

Page 1

Volume I
Pages 1 - 41

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
WESTERN DIVISION

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

KALI MYERS, an individual,
Plaintiff,

vs.

CITY OF SIOUX CITY, IOWA;
ROBERT PADMORE, in his official
capacity; and CINDY RARRAT, in
her official capacity,
Defendants.

DEPOSITION of JESSICA HEKMAN
Monday, January 22, 2018
10:06 AM

Held at:

FLYNN REPORTING ASSOCIATES
873 Waverly Street
Framingham, Massachusetts 01702

Court Reporter: Norma Flynn Borelli, CSR, RPR

FLYNN REPORTING ASSOCIATES
Professional Court Reporters
(508) 755-1303 * (888) 244-8858
www.flynnreporting.com

Page 2

1 APPEARANCES:

2

3 FOR THE PLAINTIFF:

4 HUSCH BLACKWELL

5 BY: Gene Summerlin, Esq.

6 13330 California Street, Suite 200

7 Omaha, Nebraska 68154

8 402.964.5014

9 gene.summerlin@huschblackwell.com

10

11 FOR THE DEFENDANT:

12 Justin Vondrak, Esq.

13 Assistant City Attorney

14 405 Sixth Street, Suite 511

15 Sioux City, Iowa 51102

16 712.279.6318

17 jvondrak@sioux-city.org

18

19

20

21

22

23

24

Page 3

1 INDEX

2 Testimony of:

3 JESSICA HEKMAN

4 Examination by Attorney Vondrak 4

5

6 EXHIBITS

7 Number	8 Page	9
10 101	City Charter and Code of Ordinances	4
11 102	Inside Edition Article	4
12 102A	The Washington Post Article	4
13 102B	The Washington Post Article	4
14 102C	The Washington Post Article	4
15 102D	Fox News Report	4
16 103	Tribune Media Wire Article	4
17 104	CBS/AP Article	4
18 105	fox2now.com Article	4
19 106	Wikipedia Article	4

20

21

22

23

24

EXHIBITS PROVIDED TO ATTORNEYS

Page 4

1 PROCEEDINGS

2 (Exhibits Nos. 101 through 106

3 marked for Identification.)

4 JESSICA HEKMAN, having been

5 satisfactorily identified and duly sworn

6 by the Notary Public, was examined

7 and testified as follows:

8 EXAMINATION

9 BY ATTORNEY VONDRAK:

10 Q. Ms. Hekman, may I call you Jessica?

11 **A. You may. Or Dr. Hekman. Preferably not**

12 **Ms. Hekman.**

13 Q. Have you ever had your deposition taken

14 before, Jessica?

15 **A. I have not, no.**

16 Q. I will go through some of the ground rules.

17 First of all, since this is a phone deposition, as

18 true with any deposition, I will need audible

19 answers, yes or no. A head nod or um-hum or

20 anything like that won't work. Does that make

21 sense?

22 **A. That does.**

23 Q. Okay. Currently, are you under any

24 medication or alcohol which would affect your

Page 5

1 ability to answer the questions truthfully?
 2 **A. No.**
 3 Q. Are you under any physical, emotional, or
 4 mental duress that would prohibit you from answering
 5 honestly and truthfully?
 6 **A. No.**
 7 Q. Is there anything that would prevent you
 8 from answering any of these questions today
 9 truthfully?
 10 **A. No.**
 11 Q. My name is Justin Vondrak. I represent the
 12 plaintiff in this matter. I want to learn a little
 13 about your educational background.
 14 (Off the record.)
 15 **A. My educational background?**
 16 Q. Yes. Starting with your undergraduate
 17 studies.
 18 **A. Undergraduate I went to Harvard University**
 19 **and I studied the history and literature of the**
 20 **middle ages.**
 21 **Do you want to ask me about each of these**
 22 **or should I just sort of continue?**
 23 Q. No, I will let you kind of continue. Just
 24 give me a brief overview of your educational

