

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
WESTERN DIVISION

KALI MYERS,  
an individual, )  
Plaintiff, )  
vs. )  
THE CITY OF SIOUX CITY, )  
IOWA; ROBERT PADMORE, in )  
his official capacity; )  
and CINDY RARRAT, in her )  
official capacity, )  
Defendants. )

Case No. 5:16-cv-04107-LRR

DEPOSITION OF  
BRENDA IWEN

DATE: Wednesday, January 24, 2018  
LOCATION: Sioux City City Hall  
Legal Division, Suite 511  
405 Douglas Street  
Sioux City, Iowa  
(712) 279-6318  
TIME COMMENCED: 11:42 a.m.  
TIME CONCLUDED: 12:18 p.m.

A P P E A R A N C E S

For the Plaintiff:

MR. KAMRON T.M. HASAN, ESQ.  
Husch Blackwell LLP  
13330 California Street, Suite 200  
Omaha, NE 68154  
(402) 964-5000 Fax (402) 964-5050  
E-mail: kamron.hasan@huschblackwell.com

For the Defendants:

MS. NICOLE M. DuBOIS, ESQ.  
City Attorney  
MR. CALEB CHRISTOPHERSON, ESQ.  
Assistant City Attorney  
405 Sixth Street, Suite 511  
P.O. Box 447  
Sioux City, IA 51102  
(712) 279-6318 Fax (712) 224-5203  
E-mail: ndubois@sioux-city.org  
E-mail: cchristopherson@sioux-city.org



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WITNESS:  
BRENDA IWEN  
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S T I P U L A T I O N S

It is stipulated and agreed by and between the parties hereto:

1. That the deposition of BRENDA IWEN may be taken before Julie A. Pell, Registered Professional Reporter, Certified Realtime Reporter, Certified Shorthand Reporter, Certified Realtime Captioner, General Notary Public, at the time and place set forth on the title page hereof.
2. That the deposition is taken pursuant to notice.
3. That the original deposition will be delivered to Mr. Kamron Hasan, attorney for the Plaintiff.
4. That all objections except as to form and foundation are reserved until time of trial.
5. That the required elements of Federal Rules of Civil Procedure Rule 30(b)(5)(A) and (C) will be set forth within this transcript and, therefore, do not need to be stated aloud on the record by the court reporter.
6. That the testimony of the witness may be transcribed outside the presence of the witness.
7. That the signature of the witness to the transcribed copy of the deposition is not waived.

1 BRENDA IWEN,  
 2 Of lawful age, being first duly  
 3 cautioned and solemnly sworn as  
 4 hereinafter certified, was examined  
 5 and testified as follows:  
 6 (Witness' response to oath - "I do.")  
 7 DIRECT EXAMINATION  
 8 BY MR. HASAN:  
 9 Q. Will you please state and spell your name  
 10 for the record?  
 11 **A. Brenda Iwen. B-r-e-n-d-a, I-w-e-n.**  
 12 Q. Is it okay if I call you Brenda during this?  
 13 **A. Yes.**  
 14 Q. My name is Kamron Hasan. I am one of the  
 15 attorneys for the plaintiffs in this lawsuit.  
 16 **A. Okay.**  
 17 Q. Please call me Kamron.  
 18 **A. Okay.**  
 19 Q. Have you ever had your deposition taken?  
 20 **A. No –**  
 21 Q. I will tell you a little bit about the  
 22 process to kind of get you familiar. It's  
 23 essentially an interview, a question-and-answer  
 24 session where I will be asking you questions and you  
 25 will be providing me answers. The purpose of the  
 deposition is to prepare the parties for trial –

1 **A. Okay.**  
 2 Q. – which is scheduled at some point.  
 3 **A. Uh-huh.**  
 4 Q. Essentially to develop the facts.  
 5 **A. Uh-huh.**  
 6 Q. To figure out the facts of the case. Do you  
 7 understand that?  
 8 **A. Uh-huh.**  
 9 Q. I will jump ahead. One of the important  
 10 things about depositions, if you hear Julie over here  
 11 typing on her machine, this is all being taken down,  
 12 so everything we say is being recorded. And because  
 13 of that, it's important that we try our best to give  
 14 audible answers, yeses, nos –  
 15 **A. Uh-huh.**  
 16 Q. – not uh-huh or huh-uhs because it's hard  
 17 for her to take that down. I will do my best to  
 18 identify – if you do say uh-huh or huh-uh, I will  
 19 ask you is that a yes, is that a no. Will you do  
 20 your best to –  
 21 **A. Yes.**  
 22 Q. – give yeses and nos?  
 23 **A. Yes.**  
 24 Q. Thank you. You understand that you're under  
 25 oath today?

1 **A. Yes.**  
 2 Q. Will you answer truthfully and fully today?  
 3 **A. Yes.**  
 4 Q. Because Julie's taking this all down, it's  
 5 also important that we try our best not to speak over  
 6 each other, which I know it is tough in conversations  
 7 not to interrupt each other, but it's important we  
 8 try our best because she can't take down what...  
 9 **A. Correct.**  
 10 Q. You understand that?  
 11 **A. Uh-huh.**  
 12 Q. Okay. I probably will ask you bad  
 13 questions. And when I say "bad questions," what I  
 14 mean are questions that maybe you don't fully  
 15 understand or maybe you're a little confused. I will  
 16 try my best not to have that happen, but if you don't  
 17 understand my question or you're confused, please let  
 18 me know.  
 19 **A. Okay.**  
 20 Q. And I will do my best to reword it for you  
 21 if I can. Is that fair?  
 22 **A. Yes.**  
 23 Q. Okay. If you need a break during this – I  
 24 hope it won't go too long. Based on the way things  
 25 are going so far, it shouldn't be too long, but if

