

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

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

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.

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.

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

1 significantly smaller home for the price, when
2 I'm considering the mortgage and the taxes and
3 the insurance and everything else that comes
4 with owning a home.

5 MR. BEGGS: No further questions. Thank
6 you.

7 DIRECT EXAMINATION,

8 QUESTIONS BY ANDREW M. McNEIL:

9 Q Just for the record, I heard your answer the way
10 you just described it. Maybe you said it
11 differently at a different time, but I certainly
12 heard you say what you just said.

13 A Okay. Thank you.

14 MR. McNEIL: I have no further questions on
15 those questions.

16 MR. BEGGS: You're finished.

17 THE WITNESS: I was going to say one more
18 thing.

19 BY MR. McNEIL:

20 Q Is there anything else you would like to say
21 about the annexation before we're off the
22 record?

23 A Yes. Thank you for the final opportunity.

24 I just, really thinking about what I do for
25 my school and the community, I'm really about

1 doing the right thing. And I don't feel like
2 involuntary annexation is the right thing for
3 the people in our community. I know that there
4 are people that live in, say, for example, the
5 doughnut or some people call it the island
6 within the city, that some of them do want the
7 city services because they have failing septic
8 and need to hook up to city utilities, and that
9 is something that they would like to do, and
10 they should be able to voluntarily join those
11 residents.

12 But I think for other people within the
13 community who don't want to be part of the city,
14 that we should not be forced to join.

15 And I think it's -- when I think about
16 things that are the right thing to do, if I
17 truly thought this was the right thing to do,
18 then I wouldn't be here today with the County
19 Residents Against Annexation. Maybe my
20 signature would have been on that paper, maybe
21 not. I probably wouldn't have signed if I
22 didn't think this was -- you know, if opposing
23 annex wasn't the right thing to do, I would not
24 have signed that paper.

25 And so I just strongly feel that, for the

1 people of our community, we should not be
2 involuntarily annexed. And if the City wants to
3 do so, they should do so through voluntary
4 annexation.

5 (Time noted: 11:04 a.m.)

6 AND FURTHER THE DEPONENT SAITH NOT.
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10 _____
11 MEGAN PARMENTER
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1 STATE OF INDIANA)
) SS:
2 COUNTY OF HAMILTON)

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

9 That the foregoing deposition was taken on
10 behalf of the Respondents, at the offices of
11 Bloomington City Hall, 401 North Morton Street,
12 Bloomington, Monroe County, Indiana, on the 1st day
13 of March 2024, commencing at the hour of
14 10:24 a.m., pursuant to the Indiana Rules of Trial
15 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 her 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



Janine A. Ferren

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

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

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Veritext Legal Solutions

1100 Superior Ave

Suite 1820

Cleveland, Ohio 44114

Phone: 216-523-1313

March 15, 2024

To: William J. Beggs, Esq.

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

Veritext Reference Number: 6465811

Witness: Megan Parmenter Deposition Date: 3/1/2024

Dear Sir/Madam:

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

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

Sincerely,

Production Department

NO NOTARY REQUIRED IN CA

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

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

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Megan Parmenter

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 Megan Parmenter

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

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

I have affixed my name and official seal

this _____ day of _____, 20_____.