Page 6

1 background.
 2 **A. I graduated magna cum laude. Then I was a**
 3 **computer programmer for 12 years, decided to go back**
 4 **to school. I went to Tufts' Cummings School of**
 5 **Veterinary Medicine where I did a dual degree**
 6 **program. So I got my doctorate of veterinary**
 7 **medicine there and I also got a master's in**
 8 **comparative biomedical sciences. Graduated from**
 9 **that dual program in 2012.**
 10 **I then went to the University of Florida**
 11 **for a year-long internship. An internship sort of**
 12 **straddles the bounds between being educational and**
 13 **being a job, but generally considered educational.**
 14 **That was a specialty internship in shelter medicine.**
 15 **As a part of that internship, I took advanced**
 16 **classes in shelter behavior and forensics and**
 17 **forensic behavior, both of which may be relevant**
 18 **today.**
 19 **After that, I went to do a Ph.D. in animal**
 20 **sciences, specifically genetics, genomics, and**
 21 **bioinformatics, at the University of Illinois at**
 22 **Urbana-Champaign.**
 23 **That program I was interested in studying**
 24 **the genetics of dog behavior. We specifically used**

Page 7

1 **fox model, which I am happy to talk about in more**
 2 **detail there.**
 3 **After graduating that in 2017, I came to**
 4 **the Broad Institute of MIT and Harvard. So now I'm**
 5 **doing a postdoc which, again, just like an**
 6 **internship, really straddles between being**
 7 **educational and being a job. A lot of people will**
 8 **put it under education on their CV because it really**
 9 **is sort of that next step in education. So that's**
 10 **focusing on research for a few years, and that**
 11 **research is, again, focused on the behavioral**
 12 **genetics of dogs.**
 13 Q. I want to back up just a little bit. I
 14 have some questions. Tell me a little bit about
 15 your master of science in comparative biomedical
 16 sciences.
 17 **A. Sure. After my second year of veterinary**
 18 **school, I took 15 months to focus on the master's.**
 19 **The question was whether we would be able to**
 20 **identify -- the goal was to identify, be able to use**
 21 **behaviors that dogs exhibited when they were in the**
 22 **hospital to identify dogs who are particularly**
 23 **stressed, to target those dogs for interventions.**
 24 **The way I did that was by video recording**

Page 8

1 **dogs, dogs coming into that hospital for their first**
 2 **night. So they are away from home and we selected**
 3 **healthy dogs, dogs generally coming in for, like,**
 4 **knee injuries. A lot of dogs injure their cranial**
 5 **cruciate ligament and come in for surgery. They're**
 6 **basically healthy dogs and in the hospital**
 7 **overnight.**
 8 **I would video record them for 20 minutes so**
 9 **that I had a record of their behavior. Then I took**
 10 **a saliva swab, which I analyzed for their cortisol**
 11 **levels. Cortisol is a hormone that, among other**
 12 **things, can be used as a way to estimate an animal's**
 13 **stress level. So I looked for correlations between**
 14 **cortisol levels these animals had and the different**
 15 **behaviors they exhibited.**
 16 **I think that's probably what you need to**
 17 **know, but let me know if you have more questions**
 18 **about that.**
 19 Q. That's okay.
 20 **These dogs you were examining, in 20**
 21 **minutes, was it right after they were put into,**
 22 **we'll call it their holding kennel?**
 23 **A. Their runs? It varied. It was always the**
 24 **first night. I had to do it at the same time of day**

Page 9

1 because of the way that cortisol hormone varies
 2 during the day. So I always did it in the evening.
 3 Some dogs had been there -- I made sure they had had
 4 some time to settle in. Maybe half hour or an hour.
 5 Some dogs had been in there all afternoon and some
 6 dogs had been there much less time.
 7 Q. Was there any correlation between specific
 8 --
 9 A. Behaviors and cortisol levels?
 10 Q. No. Varying timelines. What I would be
 11 wondering is if a dog would calm down after three
 12 hours in the run versus one that had been there for
 13 30 minutes.
 14 A. I didn't find that. I am trying to
 15 remember if I actually looked at timing because I
 16 didn't always necessarily know exactly when they had
 17 been put in. So that was definitely not something
 18 that we reported on in the paper. I may have looked
 19 at it and not reported on it in the paper, but I
 20 don't remember for sure, so I'm going to say I'm not
 21 sure.
 22 Q. Okay. I want to move on to your Ph.D.
 23 What was your thesis? I read a little bit about
 24 that.