1 you need a break for anything –  
 2 **A. Okay.**  
 3 Q. – please let me know.  
 4 **A. Okay.**  
 5 Q. I may ask – finish my line of questioning  
 6 to get to a good stopping point, but you're entitled  
 7 to a break. If you need one, just let me know.  
 8 **A. Okay.**  
 9 Q. The attorneys seated to your left may lodge  
 10 objections to some of my questions, may be for any  
 11 number of reasons; however, unless they instruct you  
 12 not to answer the question, you're still under an  
 13 obligation to answer the question that I have posed.  
 14 Do you understand that?  
 15 **A. Okay.**  
 16 Q. Anything about your physical or emotional or  
 17 mental condition that's going to keep you from  
 18 understanding my questions?  
 19 **A. No.**  
 20 Q. How about anything about those conditions  
 21 that it's going to keep you from giving truthful  
 22 answers?  
 23 **A. No.**  
 24 Q. On any medication or alcohol that would –  
 25 **A. No.**

1 Q. -- either that would keep you from answering  
2 truthfully or understanding my questions?  
3 **A. No.**  
4 Q. Brenda, what do you do for a living?  
5 **A. I am a waitress.**  
6 Q. Where?  
7 **A. At Buffalo Wild Wings.**  
8 Q. Oh, you're the Brenda that Kali Myers  
9 mentioned.  
10 **A. Oh, probably.**  
11 Q. Yeah.  
12 **A. Yeah.**  
13 Q. She said Brenda over at Buffalo Wild Wings  
14 was real nice.  
15 **A. Yeah. Yeah. I do that, you know, just**  
16 **enough, but my main gig is Noah's Hope Animal Rescue.**  
17 **I run a local rescue.**  
18 Q. Okay. I have heard of Noah's Hope. That's  
19 great. Well, let's -- probably going to take care of  
20 the Buffalo Wild Wings first just to get that out of  
21 the way. How long have you been there?  
22 **A. Probably about eight years.**  
23 Q. Okay.  
24 **A. Uh-huh.**  
25 Q. That's -- you said it's part time?

1 **A. Uh-huh.**  
2 Q. That's a yes?  
3 **A. Yes. Yes.**  
4 Q. It's going to be tough to avoid those  
5 throughout this.  
6 **A. Yes.**  
7 Q. Okay. It's tough. All right. Tell me  
8 about Noah's Hope. How long have you run Noah's  
9 Hope?  
10 **A. I am the cofounder of Noah's Hope Animal**  
11 **Rescue. I started the rescue ten years ago.**  
12 **Basically what it -- what we do is rescue the -- what**  
13 **somebody people consider the non-adoptable. And**  
14 **that's -- you know, that's how I am, you know,**  
15 **involved with the pit bulls. That's probably why I**  
16 **am here.**  
17 Q. Probably. Yeah. You're here -- we'll get  
18 into the specifics, but you're here because the city,  
19 in their answers to some of the written questions we  
20 provided, listed you as someone who's part of the pit  
21 bull team, essentially.  
22 **A. Right.**  
23 Q. Okay. We'll get into Noah's Hope and kind  
24 of the ins and outs of Noah's Hope in just a minute.  
25 **A. Uh-huh.**

1 Q. But will you tell me a little bit about your  
2 education history, please?  
3 **A. Just a high school graduate, beauty school.**  
4 **You know, no college education.**  
5 Q. Okay. Beauty school, though?  
6 **A. Yeah.**  
7 Q. That's cool. Any certifications, anything  
8 like that related to animals?  
9 **A. No. No. It's -- I have a lot of**  
10 **self-taught knowledge, I feel, but no training, you**  
11 **know.**  
12 Q. You said "self-taught knowledge"?  
13 **A. Yeah. Just by, you know, working with**  
14 **animals for so many years, and I feel I have a**  
15 **know- -- a lot of knowledge but nothing book.**  
16 Q. Okay. Specifically with your experience  
17 with animals, have you ever attended seminars or  
18 conferences?  
19 **A. No.**  
20 Q. How about dog shows?  
21 **A. No.**  
22 Q. How about any formal trainings, like the  
23 National Animal Control Association?  
24 **A. No.**  
25 Q. Any other formal trainings?

1 **A. No.**  
2 Q. Ever reviewed any formal training manuals  
3 or --  
4 **A. No.**  
5 Q. -- any other written materials --  
6 **A. No.**  
7 Q. -- for training?  
8 **A. Nope.**  
9 Q. Any -- aside from you're self-taught, any  
10 other training related to identifying dogs?  
11 **A. No.**  
12 Q. Or identifying dog breeds?  
13 **A. Nope.**  
14 Q. Are you familiar with the American Kennel  
15 Club breed standards for dogs?  
16 **A. No.**  
17 Q. How about the United Kennel Club breed  
18 standards?  
19 **A. No.**  
20 Q. So is it fair to say you've never reviewed  
21 those standards for...  
22 **A. That's correct.**  
23 Q. That is correct?  
24 **A. Uh-huh.**  
25 Q. For any dogs?

1 **A. No.**

2 Q. So specifically for the dogs that are  
3 subject to this lawsuit you've never read the breed  
4 standards?

5 **A. No.**

6 Q. So you mentioned self-taught. I want to  
7 come to Noah's Hope after my more broad question I am  
8 about to ask you. Leading up to Noah's Hope, what is  
9 your history with dogs?

10 **A. Define that. I...**

11 Q. Yeah. So tell me how have you interacted  
12 with dogs – actually, I will take a step back and I  
13 will say the reason I am asking you this question, to  
14 give you an idea of what kind of information I want  
15 you to let me know of is I want to know what it is  
16 about your experience that gives you the foundation  
17 to say that's a – this type of breed.

