

EXHIBIT 26

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

KAREN DAVIDSON, *
DEBBIE FLITMAN, *
EUGENE PERRY, *
SYLVIA WEBER, and *
AMERICAN CIVIL LIBERTIES *
UNION OF RHODE ISLAND *
*

VS. *

C.A. NO.:
1:14-cv-00091-L-LDA

CITY OF CRANSTON, *
RHODE ISLAND *

DEPOSITION OF CHIEF WILLIAM M. McKENNA, a
Witness in the above-entitled cause, taken on
behalf of the Defendants, pursuant to notice,
before Sally Brassard, CSR, a Notary Public in and
for the State of Rhode Island and Providence
Plantations, at the Rhode Island American Civil
Liberties Union, 128 Dorrance Street, Suite 220,
Providence, Rhode Island, on February 23, 2015,
scheduled at 3:00 p.m.

Chief William M. McKenna - February 23, 2015

19

1 Q. And how many of those 14,200 would you estimate
2 were outside of the City lines?

3 A. Last year was approximately 180.

4 Q. So, a little bit more than 14,000, then, would
5 have been calls within the City of Cranston you
6 respond to, and that's for the year 2014?

7 A. Correct.

8 Q. Thank you. And does the CFD ever respond to calls
9 originated from the ACI?

10 A. Yes.

11 Q. And about how many times a year on average would
12 you estimate the CFD is called to the ACI?

13 A. In responses from 2008 to 2014, it was just
14 over thirteen-hundred runs, 1,300 runs.

15 Q. Over that entire period?

16 A. Over that entire period, correct.

17 Q. So that would be --

18 A. 260-something, I believe. Excuse me, it's
19 seven years.

20 Q. Seven years, yes. So, approximately 250 or so
21 calls per year?

22 A. Correct.

23 Q. Okay. Turn your attention to this document here.

24 MR. LIOZ: I'd like to mark this, please.

25 (PLAINTIFFS' EXHIBIT 2 MARKED FOR I.D.)

1 MR. PELLEGRINO: Objection.

2 A. Fire marshal.

3 Q. Is there one fire marshal for Cranston?

4 MR. PELLEGRINO: Objection.

5 A. Yes.

6 Q. And what is the name of that person?

7 MR. PELLEGRINO: I'm going to object, and
8 we can talk -- if you want to talk about it, but I
9 don't want to put it on the record if that's okay.

10 MS. WRIGHT: Are you instructing --

11 MR. PELLEGRINO: Yeah, I instruct him not
12 to respond, and we can discuss who the fire
13 marshal is, but I'd rather it not be on the
14 record.

15 MR. LIOZ: Who the fire marshal is?

16 MR. PELLEGRINO: All right. Go ahead.

17 A. Steven McIntosh.

18 Q. Okay. Is the Cranston Fire Department divided
19 into units based on geography at all?

20 A. Clarify that for me, if you could.

21 Q. Sure. Does the Cranston Fire Department divide
22 the City geographically with respect to which
23 personnel have responsibility for which parts of
24 the City?

25 MR. PELLEGRINO: Objection. You can

1 answer.

2 A. There are fire districts within the City set
3 up by a master plan, and those locations are set
4 up to cover areas of response.

5 Q. Within the City of Cranston?

6 A. Within the City of Cranston and within a
7 certain amount of time.

8 Q. How many fire districts are there?

9 A. There are six fire stations.

10 Q. Is each fire station responsible for covering one
11 district?

12 A. Correct. They have a primary district,
13 correct.

14 Q. And how have these fire -- when were these fire
15 districts created?

16 A. From 1926 through 1984. They've been at
17 different times as the community grew.

18 Q. So the fire districts were originally created in
19 1926, and they've updated at various times through
20 1984?

21 A. Added. The stations have been added. There
22 has been no change in the districts through those
23 times.

24 Q. So the fire -- the six fire districts that were
25 established in 1984, are those the same fire

1 districts that exist now?

2 A. That was -- the last fire station added was in
3 1984.

4 Q. And has the geographical area that each fire
5 station is primarily responsible for changed at
6 all since 1984?

7 A. Since 1984, no.

8 Q. Okay. Do these fire districts have any relation
9 to the City's six wards?

10 A. No.

11 Q. Is the -- earlier, you said the budget of the fire
12 department is approximately 29 million; is that
13 correct?

14 A. Yeah.

15 Q. And how does the City -- how does the fire
16 department receive those budgeted funds?

17 A. Taxes.

18 Q. Taxes. Is there a special tax for fire services,
19 or is it from the general fund of the City?

20 A. General fund.

21 Q. And is the funding of the fire department divided
22 by City ward at all? In other words, do residents
23 of a certain ward fund the fire services in that
24 ward?

25 A. No.