Notary Public

Commission Expiration Date

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DEPOSITION REVIEW
CERTIFICATION OF WITNESS

ASSIGNMENT REFERENCE NO: 6465811

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

DATE OF DEPOSITION: 3/1/2024

WITNESS' NAME: Megan Parmenter

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 Megan Parmenter

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

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

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

Notary Public

Commission Expiration Date

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0	2020 24:3	4 27:10	872 14:21
000509 1:4	2021 9:25	401 1:19 37:11	16:13
095 18:18	15:24 16:22	44114 39:2	876 15:2
1	20:18	450 17:20,22,23	9
1,740.28. 18:25	2023 17:7	46204 2:11	900 17:8,14,15
105 11:1	18:21,24 19:17	47403 6:24	17:16,18,18
10:24 5:1 37:14	23:12 26:14	47404 2:4	19:9
10:30 1:20	2024 1:19	5	a
10:56 31:13	37:13 38:6,13	5 3:3	a.m. 1:20 5:1
10:58 31:14	39:4	50 4:3 13:6	31:13,14 36:5
1100 39:1	211 2:4	15:20	37:14
111 2:10	21167 38:9	50,000 4:3	able 35:10
11:04 36:5	216-523-1313	10:14 20:10	above 39:11
12 7:3 9:2,9	39:3	21:22	absolutely 10:5
14:9 19:11	22 38:13	51 4:4 18:2,3,5	15:14 20:6
14,000 11:3	24 26:14	20:2	26:3
14:7	26 4:10	53c06-2203 1:4	accomplish
15 4:3 39:4	27 15:24	6	39:16
15th 38:5	2700 2:10	6465811 39:8	accordance
16 8:23	28 4:10 26:19	40:2 41:2	40:5 41:5
18 4:4	3	6th 29:4	account 8:10
1820 39:2	3 27:4	7	8:13 19:11
199094 4:5	3/1/2024 39:9	70 13:7	acknowledge
199096 4:5	40:3 41:3 42:2	700 19:17	40:11 41:16
1b 6:25 7:1,17	30 6:5	8	act 40:14 41:20
1st 1:19 37:12	30,000 29:11	8,000 29:15	action 37:25
2	3144 4:4 6:23	812.332.9295	38:2
2 27:4	18:13	2:5	actually 13:8
20 40:16 41:22	317.684.5000	84 11:2	13:14 29:3
42:22	2:11	84-4852 1:17	30:1
2012 7:4	33 3:4		add 31:9

addition 8:2 17:15 additional 14:22 21:6,8 address 6:22 16:15 18:14 advantage 13:21 advertised 32:15 advisor 8:21 affixed 38:5 40:15 41:21 afford 7:25 8:1 14:13 29:19,20 affordability 8:3 affordable 14:16 aforemention... 37:8,23 agenda 22:2 agendas 21:16 ago 23:23 29:14 agree 30:14,14 ahead 30:21 al 1:7,11 39:6,7 40:3,3 41:3,3 amcneil 2:12 amended 4:10 27:1 amount 14:25 16:16 21:2	analysis 16:18 andrew 2:8 3:3 3:6 5:8,11 34:8 annex 14:6 35:23 annexation 1:6 4:11 5:13 6:13 6:25 7:13 9:23 10:4,11 11:12 27:15,17,24 28:1,8 30:4,7 30:13 31:1 34:21 35:2,19 36:4 39:6 40:3 41:3 annexed 17:13 22:21 29:1 30:2 32:11 36:2 answer 5:19 7:19 10:7 34:9 answering 28:20 33:7 answers 4:10 27:1,2 anticipated 27:7 anybody 7:5 anytime 13:8 22:8 appear 40:11 41:15 appearances 2:1	appellants 1:8 2:2 appended 41:11,18 april 38:13 area 6:25 7:17 28:16 areas 32:11 argument 13:12 arrangements 39:15 article 23:12 asked 11:10 27:14 30:1 asking 32:19 assembly 9:4 assessed 20:1 20:25 22:14 assignment 40:2 41:2 42:2 association 11:10 16:7 31:19 32:4 attached 41:7 attorney 11:7 11:13 38:1 attorneys 5:12 38:3 august 15:24 18:1 authorities 21:3 authorize 41:11	automatically 17:24 19:10 auxiliary 25:11 ava's 32:6 available 21:2 21:10 39:13 ave 39:1 avenue 2:4 aware 22:12,15 23:25
b			
back 10:7 28:17 29:3,6 31:6,11,16 based 16:22 20:1,12,13 23:5 24:14 30:6,10 basis 22:4 beggs 2:3 3:5 15:18 31:4 33:5 34:5,16 39:5 beginning 4:3 behalf 1:18 11:11 37:10 belief 30:6,10 believe 10:25 13:22 25:23 28:25 29:4 30:22 benefit 13:12 14:21 benefits 32:10			