18 So essentially what I am asking you, leading  
19 up to Noah's Hope, I want to know about your  
20 experience with dogs in such a way that would give  
21 you the ability to say, I self-taught myself on how  
22 to identify the breed of the dog. Does that make  
23 sense?

24 **A. Uh-huh. Yes.**

25 Q. Do you kind of understand what I am...

1 **A. Yes. Yes.**

2 Q. Okay. So leading up to your opening of  
3 Noah's Hope ten years ago, what was your experience  
4 with dogs?

5 **A. You mean identifying dogs?**

6 Q. Yeah.

7 **A. Oh, I have no – it – no – you know, I  
8 really don't identify dogs as far as, you know,  
9 German Shepherd, Rottweiler, pit bull, poodle.  
10 Basically what I do is work with the underdogs. I  
11 basically just – for instance, I am – at our local  
12 animal control I am always given a list.**

13 You know, every, you know, week or two I am  
14 given a list by them and I – oh, ones that are –  
15 they feel are non-adoptable. They possibly have been  
16 deemed vicious or they're a pit bull, black lab,  
17 senior, hit by a car, parvo, mange, ones that they –  
18 instead of euthanizing, they make a list and give it  
19 to me.

20 And that's basically – I don't really work  
21 with specific breeds. So anything that comes into my  
22 rescue or the list that's given to me they're all put  
23 through a – what I feel, a temperament test and  
24 then – or, you know, evaluated, oh, for medical  
25 reasons or whatever.

1 **But I don't really – I am not really  
2 involved in labeling a pit bull or, you know, breeds  
3 mean nothing to me. If it – if a dog has been  
4 deemed vicious by our city or if it's been labeled as  
5 a pit bull, those are the only two different – I  
6 would handle those dogs different than what else  
7 comes into, that's on my list.**

8 **Anything that has been deemed vicious or is  
9 a pit bull, I have to get it outside of the city. I  
10 have to foster it outside of the city. That's the  
11 only – that's the only difference between a poodle  
12 and a pit bull or, you know, whatever. That's the  
13 only difference is deemed vicious, pit bull, has to  
14 be outside the city.**

15 **But as far as labeling, I – you know, I  
16 don't. It's already been labeled when it comes to  
17 me.**

18 Q. Okay. I will kind of – you mentioned a lot  
19 there. So we'll kind of –

20 **A. Okay.**

21 Q. – go on individual parts. First of all,  
22 did you say underdog?

23 **A. That's – yeah, that's what I call them is  
24 the underdogs. You know, anything that – you know,  
25 like if you were to go into a shelter and you**

1 **wouldn't stop by the kennel and say, oh, I want that  
2 dog.**

3 Q. Oh, okay.

4 **A. Uh-huh.**

5 Q. I understand. Yeah. I didn't know if that  
6 was just like a colloquial thing or if that was a  
7 specific term of art.

8 **A. That's what I call them. Yeah.**

9 Q. Okay. So I want to make sure I understood  
10 you correctly. The way that you come into possession  
11 of dogs is the city will give you a list first?

12 **A. Uh-huh.**

13 Q. Is that right?

14 **A. Uh-huh.**

15 Q. That's a yes?

16 **A. Yes. Yes.**

17 Q. Okay. So the city provides you a list of  
18 the dogs that they have deemed non-adoptable?

19 **A. Yeah. They feel like they've been sitting  
20 there for a while or they're old or they need  
21 medical. Like yesterday I got a hit by car. You  
22 know, ones that come with high medical bills or –  
23 you know, or if it's been, say, signed out of the  
24 city, you know, and then it comes back in and then  
25 signed out of the – you know, it come – I am saying**

1 **a pit bull.**  
 2 Q. Uh-huh.  
 3 **A. If it – you know, then they'll give those**  
 4 **to me if it's been in the city twice. It – you**  
 5 **know, so that's basically what I work with.**  
 6 Q. Okay. So – but it's a list that's given to  
 7 you?  
 8 **A. Yes. Correct.**  
 9 Q. And the way you described how they identify  
 10 the dogs, ultimately it's their selection of dogs  
 11 that come to you?  
 12 **A. Yes. Yep.**  
 13 Q. Once they give you that list, did you say  
 14 that you run them through temperament and medical  
 15 tests?  
 16 **A. I run them through temperament tests, and**  
 17 **then I assess them just myself. I assess them, you**  
 18 **know, do they need medical. Like a – the poodle**  
 19 **that I brought in yesterday clearly had a broken leg.**  
 20 **It had been hit by a car.**  
 21 **So, you know, if it needs medical, I get it**  
 22 **up to the hospital right away. It – you know, if**  
 23 **something is kind of iffy on if it's aggressive or**  
 24 **not, they get a more thorough temperament test. In**  
 25 **order for me to work them, they have to be people and**

1 **dog friendly. I mean, I am not going to put**  
 2 **something out there that's vicious, you know.**  
 3 Q. Sure. I understand. For – I think you  
 4 said iffy with aggression. When is that  
 5 determination made? Is it when the city gives them  
 6 to you or after you take them in?  
 7 **A. Say that again.**  
 8 Q. Yeah. So you said that when you're doing  
 9 the temperament test that if a dog is iffy with  
 10 aggression that you'll, you know, be more thorough in  
 11 checking to see whether that...  
 12 **A. Right. Right. Like if I – you know, once**  
 13 **I get the list and if a dog is – when I take it out,**  
 14 **you know, if it's, you know, attacking dogs as we're**  
 15 **walking through the shelter, you know, that's a –**  
 16 **you know, something that I am going to pay attention**  
 17 **to. If it's grabbing ahold of me as we're – that's**  
 18 **something I am going to pay attention to.**  
 19 **You know, if they don't show any signs of**  
 20 **that, you know, then I feel pretty comfortable. Then**  
 21 **I will put them with another dog or, you know, and**  
 22 **then I move them on into a foster home once I feel**  
 23 **comfortable with them.**  
 24 Q. Okay. So then I guess my question  
 25 specifically is that the determination of, quote,

