

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

THOMAS D'ANGELO,

Plaintiff,

-vs-

No. 2010-000944-NO

Hon. Matthew S. Switalski

PAUL PARENT, CLINTON TOWNSHIP,  
a municipal entity, NICHOLAS DYKAS,  
JASON FIGURSKI and KEITH WATSON,  
in their official and individual capacities,  
jointly and severally,

Defendants.



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

THOMAS D'ANGELO,

Plaintiff,

Case No. 10-12195

-vs-

Hon. Lawrence P. Zatkoff

CLINTON, TOWNSHIP OF, et al,

Hon. Mona K. Majzoub

Defendants.

The Deposition of JANINE TAYLOR,

taken in the above-entitled cause before Denise Moorfoot,  
(CSR-2275), Court Reporter and Notary Public for the County  
of Oakland, State of Michigan, at Clinton-Macomb Public Library,  
40900 Romeo Plank Road, Clinton Township, Michigan, on Tuesday,  
January 25, 2011, commencing at or about the hour of 2:15 p.m.

CONDENSED

Page 6

1 concerning this April 12th, 2008, incident?  
 2 A No.  
 3 Q Do you recall this incident back on April 12th of 2008?  
 4 A Yes.  
 5 Q Okay. And what first brought your attention to the  
 6 situation?  
 7 A I was on desk. That means I was at the reference desk.  
 8 Q Can I just ask this follow-up? Where was the reference desk  
 9 at that time?  
 10 A It's in the middle of the adult nonfiction area. It's  
 11 outside of the computer lab, probably about maybe twenty  
 12 feet.  
 13 Q Okay. And what happened while you were at that desk?  
 14 A Mr. Parent came up to me stating that the person that was  
 15 sitting next to him was rubbing himself and making noises,  
 16 and this had been going on for forty-five minutes and that he  
 17 was fed up with it, and would I please call the police.  
 18 Q Okay. And let me ask this: Did you know Mr. Parent prior to  
 19 that, him coming up to you?  
 20 A Not personally, no.  
 21 Q Had you seen him in the library?  
 22 A Yes.  
 23 Q All right. And what happened next after Mr. Parent informed  
 24 you of that?  
 25 A I said that I could not call the police because I had not

Page 7

1 witnessed the gentleman he was referring to doing anything,  
 2 and then that's when I went to -- I found out who the manager  
 3 in charge for that day was, which was Deb Bodner, who was Deb  
 4 Bodner, and I went to her and explained the situation.  
 5 Q Okay. And when you went to her to explain the situation, did  
 6 you basically relay the information that Mr. Parent had just  
 7 relayed to you?  
 8 A Yes.  
 9 Q Where was Deb Bodner at the time?  
 10 A In her office.  
 11 Q Okay. And that was up on the second floor, also?  
 12 A Yes.  
 13 Q What happened once you informed Deb Bodner of that  
 14 information?  
 15 A She said, "Okay. I'll be out in a couple minutes." I went  
 16 back to the desk, and Mr. Parent continued to complain, and I  
 17 said, "Well, just a moment. I talked to the manager, and she  
 18 will be out in a moment."  
 19 Q And so what happened next?  
 20 A We have the capability of sending messages to the computers,  
 21 and it was my understanding our policy was to try -- I mean,  
 22 I hadn't seen anything. I was just trying to stop whatever  
 23 was going on.  
 24 Q Okay.  
 25 A And so I sent a message to computer number 24, which is where

Page 8

1 the gentleman was, and I said, "There's been a complaint.  
 2 Please stop whatever you might be doing."  
 3 Q Okay.  
 4 A And when Deb came out, I told her what I had done. She said,  
 5 "Okay." She goes, "I'm going to go in there and take a  
 6 look." So she walked by, but I don't recall her going into  
 7 the computer lab. And then she walked over to the desk where  
 8 Mr. Parent was, myself, and by this time another librarian  
 9 had come out. We were all standing there, and he -- you  
 10 know, Deb was trying to, you know, calm him down. She said,  
 11 "I didn't see him doing anything," and Mr. Parent insisted  
 12 that he was and that we call the police. And we said, "Well,  
 13 we really can't do that. That's up to you," because Deb  
 14 said, "I didn't see anything." And she looked at me, and I  
 15 said, "I didn't see anything." And based on the fact that  
 16 neither one of us had seen anything, that it was not our  
 17 responsibility to call the police, at which point he became  
 18 very irate and said, "No. It is your responsibility." So  
 19 Deb said, "Okay, Janine. Just call the police."  
 20 Q You mentioned there was another librarian there?  
 21 A Yes.  
 22 Q Do you recall who that was?  
 23 A Ellen McNally.  
 24 Q And what was Ellen's position at the library at that time if  
 25 you recall?