<p>big 13:23 14:7 bill 19:24 bills 20:4 bloomington 1:10,18,19 2:4 4:5 5:12 6:23 7:22 8:24 10:24 23:10 24:1 25:12 32:11 37:11,12 39:6 40:3 41:3 bloomington's 4:11 board 11:10 16:7 21:16 22:1 bose 2:9 boselaw.com 2:12,12 bottom 18:16 18:20 27:11 bought 7:3 32:2 boys 25:11 break 6:7 31:2 brentwood 11:11 broad 10:6 budget 10:16 budgeting 30:20 bunger 2:3 buy 15:8</p>	<p style="text-align: center;">c</p> <p>c 2:9 ca 39:25 calendar 23:21 call 27:6 35:5 39:14 called 27:13 camera 28:18 cap 20:13 21:4 capital 11:8 car 12:21 carole 11:8 16:5 carole's 16:10 case 39:6 40:3 41:3 cause 1:4 37:25 certainly 14:23 34:11 certificate 41:11 certification 40:1 41:1 certified 28:9 39:16 certify 37:5,24 chaired 13:9 change 41:8 42:3 changes 40:7 41:7,9 cheaper 33:9 checked 12:15 circle 2:10</p>	<p>circuit 1:3 circulation 29:10 city 1:10,18 4:11 5:12 7:16 7:18,23,25 9:18,21 11:1,6 11:13,14,17 12:3,10 13:1,1 13:5,8,15 14:15,25 16:15 16:19 20:14,21 21:11 23:6,25 24:16,21 25:6 25:13,25 26:2 27:15,24 32:8 32:15,18 33:8 33:18,22,25 35:6,7,8,13 36:2 37:11 39:6 40:3 41:3 city's 20:20 civil 40:5 41:5 civilians 24:22 24:25 25:4 clarifying 33:15 class 8:20 9:1 classrooms 21:21 clear 19:20 clements 2:15 31:5 cleveland 39:2</p>	<p>clipboard 28:17 closing 29:3 clubs 25:11,12 collect 20:16 collected 28:14 collecting 17:4 collection 32:13 college 2:4 come 9:9,12 16:14 22:10 28:22 31:5 comes 16:16 31:10 34:3 comfortable 28:20 commence 1:20 commencing 37:13 commendable 24:23 comment 29:11 commission 38:12,14 40:19 41:25 42:25 commissioned 24:1 common 1:10 39:6 40:3 41:3 communicati... 30:8 community 8:16 10:13 14:4,12 15:9</p>
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<p>22:11 26:17 34:25 35:3,13 36:1 company 17:6 20:3 31:24 completed 39:13 completely 5:19 concern 14:1 concerned 7:17 10:22 concerning 11:19 condo 7:4 confined 14:11 14:14 consequence 20:19 consideration 7:24 considered 7:15 considering 34:2 construction 32:14 consulting 24:10,11 contact 29:2 convenient 30:24 39:15 conversation 15:23 16:5,12</p>	<p>conversations 30:4,12 copied 16:2,7 16:10 copy 15:19 corner 18:8,17 corporation 1:7 8:17,23 10:13 20:9 22:3 corporations 22:13 correct 17:19 corrections 41:17 correctly 33:10 costly 29:19 council 1:10 23:6 24:16 39:6 40:3 41:3 counsel 37:23 county 1:2,3,6 1:10,17,19 4:10 8:2,16 9:21 10:13 11:21 12:5,6,9 12:12 13:6,14 13:15,20 14:15 18:10 20:15 21:1,7,8 25:14 26:6,7,9,11,25 32:22,23 33:9 33:19,20,21,21 33:24 35:18 37:2,4,12</p>	<p>38:14 39:6,6 40:3,3,10 41:3 41:3,15 course 26:14,15 court 1:3 40:7 cover 9:2 21:22 covered 11:3 12:13,16 covers 13:22 covid 19:8 cross 3:4 33:4 crr 1:17 csr 1:17 cuffers 4:5 6:23 18:13 curbside 32:13 current 17:14 currently 8:7,9 17:20 31:19 32:23,24 cuts 10:17</p>	<p>37:12 38:6 40:16 41:22 42:22 days 39:18 deadline 29:8 deal 12:20 dear 39:10 deed 40:14 41:20 deemed 39:20 definitely 19:17 department 10:23,24 22:17 22:19 23:4,10 24:2,22 25:20 25:21 39:23 department's 21:22 deponent 36:6 37:6,20,20 deposition 1:14 1:16 4:2 5:14 6:11 15:15,20 18:3 26:19 37:9,16 39:9 39:11 40:1,3 41:1,3 described 34:10 desks 21:21,23 details 10:8 24:4 difference 16:17 21:24 25:24</p>
		d	
		<p>daily 23:7,11 damaged 11:17 damon 11:8 16:5 dangerous 24:25 date 15:22 16:25 29:3 39:9 40:3,9,19 41:3,13,25 42:20,25 day 1:19 9:3,13 16:12 29:11,15</p>	