1 iffy with aggression, that's your determination or  
 2 that's the city's determination?  
 3 **A. I get dogs that – it's the city's**  
 4 **determination. If it's – if it's been deemed**  
 5 **vicious, the city – you know, if there's no owner**  
 6 **that's fighting for it, nobody's stepping up for this**  
 7 **dog, they're not going to the – you know, because if**  
 8 **a dog is deemed vicious, the family has the right to**  
 9 **take city – challenge animal control. And if**  
 10 **there's nobody that's fighting for that dog, you**  
 11 **know, the ani- – the family is like, well, I don't**  
 12 **like the dog anyways, then that's when I step in.**  
 13 Q. Okay.  
 14 **A. And then there's – I feel like there's**  
 15 **multiple reasons why a dog might have been deemed**  
 16 **vicious, you know, hit by a car, you know, puppies.**  
 17 **There's – you know, it's scared.**  
 18 Q. So the city will tell you whether or not  
 19 they believe a dog has aggression issues?  
 20 **A. Yes.**  
 21 Q. Before it comes to you, the city will tell  
 22 you whether or not they believe a dog has aggression  
 23 issues?  
 24 **A. Yes.**  
 25 Q. And then after that you do your temperament

1 tests?  
 2 **A. Yes.**  
 3 Q. So after they provide you the list and tell  
 4 you whether or not it – they believe they have  
 5 aggression issues and after you run your temperament  
 6 test, is it at that point that you ultimately take in  
 7 the rescue or...  
 8 **A. Yes.**  
 9 Q. Any other steps that I missed?  
 10 **A. No.**  
 11 Q. What's your role with – I mentioned that  
 12 the city identified you as someone who helps out,  
 13 like, as the pit bull enforcement team. What's your  
 14 role in handling pit bulls with the city? What's  
 15 your role with the city in handling dogs that are  
 16 deemed pit bulls?  
 17 **A. As I stated, they – anything – if a – if**  
 18 **a pit bull – backing up, you know, a lot of these**  
 19 **pit bulls are picked up as strays. They're turned**  
 20 **over by owners. You know, a lot of these – a lot of**  
 21 **these pit bulls don't even have, you know, anybody**  
 22 **that wants them.**  
 23 **And so what my role is, any time a pit bull**  
 24 **comes in the – it's turned over to me, and then I**  
 25 **work on getting it outside of – you know, into a**

1 **foster home outside of the city limits.**  
 2 Q. So your role is to take possession of them  
 3 after the determination has been made?  
 4 **A. If there's nobody that is fighting for that**  
 5 **dog. If the – if the pit bull has an owner, then I**  
 6 **am not involved in it. If the pit bull has an owner,**  
 7 **you know, that – that they're tak – you know,**  
 8 **they're, whatever, going to the – I don't even know**  
 9 **how they do it. I guess they would take it to court**  
 10 **maybe. I don't know.**  
 11 **But anyways, however they do it, once a –**  
 12 **you know, if a dog is taken from the owner as a pit**  
 13 **bull, then the owner has the right to get it outside**  
 14 **of the city, not bring it back into the city.**  
 15 **The second time it's brought into the city,**  
 16 **then they don't have – they're not able to get the**  
 17 **dog back.**  
 18 Q. Okay. So you're...  
 19 **A. And then that's when I take over.**  
 20 Q. So your role is to take dogs that the city  
 21 has deemed to be a prohibited pit bull and the owner  
 22 is not in the picture?  
 23 **A. Yes. Yep.**  
 24 Q. Okay.  
 25 **A. Once all of the legal stuff is taken care of**

1 **instead of, you know, instead of euthanizing the dog,**  
 2 **I am given the opportunity.**  
 3 Q. Okay.  
 4 **A. So I am – I am not involved in it at all**  
 5 **until everything – every – you know, the owners are**  
 6 **out of the picture, everything is done.**  
 7 Q. So you come into the picture at the end?  
 8 **A. Uh-huh.**  
 9 Q. That's...  
 10 **A. Yeah. It's either, like I said, you know,**  
 11 **the dog can either – you know, I try to prevent, you**  
 12 **know, not only pit bulls, but all of the dogs that**  
 13 **come into animal control, I try to prevent anything**  
 14 **from being euthanized.**  
 15 **And I do it, you know, Sioux Falls Humane**  
 16 **Soc – I mean, I do it all. I work with the FBI at**  
 17 **reservations. And, you know – and so I try to keep**  
 18 **all the dogs from anything – from being euthanized,**  
 19 **you know, if I feel like it's a good dog.**  
 20 Q. Sure.  
 21 **A. You know, or if my vet – if my veterinarian**  
 22 **says, you know, it's too injured to save, which**  
 23 **happens every now and then, I will let it go, or if**  
 24 **it seems to be a danger to put back into the**  
 25 **community, I will let it go, but...**

1 Q. How many dogs do you have?  
 2 **A. We usually have about 70 in our system.**  
 3 Q. Wow.  
 4 **A. But – and we're strictly foster based. We**  
 5 **don't have a shelter. So it makes it a little bit**  
 6 **more difficult.**  
 7 Q. You run foster dogs?  
 8 **A. Uh-huh.**  
 9 Q. So there are foster dog parents out there?  
 10 **A. Yeah. Yep. Yep. We have just – we have a**  
 11 **ton of people in our community that are involved.**  
 12 **And thank goodness for that.**  
 13 Q. Yeah. One of my coworkers does this. He  
 14 fosters two to three dogs at any given time.  
 15 **A. Yeah. And it's...**  
 16 Q. So it's people like that that...  
 17 **A. Yeah.**  
 18 Q. Okay.  
 19 **A. And it's nice because then you can – you**  
 20 **know, if you do have any questions about maybe, you**  
 21 **know, this or that about the dog, it goes into a**  
 22 **foster home before it's ever put – adopted out, you**  
 23 **know, put back into the community.**  
 24 **So if it – you know, if it's food**  
 25 **aggressive, you can work on that. If something, you**