Page 10

1 A. Yeah.
 2 Q. Tell me a little bit about what that
 3 entailed.
 4 A. Sure. I was working on studying foxes from
 5 the Russian team fox project, a very well-known
 6 study. It's been covered in the press a lot. It
 7 started in Siberia in Russia in the '60s. They
 8 started breeding foxes to be either very, very tame,
 9 and another line of them to be very aggressive to
 10 humans.
 11 These animals make a really nice model for
 12 studying how just genetics can affect behavior
 13 because both the tame foxes and the aggressive foxes
 14 are maintained in very similar environment.
 15 When you try to go study this in pet dogs,
 16 which is what my actual interest is, there are a lot
 17 of confounding variables. Every dog is raised in a
 18 somewhat different environment by different people
 19 with different life experiences. We minimize that
 20 by looking at these foxes that are in these very
 21 similar environments.
 22 It is also nice to have -- they took these
 23 animals from when they were wild and bred them
 24 basically to be tame or to be sort of more wild or

Page 11

1 more specifically aggressive. If you did that with
 2 pet dogs, you would have all of the selection that
 3 had been going on previously. If you took
 4 laboratory beagles, there is all that selection
 5 already that has happened for coat color and size
 6 and all that. With the foxes they are very
 7 straightforward just looking at the genetics of
 8 these behaviors.
 9 I was at Illinois, obviously, not in
 10 Siberia. I did get to go to Siberia for a week to
 11 meet the foxes. But in Illinois, I had brain
 12 samples from foxes who were very tame and foxes who
 13 were very aggressive.
 14 I was particularly interested in the
 15 regions of the brain that controlled that same
 16 hormone cortisol that I was studying in my master's.
 17 So I looked at these regions and looked at
 18 gene expression differences in the region. I can
 19 talk more about what gene expression, what that is,
 20 if you want, but I just looked to see if there is
 21 differences, if genes are expressed different
 22 amounts in the specific regions in the tame foxes
 23 versus the aggressive foxes.
 24 As an explanation for why, we know the tame

Page 12

1 foxes have much lower cortisol levels and
 2 behaviorally behave as much less stressed. The
 3 aggressive foxes, much higher cortisol levels and
 4 behaviorally behave as if they are much more
 5 stressed. So you're trying to find in the brain, at
 6 the cellular level, what are some of the
 7 explanations for that.
 8 Q. So the aggressive foxes were high in
 9 cortisol?
 10 A. Yes. That was not my research. That
 11 research was done years ago, but that was why I was
 12 interested in them.
 13 Q. What did you find? Let me ask an obvious
 14 question. Why are they doing this to foxes,
 15 aggressive versus tame?
 16 A. There is a bunch of different ways I can
 17 answer that. The answer today is it's a really
 18 long-running program which I think is what you are
 19 getting at. I could talk about why the original
 20 researchers started this in the '60s, but I don't
 21 think that's relevant to your question today.
 22 The reason we're doing it today, I touched
 23 on this a little bit when I said they're really good
 24 models for how genetics affect behavior. Other

Page 13

1 people in the laboratory where I worked were
 2 interested in them as models for humans. Trying to
 3 figure out some humans are born with a genetic
 4 predisposition to be a bit more stressed out or more
 5 easily depressed, more easily become anxious. Other
 6 humans are what we would call robust or resilient.
 7 They can have a large number of traumatic events in
 8 their life and come out unscathed.

9 Some questions that some people hope these
 10 foxes might help us eventually to answer, questions
 11 like why is it when you send soldiers to the
 12 battlefield some come back with PTSD, some do not.
 13 They have had similar experiences. Is it genetics
 14 that affects that? Is it early life experience that
 15 affects that? What is it? How can we understand
 16 what's going on with that?

17 A lot of people, as I said, use the foxes
 18 for those kinds of questions for humans. For me, I
 19 was really interested in the question of for dogs,
 20 why is it -- same question -- some dogs, you know,
 21 you raise them as best you can and you socialize
 22 them great, and yet they still turn out to be
 23 aggressive to people or to other dogs or some such.
 24 Some dogs, you raise them in this terrible

Page 15

1 very binary way of looking at it.