<p>different 26:17 30:19 32:19 34:11 differently 34:11 direct 3:3,6 5:7 22:14 34:7 direction 37:18 directly 14:24 24:10,17 29:12 disinterested 37:24 district 10:14 23:1 districts 21:1 divided 19:11 document 4:4 16:1 26:21 doing 35:1 door 28:14,14 28:16,20,21,23 double 17:10 17:11,14 doughnut 35:5 drawing 32:8 drive 4:5 6:23 9:21 12:4,5,6,8 18:13 drove 9:18 12:3 due 14:3 duly 5:3 37:6</p>	<p>eight 26:15 either 24:6 ellettsville 25:13 else's 15:10 email 16:10 29:2 emailed 16:6 employ 38:3 employee 10:12 21:13 encounter 25:2 ended 30:5 english 8:19 21:22 enhanced 32:12 entered 41:9 entire 40:5 41:5 environment 21:24 equals 19:2 errata 39:18 41:7,10,18 42:1 escrow 8:10,13 17:6 19:10,23 20:3 especially 13:23 esq 39:5 et 1:7,11 39:6,6 40:3,3 41:3,3 evaluate 24:1</p>	<p>evans 2:9 event 13:9 38:2 events 26:17 everybody 15:10 examination 1:16 3:1,3,4,6 5:7 33:4 34:7 examined 5:5 example 35:4 executed 41:10 execution 40:14 41:19 exhibit 4:2,3,4 4:10 15:20 18:2,3,5 20:2 26:19,21,22 exhibits 4:1,9 expanding 25:13 expensive 33:18 expiration 40:19 41:25 42:25 expires 38:12 expressing 10:3 expressly 39:13</p>	<p>fair 7:19 24:20 fall 9:25,25 13:16 17:19,22 18:22 19:3 26:14 familiar 25:3 family 12:8 far 20:4 farm 26:9,18 fault 17:23 favor 30:1 fee 25:9,20 feel 11:24 28:20 35:1,25 ferren 1:17 37:3 38:10,14 festival 13:10 25:7,9,10,15,19 figure 16:14 22:3 final 34:23 financial 21:14 find 11:11 fine 12:19 13:7 31:5 finished 34:16 fire 10:23 22:17 22:19,25 first 10:12 18:10 26:24 37:6 five 14:9 fluctuate 8:12 follows 5:5</p>
<p>e</p>		<p>f</p>	
<p>earlier 12:3 effect 33:8</p>		<p>facebook 29:18 facility 13:11 25:16 fact 23:9 27:5 failing 35:7</p>	

<p>footage 33:19 forced 30:13 35:14 foregoing 37:9 40:13 41:18 forgotten 12:22 forthcoming 19:22 found 23:11 four 14:7 free 40:14 41:20 front 18:5 26:21 funded 10:21 10:25 11:1 funding 14:1,3 20:14 21:6 further 31:6 34:5,14 36:6 37:24</p>	<p>gotten 21:7,8 grand 10:16 21:20 great 15:7 greene 12:5 gross 16:16 group 24:10,11 guess 32:19</p>	<p>homes 7:14 14:14 28:15 33:17,17,18 honor 8:20 hook 35:8 hosted 26:17 hour 26:14 37:13 house 12:10 huh 6:6</p>	<p>increased 7:18 15:1,6 19:25 20:15 22:4,12 24:21 increases 21:3 incrementally 19:18 index 3:1 4:1 indiana 1:1,6 1:10,18,19,20 6:23 9:4 13:17 13:19 23:7,11 26:4 37:1,4,12 37:14 38:13 39:6 40:3 41:3 indianapolis 2:11 influxes 19:14 information 16:24 20:18,22 21:17 24:16 29:18 informational 20:23 informed 30:23 inside 7:22 installment 19:2 institutions 27:18 28:1 insurance 8:6 34:3 interactions 30:7,10</p>
<p>g</p>	<p>h half 9:3,13 hall 1:19 37:11 hamilton 1:18 37:2,4 38:14 hand 18:8,17 38:5 hate 12:21 hear 6:2 33:10 heard 14:20 28:12 29:12,13 33:6 34:9,12 help 33:14 herald 23:7 29:9 hereunto 38:4 high 8:24 higher 13:3,4 history 18:20 hits 14:7 home 7:24 8:1 9:12,19 22:20 22:21 32:2 33:8,9 34:1,4 homeowners 11:9 16:7 17:1 32:4</p>	<p>i identification 15:21 18:4 26:20 identified 24:7 27:22 identify 27:5 il 1:17 immediately 16:6 impact 27:16 27:25 30:19 important 9:7 10:21 28:11 29:7 including 32:12 income 12:11 14:5,13 33:23 incorporated 41:12 increase 14:6 14:21 16:13 20:1 21:2 22:10,13 30:17</p>	