1 **know, it comes to my house, it's food aggressive, I**  
 2 **will teach it you can't do that, you know, or dog**  
 3 **aggressive, I will teach it you can't because I want**  
 4 **to send out, you know, a bomb-proof dog when I adopt**  
 5 **them out.**  
 6 Q. So the ultimate goal is adoption?  
 7 **A. Uh-huh. Absolutely.**  
 8 Q. Going back to – and this lawsuit is about  
 9 the pit bull ban.  
 10 **A. Right. Uh-huh.**  
 11 Q. So I want to focus on that. Do you have any  
 12 role whatsoever in determining whether or not a dog  
 13 meets the definition of pit bull under the code?  
 14 **A. Huh-uh. Nope.**  
 15 Q. Have you ever been asked to give your  
 16 opinion as to whether a dog meets the definition  
 17 under the...  
 18 **A. No. Huh-uh. It's always labeled before I**  
 19 **get it.**  
 20 Q. Do you ever – actually, strike that.  
 21 For the dogs that are in your facility, do  
 22 you...  
 23 MS. DuBOIS: Objection as to form. Maybe  
 24 if – I don't know...  
 25 Q. (By Mr. Hasan) Sure. Sure. How about the

1 dogs that are a part of Noah's Hope, do you place  
2 labels on them as far as this is a type of breed of  
3 dog?

4 **A. If it's been labeled as a pit bull, I make  
5 sure that I foster it outside the city and adopt it  
6 outside of the city because I don't – you know, I  
7 don't ever want to have it back in the city if it's  
8 been – you know, otherwise, I wouldn't be able to –  
9 you know, I wouldn't be able to...**

10 Q. Yeah. I mean more along the lines for the  
11 70 dogs that are – about 70 dogs that are  
12 continually a part of Noah's Hope.

13 **A. Uh-huh.**

14 Q. Are each of those identified with a  
15 predominant breed?

16 **A. Yeah. I mean, yeah. Like if – yeah, if I  
17 feel like it's a, you know, mostly poodle or – yeah.  
18 Uh-huh.**

19 Q. So for every one of those?

20 **A. I have – I guess, yeah.**

21 Q. Sure.

22 **A. I kind of – I guess. And I – you know,  
23 and a lot of times when I put them on Facebook people  
24 are saying, well, that's not – because I've never –  
25 you know, I don't...**

1 Q. Okay. You say you guess at the breed?

2 **A. At the breed, yes.**

3 Q. For every one of them you guess at what the  
4 breed is?

5 **A. Yeah. I kind of, you know...**

6 Q. How is it that you make that guess?

7 **A. Just by working with so many dogs for so  
8 many years.**

9 Q. Is it visually is how you...

10 **A. Uh-huh. Visually. Yes.**

11 Q. What is it that you take into consideration  
12 when you make that guess? Like, what parts of the  
13 dog do you consider?

14 **A. Just their – just their facial features,  
15 their size, their hair.**

16 Q. Ultimately, what is it about the dog that  
17 leads you to the predominant breed, though? Is it a  
18 certain feature in? Is it a collection of features?  
19 Is it...

20 **A. It would be a collection of features.**

21 Q. What features?

22 **A. Hair, facial features, size, weight, build.**

23 Q. In your experience are differences in those  
24 features indicative of – actually, strike that.

25 The dogs that come to you that have been

1 deemed by the city as pit bulls, do you ever make the  
2 determination that it is, in your guess, a different  
3 predominant breed of dog?

4 **A. I really don't question it because it's –  
5 you know, once it's given to me, I don't – I don't  
6 question it because that's not my job.**

7 Q. So if you – if you take the dog and the  
8 city has already deemed it a pit bull, it's a –  
9 you're not going to change it to a different breed?

10 **A. I wouldn't. No. Huh-uh.**

11 Q. And, obviously, I understand you can't have  
12 it come back into the city.

13 **A. Uh-huh.**

14 Q. Is that the reason why you wouldn't change  
15 the breed determination?

16 **A. Uh-huh.**

17 Q. To make sure it doesn't go in?

18 **A. That would be correct. Yes.**

19 Q. That's the reason why?

20 **A. Yeah. I would never – like if the city's  
21 deemed some – or, says that something is a pit bull,  
22 once I get it I am not going to relabel it and then  
23 have it adopted out and someone thinks it's an  
24 American – or, I label it as an American Bulldog and  
25 then, you know, I adopt it out as that and then the**

1 **people – the family that adopts it, well, it's  
2 labeled American Bulldog, so I can take it to Sioux  
3 City. And then all of a sudden it gets picked up at  
4 large and it's – you know, so, no, I never relabel  
5 it.**

6 Q. I understand that. Are there ever  
7 circumstances where the city has determined or deemed  
8 a dog to be a pit bull and you look at it and you  
9 think, no, that's not? I know you've mentioned  
10 American Bulldog.

11 **A. Uh-huh.**

12 Q. Are there ever circumstances where...

13 **A. I don't question it.**

14 Q. You never question it?

15 **A. Huh-uh.**

16 Q. Do you ever – is the reason you never  
17 question it what you just talked about about avoiding  
18 the risk that it ultimately winds back up in Sioux  
19 City?