2 When I was actually meeting individuals, I
 3 met some tame foxes that really wanted to interact
 4 with me and some that were scared of me. I met some
 5 aggressive foxes that you go up to the cage and they
 6 are just immediately hitting the front of the cage
 7 trying to get at you and bite you, and some of them
 8 go hide in the back of the cage and are really
 9 scared of you. So there is a lost individual
 10 variation.

11 So I liked the foxes as a model because
 12 they were so clear, as clear as we can get really,
 13 to try to find some differences. I found some
 14 interesting differences at the cellular level and at
 15 the pituitary, which is an organ in the head. The
 16 question is how applicable is that to pet dogs?
 17 That's why I am really happy to be working with dogs
 18 now. I have these interesting hypotheses from
 19 working with the foxes. But question is going to
 20 be, these things that we found in this very
 21 unnatural population that we've maintained for so
 22 many years, are those things actually going to be
 23 applicable to dogs with their many, many more
 24 different selection pressures; not being selected

Page 14

1 environment and they turn out fine. We know
 2 environment has a massive effect, but does genetics
 3 have an effect as well? That's what I was trying to
 4 get at.

5 Q. That is helpful a lot.

6 What is your take on the fox study? Not in
 7 scientific terms, but just in terms of knowing how
 8 genetically aggressiveness can be passed down?

9 A. Yeah. With the foxes, because they have
 10 been really, really intensively selected for exactly
 11 one thing, behavior, since the 1960s, we have this
 12 really nice model in which we know genetics has a
 13 massive effect. We like to say there is no overlap
 14 between the two populations. The most aggressive of
 15 the tame foxes is still more tame than the least
 16 aggressive of the aggressive foxes. Does that make
 17 sense?

18 Q. Yes.

19 A. However, within those two populations,
 20 there is still a lot of variation. That is why it
 21 was really nice for me to get to go to Russia and
 22 meet some of the foxes because in my mind I had been
 23 thinking of them as it's either tame or aggressive,
 24 and there is these two foxes they go. This is a

Page 16

1 solely for behavior, dogs growing up in different
 2 environments. And the foxes are raised in this
 3 incredibly unnatural environment in these little
 4 cages with no human interaction -- with a little bit
 5 of human interaction when they're fed, but no real
 6 socialization. Then dogs have really varied
 7 environments, some good, some bad. How applicable
 8 is this going to be to dogs? That's really an open
 9 question.

10 I hope that answers your question. I found
 11 something in the foxes that I thought was really
 12 interesting. It is a hypothesis-building thing for
 13 me to now move into dogs and see if it still
 14 applies.

15 Q. Okay. That helps me.

16 Have you done any, in any of this, whether
 17 it's your Ph.D. or when you were getting your
 18 master's of science, specifically done any work with
 19 dogs?

20 A. So the master's work was explicitly with
 21 dogs, hospitalized dogs. My Ph.D. work was, as I
 22 said, with foxes, my actual research. I did a lot
 23 of reading about dogs. I participated for pretty
 24 much my entire Ph.D., I organized what we call a dog

Page 17

1 journal club where we would read a scientific paper
 2 about dogs every week. And I'm working with dogs
 3 now.

4 I also was lucky to be sent to work with an
 5 ASPCA in a fighting dog bust case for a week. That
 6 was during my Ph.D. Not related to my research, but
 7 still very educational.

8 Q. Tell me a little bit about that, your
 9 involvement with the fighting dogs.

10 A. Yes. So I knew Pam Reid from the ASPCA.
 11 She is a Ph.D. behaviorist working with the ASPCA.
 12 ASPCA had seized a bunch of different fighting dogs.
 13 It was hundreds of them. I want to say it was
 14 upwards of 500 of them. I think it was at the time,
 15 and perhaps still, the largest seizure of fighting
 16 dogs in this country ever.

17 Q. They all came out of one place?

18 A. No. That's why it was difficult for them
 19 to coordinate it. I think it was either four or
 20 five different yards that they had to go seize
 21 simultaneously so no one would be warned.

22 These dogs were brought down to
 23 Gainesville, Florida, and housed there. One of the
 24 first orders of business for the ASPCA was to

Page 18

1 behaviorally evaluate each of these dogs to
 2 establish whether they were going to be safe to be
 3 placed into homes. They were doing this prior to
 4 actually having the legal ability to dispose of the
 5 dogs one way or another. They wanted to know ahead
 6 of time what their plan for the dog was going to be.