<p>interested 38:2 interrogatories 4:12 27:2 investigate 11:10 involuntarily 36:2 involuntary 35:2 involve 11:12 island 35:5 issue 23:5 issues 23:16,19</p>	<p>23:7,14 24:21 28:8,25 29:9 31:10,24 32:2 32:22 35:3,22 knowledge 10:14 23:4 24:14 known 23:9</p>	<p>live 7:5 32:24 35:4 lived 7:2,3 14:8 lives 11:21 12:9 llp 2:9 local 29:9,16,21 locally 15:9 location 39:15 long 6:4 7:2 8:22 12:17 longer 21:9 23:23,24 look 18:16 21:16 32:9 looked 7:14 22:6 27:22 28:18 looking 7:21,22 14:14 17:24 21:20 33:23,24 33:25 looks 16:1 lose 4:3 20:10 20:20 losing 10:14 14:1 lot 10:15 12:4 16:24 21:20 33:8 lower 33:20 lowtaxinfo 4:4 18:9</p>	<p style="text-align: center;">m</p> <p>m 2:8 3:3,6 5:8 34:8 madam 39:10 made 40:7 mail 28:9 maintain 31:20 32:24 maintenance 11:24 32:14 make 6:18 10:17 12:16 15:15 29:13 39:15 makes 21:23 managed 11:8 20:2 manager 11:9 15:24 march 1:19 37:13 38:6 39:4 margaret 2:15 marked 4:9 15:20 18:3 26:19 master 13:17 13:19 26:4,10 matter 5:5,13 37:8 39:12 mckinney 2:9 mcneil 2:8 3:3 3:6 5:8,11 18:2 31:2,8,15 33:1 33:7 34:8,14</p>
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<p>j 2:3 3:5 33:5 39:5 janine 1:17 37:3 38:10,14 january 29:4 job 24:24 join 35:10,14 july 7:4 jump 19:17</p>	<p>landowner 27:14 large 37:5 lawbr.com 2:5 lawsuit 27:6 learning 21:24 left 18:8 legal 39:1 42:1 letter 39:19 letters 28:9 letting 12:17 levels 24:2 liability 11:16 life 10:20 limits 7:16,23 7:25 33:18 line 14:19 18:21 22:2 33:12 41:7 42:3 link 31:25 list 17:1 listed 41:7,17 listing 41:7 little 19:14</p>		
<p style="text-align: center;">k</p>			
<p>karst 26:9,18 keep 15:13 kind 14:9 knew 28:12 knocking 28:23 know 5:24 6:2 6:8 12:25 13:5 15:11 16:8 17:5,25 20:5 20:17,19 21:19</p>			

<p>34:19 mean 13:21 22:17 meant 33:11,16 meeting 20:23 22:2 meetings 23:6 24:16 megan 1:14,16 5:2,10 30:14 33:6 36:10 37:5 39:9 40:4 40:9 41:4,13 42:20 mentioned 19:9 20:9 23:3 25:6 26:4 midwest 42:1 mike 11:7,14 15:23 16:5,8 16:12 mind 12:15,17 12:17 31:10 minutes 6:5,15 22:2 missed 28:3 moment 7:8 money 21:2 monroe 1:2,3 1:10,19 8:16 10:13 12:12 18:10 26:7 32:23 37:12 39:6 40:3 41:3</p>	<p>month 21:16 monthly 8:5,12 30:19 months 7:10 19:11 monument 2:10 mortgage 8:5,7 19:10 34:2 morton 1:19 37:11 move 7:7,12 moved 17:2</p> <p style="text-align: center;">n</p> <p>name 5:9,11 16:9 27:10 39:6 40:3,4,15 41:3,4,21 national 8:20 naturalist 13:17,19 26:4 26:10 nature's 31:25 need 6:1,7 10:19 21:21 35:8 needed 28:13 neighborhood 11:5,6,7,11,13 11:21,22 13:25 17:2 28:15 31:17,19 32:18 new 21:21 news 24:6,15 29:16,21</p>	<p>newspaper 29:10 nicer 15:17 nine 8:25 north 1:19 37:11 notarial 38:5 notary 1:17 37:3 38:12 39:25 40:10,18 41:15,23 42:23 note 15:22 noted 5:1 19:25 36:5 notes 4:3 6:18 6:19 12:14 13:22 14:19 23:11 27:23 notice 1:21 noticeable 19:15,18 np0681591 38:14 number 39:8 numbers 18:17 22:6 23:13 41:7</p> <p style="text-align: center;">o</p> <p>obligation 5:19 observed 22:1 24:15 offered 13:20 13:21 office 39:14</p>	<p>officer 23:19 officers 11:2,4 23:8,14 24:17 offices 1:18 37:10 official 40:15 41:21 oh 17:21 ohio 39:2 okay 6:2 9:9 10:12 12:20 17:21 20:8 28:6 31:7 32:21 33:13 34:13 open 28:16 opportunity 12:24 26:16 34:23 oppose 10:10 30:12 opposed 6:12 opposing 9:22 30:7 35:22 opposition 10:4 27:15,24 oral 1:16 organizing 6:20 owen 25:14 own 17:1 owning 34:4</p>
--	--	---	---