20 **A. I just – I just never question it because  
21 I – once it's been labeled it's – you know, and  
22 given to me, that's just what I – what I go with  
23 because I have no knowledge – I have no knowledge on  
24 determining what's pit bull, what's not.**

25 Q. Well, let's talk about that. You have no

1 knowledge on determining what's pit bull, what's not.  
 2 How is that true? How is it that you have no  
 3 knowledge? I mean, how do you know it is a pit bull  
 4 or it's not?  
 5 **A. Well, I know that -- I mean, I know that a**  
 6 **lot -- if it was a purebred American Staffordshire**  
 7 **Terrier, yes. I mean, that's clear. But I don't --**  
 8 **I don't have any knowledge on, you know, is it 51/49.**  
 9 **I have no knowledge on that. You know, no, I**  
 10 **don't -- I don't.**  
 11 Q. There's no way to visually determine whether  
 12 it's 51/49?  
 13 **A. I personally can't because I don't have the**  
 14 **experience.**  
 15 Q. Sure. How about are you also talking about  
 16 maybe like -- 51/49, are you talking about DNA?  
 17 **A. I have never -- oh, I don't think DNA tests**  
 18 **work.**  
 19 Q. Okay. Why?  
 20 **A. Just because I don't -- pit bull is -- I**  
 21 **don't feel like it's a -- I don't think it's**  
 22 **registered on the DNA test.**  
 23 Q. Sure. I think -- actually, let's take a  
 24 look at this. In front of you is the code sections  
 25 for the pit bull ban.

1 **A. Uh-huh. Uh-huh.**  
 2 Q. And specifically under 7.10.010, the  
 3 definition, they list three different purebreds  
 4 there, the American Pit Bull Terrier, American  
 5 Staffordshire Terrier and Staffordshire Bull Terrier.  
 6 Do you see that right there?  
 7 **A. Uh-huh. Yes.**  
 8 Q. So for purebred dogs for DNA tests, assuming  
 9 that that's in a DNA bank --  
 10 **A. Uh-huh. Uh-huh.**  
 11 Q. -- do you still believe the DNA tests don't  
 12 work?  
 13 **A. No. I think the DNA test would work for**  
 14 **American Staffordshire Terrier.**  
 15 Q. Okay.  
 16 **A. Uh-huh.**  
 17 Q. So using that as an example, you mentioned  
 18 earlier that, you know, you're not able to determine  
 19 51 versus 49 for a dog.  
 20 **A. Uh-huh.**  
 21 Q. Are you talking about -- the 51/49, are you  
 22 talking about what the dog's actual DNA is?  
 23 **A. I am talking about what the appearance is.**  
 24 Q. Okay. And how would you -- you're saying  
 25 that based on the appearance, you're not able to say

1 this dog is 51 percent based on its overall  
 2 appearance?  
 3 **A. Right.**  
 4 Q. It's not 51 percent one of these breeds? Is  
 5 that what you're talking about?  
 6 MS. DuBOIS: Objection as to -- objection  
 7 as to form.  
 8 Q. (By Mr. Hasan) Sure. Let me rephrase that  
 9 then. When determining the 51/49 -- let's kind of  
 10 wrap this back up. You said that you're not able to  
 11 do a 51/49 determination?  
 12 **A. I personally can't.**  
 13 Q. Sure. You personally aren't able to do a  
 14 51/49 determination?  
 15 **A. Huh-uh. I don't work with the breed enough**  
 16 **to...**  
 17 Q. So...  
 18 **A. I don't -- I am not -- I don't work with the**  
 19 **breed enough to, you know, be able to -- I**  
 20 **couldn't -- I couldn't do that with any breed, not**  
 21 **just the pit bull.**  
 22 Q. Yeah.  
 23 **A. You know, if it's a -- if it's a Doberman, I**  
 24 **wouldn't be able to -- I always just guess and...**  
 25 Q. Okay. So you're saying that just based on

1 your visually looking at a dog, you're not going to  
 2 be able to make the determination that it's  
 3 51 percent any given breed?  
 4 **A. That's correct.**  
 5 Q. You ever take photographs of the dogs that  
 6 are part of Noah's Hope?  
 7 **A. Uh-huh.**  
 8 Q. Is that how you put them on the website?  
 9 **A. Uh-huh.**  
 10 Q. Is that yes?  
 11 **A. Yes.**  
 12 Q. Do you think photographs are fair  
 13 depictions -- can be fair depictions of a dog when  
 14 identifying a breed?  
 15 **A. No. Huh-uh.**  
 16 Q. Why is that?  
 17 **A. Just it -- it's hard to tell on their**  
 18 **weight, their body frame, their -- you know, like I**  
 19 **said, I -- when I label a poodle or lab or whatever,**  
 20 **I always -- you know, you can kind of tell by the**  
 21 **texture of the hair, the body frame, the weight. So,**  
 22 **no, I don't feel like you can tell by the...**  
 23 Q. You think it has to be in person to be able  
 24 to make a guess on the predominant breed of a dog?  
 25 **A. Uh-huh. Uh-huh.**



1 Q. Yes?  
 2 A. Yes.  
 3 Q. I know. It's really difficult to get away  
 4 from uh-huhs, huh-uhs. It's very difficult. My  
 5 family hates it when I speak to them because I, you  
 6 know, sit there and say, that's a yes?  
 7 A. It's...  
 8 Q. And it's like, it's hard to get out of that.  
 9 And I am the least-liked person in my family probably  
 10 not just for that reason, but that factors into it.  
 11 Who is your contact at the city when you get  
 12 the – any dogs, but specifically pit bulls, provided  
 13 to you? Who's your contact?  
 14 A. Anybody that works at the front desk. You  
 15 know, Chris Wall, Cindy Rarrat, Kenna Anderson.  
 16 Q. Okay. So the animal control people?  
 17 A. Uh-huh. Yeah. Anybody that's there.  
 18 Q. Okay.  
 19 A. I am usually given the list by any of those  
 20 three.  
 21 Q. Do you have any contract or agreement with  
 22 the city to provide these...  
 23 A. No. Everything is volunteer. Nobody gets  
 24 paid, nobody – nothing.  
 25 Q. Just because you're doing the right thing?