7 I was working with a team of very
 8 experienced people who had done a lot of behavioral
 9 assessments before. I knew a lot about behavioral
 10 assessments. I myself had not worked directly with
 11 fighting dogs before, so I was more in an assistant
 12 role.

13 What we would do is these dogs were all in
 14 this massive kennel in this big warehouse. We had
 15 an area set aside, and multiple teams working
 16 because there were so many dogs, so three teams
 17 working at once. We would go get the next dog,
 18 bring it into the area for the assessment, then
 19 perform this very specific set of interactions with
 20 the dog meant to test how the dog responded to
 21 humans and how the dog responded to other dogs.

22 Q. What were the breeds of the fighting dogs,
 23 the predominant breeds?

24 A. They were all pit bull type. I would

Page 19

1 expect they were all purebred American pit bull
 2 terriers, but I don't know that for sure. There may
 3 have been some other breeds mixed in, but they were
 4 all very type E, very traditional pit type.

5 Q. They looked like your traditional pit
 6 bulls?

7 A. Yeah. I expect knowing what I know about
 8 dog fighters, they generally tend to take purebred
 9 American pit bull terriers and breed those. These
 10 were from fighting lines.

11 Q. Why do they want pit bulls? Why not
 12 rottweilers? Why not other types of dogs? Why are
 13 pit bulls a fan favorite?

14 A. You would have to ask them what their
 15 specific selection goals are. I know from working
 16 with other groups – I am working with guide dog
 17 groups right now and they tend to take labrador
 18 retrievers. You really want to concentrate the
 19 particular fan types or traits that you are
 20 interested in. So it's nice to start with a pure
 21 breed where you already have the variance of the
 22 genes you are interested in and already fairly
 23 concentrated. I don't think there is any reason
 24 they couldn't have started with rottweilers, but

Page 20

1 they may have liked the smaller size of dogs for
 2 speed.

3 You can start with any of those breeds that
 4 you mentioned. Once you have started with the one
 5 breed, you are going to continue with the one breed
 6 probably.

7 Q. Since you have a little bit of knowledge, I
 8 want to ask you about that. What characteristics,
 9 in your opinion, make the pit bull an attractive dog
 10 for dog fighting? What abilities does it
 11 genetically have?

12 A. They're strong. They're smart. They are
 13 high energy. They tend to be quite biddable, so
 14 fairly easy for a human to train. That's important.
 15 There is a lot of training that goes into dog
 16 fighting.

17 They tend to be very easy for humans to
 18 handle, so these dogs I worked with, I felt very
 19 safe around all of them, except one. There was only
 20 one dog, out of the several dozen I interacted with,
 21 that I didn't feel completely comfortable with off
 22 leash. They were very affectionate, very cuddly.
 23 But they do seem to have an elevated risk of
 24 development of aggression towards other dogs.

Page 21

1 You would frequently see these dogs where
 2 you would pull the dog into the training area, you
 3 would be working with the dog, and we would start
 4 getting fond of them, right? They would be very
 5 affectionate, very pleased to interact with us
 6 because they hadn't been before. Then you would go
 7 test it on another dog and it was like their
 8 personalities just changed.

9 That's something you really want with a
 10 fighting dog. They are in the ring with the dog,
 11 right, physically holding the dog often, restraining
 12 the dog before it's time for the dog to be released
 13 to fight with the other dog. You really don't want
 14 that dog turning around and redirecting onto a
 15 human. They have to be good with humans.

16 Q. You said -- let me make sure I have this
 17 right -- you said there were times where you would
 18 have a dog that was a companion or dog you could
 19 really get along with and really liked, and once you
 20 got them into a situation, it was almost like a
 21 switch was turned?

22 A. Yeah. They have been highly trained. It's
 23 something I haven't ever seen in another population
 24 of dog, honestly, besides these. It was kind of

Page 22

1 crazy. And it was in the older dogs. You could
 2 almost predict it with dogs that came in with scars
 3 on their faces, so you knew they had already been in
 4 a fight. They were much, much more likely to behave
 5 this way. The younger dogs, the puppies, not so
 6 much.