p	parties 37:22 party 38:1,3 pass 10:18 14:2 passed 22:11 pasted 16:2 path 32:13 pavilion 25:15 25:18 pay 11:23 12:6 13:3,4,7,7 19:24 20:3 31:19,23 32:4 32:17 paying 11:20 11:25 12:7 13:23 21:11 payment 8:12 17:18,25 19:23 payments 17:6 19:2,12 people 14:7 17:3 24:24 28:7,10,16,22 28:23 29:1,11 29:15,15,24 30:8,11,25,25 35:3,4,5,12 36:1 perry 22:24,25 person 7:25 29:25 30:18 37:25 person's 14:13 personal 6:19 30:10	personally 28:19 40:11 41:15 petition 9:22 9:24 10:2 petitioners 1:8 2:2 phone 16:5,11 39:3 pick 28:10 pl 1:4 place 1:21 places 7:15,15 plan 14:9 27:5 plans 7:7 please 5:9 6:2,8 10:10 27:4 39:14 point 12:3,25 14:17 points 12:16 13:23 30:16 police 10:24 23:3,8,10,14,18 24:2,17,22 possibly 7:11 posted 14:25 21:17 pre 19:8 prefer 39:16 prepare 6:10 6:16 prepared 12:14 present 2:14 22:5,7	presented 37:20 pretty 5:17 previously 4:9 26:19 price 8:4,5 15:10 34:1 private 11:23 11:23,24 32:1 32:3 privately 32:17 probably 19:7 29:14 35:21 procedure 1:20 37:15 40:5 41:5 process 5:17 16:4 produced 1:16 production 39:23 profit 1:6 program 13:6 13:19 26:5,10 26:13,16 programs 10:19 13:16 25:20,22 26:11 prompt 29:22 property 8:9 11:9 15:6,7,12 15:24 16:13 17:5,11,13 20:4,13 21:4 33:20
----------	--	--	--

<p>protection 23:1 provide 27:6 provided 27:16 27:25 public 1:17 37:3 38:12 40:10,18 41:15 41:23 42:23 pulled 9:1 purchase 8:4,5 purchased 39:17 pursuant 1:20 37:14</p>	<p>ready 6:10 realize 29:8 really 14:11 34:24,25 realty 11:8 reason 6:8 28:10 41:8 42:3 reasons 6:12 10:10 rec 26:7 recall 23:20 24:4 receipt 39:19 receive 12:1 13:24 25:4 32:10,11,16 received 20:22 24:17 receives 22:4 receiving 20:14 30:16 33:21 recess 31:13 recollection 19:5 record 5:9 12:24 15:16 19:19 31:3,9 31:11 34:9,22 37:19 41:9 recreation 26:7 recycling 32:12 reduced 14:3 reference 39:8 40:2 41:2</p>	<p>referenced 39:11 40:11 41:15 referendums 10:18 14:2,5 22:10 referring 19:7 reflect 15:11 reflects 15:10 refresh 19:5 regardless 32:16 relating 5:4 relative 38:1 remember 16:9 24:4 remonstrance 5:13 9:22 remonstrate 28:13 remonstrators 1:8 2:2 removal 11:23 11:24 31:23 32:5,5 rent 25:15 rephrase 6:1 report 24:9 reporter 29:12 40:7 reporting 29:23 represented 37:22</p>	<p>request 41:9,11 required 25:20 30:3 39:25 resets 17:25 residence 38:14 resident 13:5,6 residents 1:6 4:10 11:3 21:10 27:1 35:11,19 39:6 40:3 41:3 resources 20:23,24 respondents 1:12,18 2:7 37:10 responsible 11:18 resulting 22:13 retired 29:12 30:18 returned 39:18 revenue 21:9 21:14 22:3,12 review 22:1 39:14 40:1 41:1 reviewed 24:9 right 9:6 15:5 17:5 18:9,17 19:16,19 21:12 24:12 31:12 35:1,2,16,17,23 ring 28:18</p>
q			
<p>question 5:23 10:6,6 27:4 32:20 questions 3:3,5 3:6 5:8,18 31:6 33:1,5,7 34:5,8 34:14,15</p>			
r			
<p>ran 16:18 rate 11:20 13:3 13:4 rather 33:22 reached 29:1 read 21:17 23:6 24:15 40:5,6 40:12 41:5,6 41:17 reading 24:5 29:17 39:12,19</p>			