Page 9

1 A She's an adult nonfiction librarian.  
 2 Q But she wasn't working at the same area that you were, the  
 3 same desk area?  
 4 A I think she was coming out to give me a break. I'm not sure  
 5 exactly why she was at the desk, but as Paul became more  
 6 irate, she just kept telling him to settle down. You know,  
 7 we will take care of it, you know. She was interacting more  
 8 with him, I think, than even Deb, just trying to calm him  
 9 down, because he was very upset.  
 10 Q Okay. And were you present when Deb Bodner called the  
 11 police?  
 12 A I called the police.  
 13 Q Oh, you called the police? And do you recall what you told  
 14 the police at that point?  
 15 A I said, "We have a customer here who claims that there is a  
 16 gentleman playing with himself or whatever in our computer  
 17 lab, and he would like you to come out here so he can file a  
 18 complaint," something to that nature. I don't know exactly  
 19 what I said, but it was to that nature. She informed me that  
 20 she was sending the police, and she asked me if he was still  
 21 there. I said, "Yes." I said, "He seems like he's not going  
 22 anywhere." And she said, "If he tries to leave, will you  
 23 please call back?" And I said, "Okay."  
 24 Q Okay. And so what happened next? Did Mr. Parent stay with  
 25 you?

1 A No. Ellen, because he kept going on, Ellen said, "Since  
 2 you're going to file the complaint and you want the police  
 3 here, I will escort you downstairs to the front doors where  
 4 you will stay until the police come, because this is your  
 5 complaint, not ours."  
 6 Q And so is that what Ellen did, escort him down?  
 7 A Yes, to my knowledge.  
 8 Q They left your area --  
 9 A Yes.  
 10 Q -- which was up there on the second floor; is that a fair  
 11 statement?  
 12 A Yes.  
 13 Q So what was the next contact that you had with anyone related  
 14 to this incident?  
 15 A Probably about ten, fifteen minutes later three police  
 16 officers came up the stairs. I don't know who they asked,  
 17 you know, where the gentleman was that was supposedly doing  
 18 something, and we told him he was on computer number 24, and  
 19 they went in there.  
 20 Q Okay. Did you have any discussion with the officers when  
 21 they came to the library?  
 22 A When they were leaving, yes.  
 23 Q Okay. What do you recall of your discussion with them at  
 24 that time?  
 25 A He asked me -- Honestly, I don't remember. I think he just

1 A No, not to me. I did not see them.  
 2 Q Did you have any further contact with Mr. Parent?  
 3 A He's here all --  
 4 Q Oh, you see him on a regular basis?  
 5 A Yes.  
 6 Q He's a regular patron here?  
 7 A Yes.  
 8 Q Okay. Have you had any discussion with him about this  
 9 incident after the date of the incident?  
 10 A No.  
 11 Q Now, prior to this incident, had you had any contact with Mr.  
 12 D'Angelo?  
 13 A No.  
 14 Q Have you had any contact with him since this incident?  
 15 A No. Honestly, I could have. I don't even remember what he  
 16 looks like.  
 17 Q Okay. Do you know if you generated a report or an e-mail to  
 18 Larry Neal or anyone in the library concerning this incident?  
 19 A Yes.  
 20 Q What do you recall about the report or e-mail that you  
 21 generated?  
 22 A Oh, God, it was so long ago, I can't remember. I think  
 23 pretty much what I told you, that Paul Parent had been in and  
 24 had a complaint about a customer that he was sitting next to  
 25 and demanded that we call the police.

1 asked me if I had seen anything. Yeah. Other than that, I  
 2 don't remember to be honest with you. I know he talked to us  
 3 for a couple minutes before he left.  
 4 Q Okay.  
 5 A Oh, he asked if we had records of what he had been looking  
 6 at.  
 7 Q Okay. And what did you respond?  
 8 A I said to my knowledge, no; that our system was set up for  
 9 privacy, and that once he turns the computer off, there's no  
 10 way of knowing, that it's wiped from the network. That was  
 11 my understanding.  
 12 Q Okay. And when he asked if you had seen anything, what did  
 13 you tell him?  
 14 A No.  
 15 Q Now, when the three officers came up, did Mr. Parent come up  
 16 with them?  
 17 A Yes.  
 18 Q Do you recall anything else that Mr. Parent said concerning  
 19 this incident?  
 20 A No.  
 21 Q Anything else that the police said concerning this incident?  
 22 A No.  
 23 Q Did you have any discussion with the police after they had  
 24 left? Did they call back to the library, or did they make a  
 25 subsequent visit?

1 Q Okay. And did you have any further discussions within the  
 2 library after the time of this arrest concerning what  
 3 happened?  
 4 A Not really.  
 5 Q Other than you, Ellen, and Deb, do you recall any other  
 6 library employees who were present up there on the second  
 7 floor with Mr. Parent or Mr. D'Angelo?  
 8 A No.  
 9 MR. KUHN: I don't have any further questions.  
 10 MR. PEACOCK: I have no questions for you. Thank  
 11 you, ma'am.  
 12 MR. KUHN: Thank you very much.  
 13 (Deposition concluded at 2:30 p.m.)  
 14 ---  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25