7 They would stop interacting with you. So
 8 they would go for this other dog. We were testing
 9 it with a fake dog. My job was to hold this fake
 10 golden retriever-ish type thing, full size. I would
 11 hold it and come in and I would sort of animate it
 12 and have it interacting with the other dog. Some
 13 would go for it immediately. Some with pause and
 14 interact and then decide. Once they went for it,
 15 they would stop interacting with the humans so much.

16 Q. Sure. What do you think -- what
 17 characteristics, in terms of strength or jaw size or
 18 head size, that makes a pit bull an attractive
 19 animal for a dog fighter? Is their bite stronger?
 20 Is their head bigger? Tell me a little bit about
 21 that.

22 A. They have a fairly blocky head and they're
 23 strong. I don't think they -- if you compare them
 24 to any other breed that has a blocky head and is

Page 23

1 strong, I don't think there is anything particularly
 2 special about them. They're muscular dogs. There
 3 are other breeds that are muscular dogs as well.

4 Q. What might some of those other breeds be
 5 that are muscular dogs as well?

6 A. Mastiff, greyhounds are super muscular but
 7 they don't have the blocky head. Got a bunch of
 8 little terriers. Jack Russell terriers are
 9 muscular, but small. You can combine a bunch of
 10 these things into one breed if you want to.
 11 Dobermans are muscular.

12 Q. Absolutely. Have you done any work or any
 13 research on dog bites and the severity based on
 14 physical capabilities of the animal?

15 A. No, I have not.

16 Q. Have you done any research on the severity
 17 of pit bull bites in relation to other breeds'
 18 bites?

19 A. No, I have not.

20 Q. What was your opinion of the huge group of
 21 pit bulls that you worked with? How do you feel
 22 about pit bulls in general?

23 A. So the group that I worked with, a lot of
 24 them were really nice dogs with people. A larger

Page 24

1 proportion of them were not nice dogs with other
 2 dogs compared to animals that I have worked with in
 3 shelters.

4 That's not surprising. They had been very
 5 carefully bred to have elevated aggression to other
 6 dogs, and they had been carefully raised that way
 7 too. So both genetics and environment were counting
 8 against them. It was interesting that even so, the
 9 younger dogs, the ones that hadn't been out in
 10 fights yet, some of them were really, really lovely
 11 dogs.

12 Q. "Really, really" what dogs?

13 A. Lovely dogs. Just really nice animals.

14 Q. Okay. Do you know anything about how pit
 15 bulls in that study, about the conditions in which
 16 they were raised? I know you said they were
 17 selectively bred. I guess in my head, we've all
 18 seen the pictures of pit bulls tied to 55-gallon
 19 barrels. Do you know anything about this group of
 20 pit bulls that you worked with?

21 A. A little bit. I was not there when they
 22 were seized, so I don't have firsthand experience.
 23 I did see the publicly released information that the
 24 ASPCA released. I had conversations with people

Page 25

1 onsite. So it sounded as though the housing that
 2 they were in was pretty typical housing for dog
 3 fighters. They were kept chained outside and not
 4 allowed to interact with each other. They were fed
 5 sufficiently, but kept quite thin. So healthy, but
 6 very, very lean. Leaner than the normal pet dog
 7 would be.
 8 Q. What do you think the reason, the
 9 rationale, is for the limited feeding?
 10 A. Gosh, I'm a little uncomfortable answering
 11 that. I did learn during my internship about
 12 exactly, like, sort of how dog fighters raise these
 13 dogs and why, but I'm not sure I recall exactly why
 14 they keep them so thin. I do know they do, but I'm
 15 not sure I recall why.
 16 Q. Okay. Have you ever worked on any breed
 17 specific bans or done any studies on any breed bans
 18 at all?
 19 A. No, I have not.
 20 Q. Have you read the City of Sioux City's
 21 ordinance regarding pit bull types?
 22 A. No. I talked with Gene briefly about it
 23 last night. He gave me a high-level overview, but I
 24 haven't read it.