rnr 1:17 road 9:21,21 12:4,9,10 31:20 32:1,3 32:24 roads 9:18 12:4 12:6,7,7 robertson 2:3 role 30:6 rooker 11:7,14 15:23 16:6,8 16:12 roughly 9:25 16:19 route 9:17 rules 1:20 37:14 40:5 41:5	22:3,13 34:25 school's 21:13 schools 4:3 10:21 14:1 20:20 21:6 seal 38:5,12 40:15 41:21 search 33:17 second 18:16 27:11 section 18:20 see 12:18 18:11 18:18,22,25 19:3 21:13 26:25 27:8,10 27:19 30:15 31:6 seem 10:15 29:22 33:12 selling 15:10 send 15:19 24:25 sent 14:25 28:9 september 23:12 septics 35:7 series 5:18 service 22:21 serviced 10:22 22:16 services 12:1,2 13:1,24 14:22 14:23 22:19 27:15,16,24,25 30:16 32:12,16	33:22,22 35:7 set 38:4 several 27:21 27:22 shared 20:18 sheet 41:7,10 41:18 42:1 shortcake 13:10 25:10,14 25:18 show 15:18 side 18:9 20:20 sides 20:18 sidewalk 32:13 sign 9:22 29:25 30:23 signature 35:20 37:21 38:9 39:14 signatures 17:4 28:13,14 29:5 30:3 signed 9:24 10:2 11:16 30:25 31:1 35:21,24 40:13 41:18 significant 21:23 significantly 34:1 signing 39:12 39:19 simple 5:17	sincerely 39:21 single 7:25 14:13 29:25 33:23 sir 39:10 situations 25:1 six 7:9 slightly 8:14 32:19 smaller 34:1 snow 11:23 31:23 32:4 society 8:20 solid 20:16 solutions 39:1 42:1 sophomore 8:19,19 source 21:9 sources 24:6,15 south 2:4 4:5 6:23 8:24 18:13 space 8:2 14:11 specifically 25:5 spin 20:21 spoke 23:18 spoken 23:15 sponsor 8:20 sponsored 25:10 spring 17:18,23 18:22 19:3
s			
s 41:8,8 42:3 saith 36:6 saw 28:18 saying 7:21 9:10 23:15 says 14:20 18:8 18:9 27:4,13 32:9,11 scheduled 1:20 scheme 10:16 21:20 school 8:16,23 8:24 9:14,16 10:13,16,20 14:5 20:9 21:13,16,23			