1 A. Uh-huh. I would do it with the Humane  
 2 Society if they need – I – like I said, I work with  
 3 the FBI at the Santee, Macy, Winnebago. I work with  
 4 Sioux Falls, and I work with all of the rural, like,  
 5 veterinarians. So I am kind of all over the place.  
 6 Animal control is just one of my – one of my gigs.  
 7 Q. That's good. And in your experience are  
 8 certain breeds more aggressive than others?  
 9 A. Oh, not – Chihuahuas are aggressive. You  
 10 know, there are some there that are – but not in  
 11 particular, no. I feel like, you know, it's – a lot  
 12 of it has to do with the breeding.  
 13 Q. When you say "breeding," you mean the  
 14 ownership histories?  
 15 A. Well, I – yeah. I just mean like inbred.  
 16 You know, there's – there are – I feel like there's  
 17 nasty of all breeds.  
 18 Q. And is that based on how the dog was raised?  
 19 A. Not necessarily.  
 20 Q. Just it could be inherent within the dog?  
 21 A. Uh-huh. Yeah. I have a – I had a pit bull  
 22 that I just rescued from Macy, and he had been  
 23 chained – emaciated, chained to a propane tank  
 24 outside. Nicest, nicest dog.  
 25 My friend has a Golden Retriever she bought

1 from a breeder at six weeks old, you know, nasty.  
 2 And she's taken it through – so I don't feel like  
 3 there's a – I don't feel like there's a specific...  
 4 Q. So no correlation between the breed – no  
 5 steadfast correlation between the breed and the  
 6 behavior?  
 7 A. I don't think so. I personally don't think  
 8 so.  
 9 Q. Do you think that physical characteristics  
 10 are indicative of how a dog is going to behave?  
 11 A. No.  
 12 Q. Did you do anything to prepare for today?  
 13 A. No. I am sorry. Can you tell?  
 14 Q. No. No.  
 15 A. I am sorry. Like I said, I am not educated  
 16 at all.  
 17 Q. I...  
 18 A. I haven't...  
 19 Q. I think you have the impression that I was  
 20 trying to critique you. I am not.  
 21 A. Good.  
 22 Q. I am just asking if you prepared at all.  
 23 A. Yeah. No.  
 24 Q. I promise you I am not criticizing at all.  
 25 A. Yeah.

1 Q. Did you speak with anyone about preparing  
 2 for today?  
 3 A. No.  
 4 Q. Did you speak with anyone about the subject  
 5 matter of this?  
 6 A. No.  
 7 MR. HASAN: Let's take a quick break, okay?  
 8 THE WITNESS: Okay.  
 9 MR. HASAN: Are you guys good with that?  
 10 MS. DuBOIS: Uh-huh.  
 11 (A recess was taken from  
 12 12:13 p.m. to 12:15 p.m.)  
 13 Q. (By Mr. Hasan) Brenda, does anyone at  
 14 animal control or the city ever ask you your opinion  
 15 as to what you think the predominant breed of a dog  
 16 is?  
 17 A. No.  
 18 Q. That's never happened before?  
 19 A. No.  
 20 Q. What would you tell them if you were to get  
 21 asked that question?  
 22 A. Ask me the question again.  
 23 Q. Yeah.  
 24 A. How...  
 25 Q. What if the city or animal control ever

1 asked you your opinion as to a specific dog's...

2 **A. I would tell them that I have no knowledge.**

3 Q. Why?

4 **A. Because I don't want to be involved in the**

5 **whole pit bull ban. I want no part of it because I**

6 **have got such a full plate as it is. All – I mean,**

7 **I will take what they give me and go with that, but**

8 **for me to get involved in all this other stuff, I**

9 **don't have – I can't. I have no time.**

10 Q. Okay. If you had the time would you give

11 that opinion? Like specifically for one dog if they

12 were to ask you, here's Fido. Brenda, what kind

13 of – what do you think the predominant breed of Fido

14 is?

15 **A. No.**

16 Q. You wouldn't do it?

17 **A. No.**

18 MR. HASAN: Okay. That's all I have got.

19 Do you guys have anything?

20 MS. DuBOIS: No questions.

21 THE WITNESS: Okay.

22 MR. HASAN: Brenda, since Julie's taking

23 down everything, she's going to prepare a transcript

24 of the questions and answers.

25 THE WITNESS: Uh-huh. Okay. Okay.

1 if it was -- if you answered correctly or

2 accurately --

3 THE WITNESS: Okay.

4 MS. DuBOIS: -- you would have that ability

5 to look at it later.

6 THE WITNESS: Okay.

7 MS. DuBOIS: Some people waive it. It's

8 completely up to you.

9 THE WITNESS: Okay. I'll go ahead and read

10 through it.

11 MR. HASAN: Okay. Then the address that we

12 have on file for you, once we get it from Julie, I

13 will ask our assistant to send it to you.

14 THE WITNESS: Okay.

15 MR. HASAN: And essentially what that's

16 going to be is you'll get the transcript, and then if

17 you have any corrections, you'll write down what --

18 where the corrections should be --

19 THE WITNESS: Okay.

20 MR. HASAN: -- and then you sign it, and

21 you send it back to Julie, and she will make those.

22 THE WITNESS: Okay. Okay.

23 MR. HASAN: Okay? All right. I don't have

24 anything further.

25 THE WITNESS: Okay.

1 MR. HASAN: Do you take down the uh-huh and

2 huh-uhs?

3 THE COURT REPORTER: Yes, I do.

4 THE WITNESS: Sorry.

5 MR. HASAN: There's going to be a

6 transcript prepared. Under the rules you have a

7 right to review and make any edits or corrections to

8 your testimony that you wish.