square 33:19 ss 1:1 37:1 staffing 23:16 23:19 24:2 start 7:20 state 1:1,18 5:9 37:1,4 38:13 40:10 41:15 statement 29:13 40:13,14 41:19,19 statements 21:14 stay 14:11 15:9 stenographic... 37:17 stephen 2:9 steve 31:4 sticker 26:22 stood 20:9 strawberry 13:9 25:6,9,10 25:14,18 street 1:19 11:23 32:13 37:11 streets 11:15,17 strongly 30:22 35:25 student 23:7,12 students 10:19 21:25 study 23:25 submitted 29:5	subscribe 29:21 subscribed 40:10 41:14 42:21 successful 10:20 suggesting 19:20 suite 2:10 39:2 summary 16:11 24:20 27:7 sunger 2:12 superior 39:1 supplemented 4:10 27:1 supportive 14:4 sure 10:9 12:16 14:18 15:17 16:23 32:19 surrounding 28:15 switchyard 25:15 sworn 1:16 5:3 37:6 40:10,13 41:14,18 42:21	39:11 talk 31:3,4 talked 27:21 28:2 talking 8:3,4 tax 11:20 14:5 15:12 16:13,18 17:5 18:20,22 18:24 19:6 20:4,13 21:4 taxed 12:11 taxes 7:18 8:2,6 8:9 11:25 13:24 14:20 15:1 17:11,13 19:25 20:15 30:17 33:20 34:2 taxing 21:1,3 22:14 teach 8:19 tell 5:3 10:10 37:6 terms 21:12 testified 5:5 25:23 testify 27:6,14 testimony 5:14 27:7 37:19 40:6,7 41:6,9 41:12 text 16:10 thank 12:21 28:6 33:3,15 34:5,13,23	thereof 1:21 thing 34:18 35:1,2,16,17,23 things 14:10 27:21,22 33:11 35:16 think 12:12,25 14:19 17:8,10 23:9 24:24 28:7,24 29:24 29:24 31:8 33:6 35:12,15 35:15,22 thinking 10:16 34:24 third 18:21 thirty 39:18 thought 6:12 7:9 28:11 35:17 thoughts 6:20 three 22:8 25:12 thursdays 26:15 time 1:21 5:1 7:17 10:15 15:4 16:18 20:4,24 23:18 28:3 34:11 36:5 times 19:8 23:7 29:9 title 26:24,25
	t		
	take 6:7 9:3,4 9:17 11:14,15 12:8,9,10 31:2 32:8,18 taken 1:18 31:13 37:9,16		

<p>today 6:11 30:4 35:18 told 11:13 took 6:19 9:2,7 top 18:8 22:2 total 18:22,24 21:12 town 12:9 townhouse 11:5 14:8 township 10:23 22:17,19,23,24 22:25 training 25:3 transcribed 37:17 40:7 transcript 37:18 39:11,16 40:5,12 41:5 41:11,17 trash 11:15,24 32:5,6,12 travel 9:17 trial 1:20 37:14 true 37:19 truly 35:17 truth 5:3,4,4 37:7,7,8 truthfully 5:20 trying 15:8 32:8 tune 29:16 turn 26:24 27:4 27:10</p>	<p>turns 7:13 two 14:2,3,5 22:8,10 25:12 29:14 typed 15:17 16:15 typeface 16:1 typewritten 4:3 37:18</p> <p style="text-align: center;">u</p> <p>uh 6:6 unarmed 25:1 unaware 28:8 under 37:17 understaffed 10:25 23:10 understaffing 23:3 understand 5:20,23 10:3 19:23 20:25 25:24 28:22 32:1 33:14 understanding 17:22 20:12,17 21:5 22:22 23:2,5 unger 2:9 unprepared 25:1 update 8:13 upper 18:8 use 13:7,10,13 13:14 31:22</p>	<p>used 13:8 29:10 29:17 user 25:25 26:2 using 25:17 utilities 35:8</p> <p style="text-align: center;">v</p> <p>v 39:6 40:3 41:3 validity 30:15 value 20:1 22:14 values 15:6 21:1 veritext 39:1,8 42:1 versus 27:15,25 voluntarily 35:10 voluntary 36:3 volunteer 26:16 vs 1:9</p> <p style="text-align: center;">w</p> <p>waived 39:13 39:20 waiver 11:16 want 12:23,24 13:2 19:19 24:24 30:14 31:16 35:6,13 wanted 9:8 16:9 28:25 31:9</p>	<p>wanting 14:6 wants 32:18 36:2 watched 23:6 way 29:2 30:23 32:20 34:9 we've 13:10 14:2 27:22 28:3 website 16:15 16:19 32:9 week 12:5 29:6 29:22 went 28:14 whereof 38:4 widely 23:9 william 2:3 3:5 33:5 39:5 willing 13:4 window 28:19 witness 1:16 27:5 31:7,12 33:3 34:17 38:4 39:9 40:1 40:4,11 41:1,4 41:15 wjbeegs 2:5 words 33:7 work 8:15,16 9:2,3,7,19 12:11 20:14 30:21 worked 8:22,23 9:13</p>
--	--	--	---

working 12:12 24:22 30:21
works 20:21
worth 15:8
write 6:18
written 1:20
y
yeah 6:19
year 7:10,11 8:12,13 14:9 17:17 19:9 21:15 23:21
yearly 22:4 30:20
years 7:3 8:24 8:25 14:3,9 15:7 22:8 29:14 30:21
yesterday 16:20
z
zillow 7:14,22

Indiana Rules of Trial Procedure
Depositions Upon Oral Examination

Rule 30

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

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

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

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

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

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

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

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

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