9 THE WITNESS: Okay.

10 MR. HASAN: You have the ability to waive

11 that right also. Completely your decision. You can

12 ask the city's attorneys what...

13 THE WITNESS: Okay.

14 MR. HASAN: But it's your decision. If

15 you'd like to review and sign it, we can send you a

16 transcript for you to review, or you can waive that

17 right.

18 THE WITNESS: Okay. And what is -- I don't

19 know what I am supposed to do.

20 MS. DuBOIS: It's really personally up to

21 you, if you feel comfortable in the answers that you

22 have given.

23 THE WITNESS: Uh-huh.

24 MS. DuBOIS: If you question something you

25 may have said and you want to revisit it to determine

1 MR. HASAN: So I hope you have a good rest

2 of the day.

3 (The deposition concluded at 12:18 p.m.)

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<b>1</b>	Affix [1] 42/24 after [6] 13/7 18/6 19/25 20/3 20/5 21/3 again [2] 18/7 36/22 age [1] 5/2 aggression [6] 18/4 18/10 19/1 19/19 19/22 20/5 aggressive [6] 17/23 23/25 24/1 24/3 34/8 34/9 ago [2] 10/11 14/3 agreed [1] 4/2 agreement [1] 33/21 ahead [2] 6/9 39/9 ahold [1] 18/17 al [1] 42/2 alcohol [1] 8/24 along [1] 25/10 aloud [1] 4/20 already [2] 15/16 27/8 also [3] 7/5 29/15 38/11 always [4] 14/12 24/18 31/24 32/20 Amendment [2] 3/5 42/1 American [9] 12/14 27/24 27/24 28/2 28/10 29/6 30/4 30/4 30/14 Anderson [1] 33/15 ani [1] 19/11 animal [10] 9/16 10/10 11/23 14/12 19/9 22/13 33/16 34/6 36/14 36/25 animals [3] 11/8 11/14 11/17 another [1] 18/21 answer [4] 5/22 7/2 8/12 8/13 answered [1] 39/1 answering [1] 9/1 answers [6] 5/24 6/14 8/22 10/19 37/24 38/21 any [24] 8/10 8/24 11/7 11/22 11/25 12/2 12/5 12/9 12/9 12/25 18/19 20/9 20/23 23/14 23/20 24/11 29/8 31/20 32/3 33/12 33/19 33/21 38/7 39/17 anybody [3] 20/21 33/14 33/17 anyone [3] 36/1 36/4 36/13 anything [13] 8/1 8/16 8/20 11/7 14/21 15/8 15/24 20/17 22/13 22/18 35/12 37/19 39/24 anyways [2] 19/12 21/11 appearance [3] 30/23 30/25 31/2 Appearances [1] 3/2 aren't [1] 31/13 art [1] 16/7 aside [1] 12/9 ask [9] 6/19 7/12 8/5 13/8 36/14 36/22 37/12 38/12 39/13 asked [3] 24/15 36/21 37/1 asking [4] 5/23 13/13 13/18 35/22 assess [2] 17/17 17/17 assistant [2] 2/9 39/13 Association [1] 11/23 assuming [1] 30/8 attached [1] 41/15 attacking [1] 18/14 attended [1] 11/17 attention [2] 18/16 18/18 attorney [4] 2/8 2/9 4/13 41/11 attorneys [3] 5/14 8/9 38/12 audible [1] 6/14 avoid [1] 10/4 avoiding [1] 28/17 away [2] 17/22 33/3	backing [1] 20/18 bad [2] 7/12 7/13 ban [3] 24/9 29/25 37/5 bank [1] 30/9 based [6] 7/24 23/4 30/25 31/1 31/25 34/18 basically [5] 10/12 14/10 14/11 14/20 17/5 beauty [2] 11/3 11/5 before [6] 4/5 19/21 23/22 24/18 36/18 42/21 behave [1] 35/10 behavior [1] 35/6 being [5] 5/2 6/11 6/12 22/14 22/18 believe [4] 19/19 19/22 20/4 30/11 best [7] 6/13 6/17 6/20 7/5 7/8 7/16 7/20 between [4] 4/2 15/11 35/4 35/5 bills [1] 16/22 bit [3] 5/20 11/1 23/5 black [1] 14/16 Blackwell [1] 2/3 body [2] 32/18 32/21 bomb [1] 24/4 bomb-proof [1] 24/4 book [1] 11/15 bought [1] 34/25 Box [1] 2/10 break [4] 7/23 8/1 8/7 36/7 breed [24] 12/15 12/17 13/3 13/17 13/22 25/2 25/15 26/1 26/2 26/4 26/17 27/3 27/9 27/15 31/15 31/19 31/20 32/3 32/14 32/24 35/4 35/5 36/15 37/13 breeder [1] 35/1 breeding [2] 34/12 34/13 breeds [6] 12/12 14/21 15/2 31/4 34/8 34/17 BRENDA [14] 1/14 3/8 4/4 5/1 5/10 5/11 9/4 9/8 9/13 36/13 37/12 37/22 41/6 42/3 bring [1] 21/14 broad [1] 13/7 broken [1] 17/19 brought [2] 17/19 21/15 Buffalo [3] 9/7 9/13 9/20 build [1] 26/22 bull [32] 10/21 14/9 14/16 15/2 15/5 15/9 15/12 15/13 17/1 20/13 20/18 20/23 21/5 21/6 21/13 21/21 24/9 24/13 25/4 27/8 27/21 28/8 28/24 29/1 29/3 29/20 29/25 30/4 30/5 31/21 34/21 37/5 Bulldog [3] 27/24 28/2 28/10 bulls [8] 10/15 20/14 20/16 20/19 20/21 22/12 27/1 33/12
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