Page 26

1 Q. What is your opinion of breed bans
 2 currently?
 3 A. I don't think it is the most rational way
 4 to approach dealing with dangerous dogs. I think
 5 that in the pet dog population, that environment has
 6 such a massive effect on whether a dog is going to
 7 grow up to be a dangerous dog, that those gene
 8 variances that make a dog be at risk for being
 9 aggressive, particularly to humans -- which, I
 10 think, is what we are more concerned about than
 11 aggression to other dogs -- those are just not
 12 concentrated in any particular breed in the pet dog
 13 population in such a way that it makes sense to try
 14 to solve the problem by banning breeds.
 15 I think the problem, as has been
 16 demonstrated in scientific papers, is much more
 17 dependent on how the dog is raised, and that an
 18 approach of trying to promote just the normal kind
 19 of good dog ownership practices, that those of us
 20 who are trying to do it right know how to do it and
 21 it's not all that hard. But looking into finding
 22 how people are raising and managing dogs in such a
 23 way that dogs attack, I think that makes much more
 24 rational sense.

Page 27

1 Q. What would be the best way, if a city had a
 2 problem with dog bites, what would you recommend in
 3 lieu of a breed specific ban? I think you touched
 4 on that.
 5 A. I would say that the Journal of the
 6 American Veterinary Medical Association published a
 7 paper -- I'm happy to get you guys this reference --
 8 where a task force sat down and put together some
 9 model legislation, so the example is out there of
 10 what the veterinary medical community recommends as
 11 a way to approach this problem.
 12 I would have a two-pronged approach. I am
 13 very big on prevention, so I would be looking into,
 14 you know, what are the reasons why dangerous dogs
 15 are developing and what can we do about it? Are
 16 there dogs that are being kept out on chains? Are
 17 there dogs that are being allowed to roam? What are
 18 those issues and is there a way that we can go try
 19 to change the situations for those dogs? And there
 20 is plenty of non-profit groups that are happy to
 21 help with that.
 22 On the other side of it, what do you do
 23 once a dog has become a dangerous dog? Then you
 24 really have to deal with the dog as an individual.

Page 28

1 So having a definition of a dangerous dog, not based
 2 on breed, but what the dog has done -- has the dog
 3 bitten a person or another dog? How badly has it
 4 bitten them? Then working with the owner to try to
 5 figure out if there is a way to make sure the dog is
 6 appropriately managed, or if the dog can't be
 7 appropriately managed, then working with the owner
 8 to make sure the owner doesn't get another such dog
 9 or create another such dog. That's how I would
 10 focus it, two-pronged. One, prevention and,
 11 secondly, focusing on individual dogs and individual
 12 owners.
 13 Q. Would you agree then that in that approach,
 14 you would say every dog gets one chance? Every dog
 15 gets, basically, a free bite? Would that be true?
 16 A. Not necessarily. I think there can be
 17 plenty of warning signs before a dog bites. I think
 18 if people are complaining that there is a dog that's
 19 on a chain and it's barking ferociously at
 20 passersby, I wouldn't give that dog a chance to
 21 bite. I would go intervene. And by "intervene," I
 22 mean I'd go have a conversation with the owner, find
 23 out why the dog is on the chain, what I can do about
 24 the dog.

Page 29

1 Q. What if the owner won't talk to you?
 2 **A. I have done a lot of work with the ASPCA**
 3 **during my internship dealing with hoarding**
 4 **situations, which are also fairly similar to this.**
 5 **There are groups who deal with these kinds of**
 6 **problems and have expertise in it. At a high level,**
 7 **having the city talk to some of those groups and use**
 8 **their expertise to deal with some of those problems**
 9 **might be a really great approach.**
 10 **The way the ASPCA deals with it is to keep**
 11 **coming back and try to have a relationship with the**
 12 **person. So not coming in saying, You are managing**
 13 **your dog poorly and we're going to take your dog**
 14 **away from you, in which case it's very likely the**
 15 **person is not going to talk to you.**
 16 **But coming in and saying, How can we help?**
 17 **We notice your dog is on a chain. Is that because**
 18 **you don't have a fence? Can we put up a fence?**
 19 **We notice your dog isn't inside. Why is**
 20 **that? Can we help with that? Do you have enough**
 21 **dog food?**
 22 **Has your dog been neutered, spayed,**
 23 **vaccinated? Can we provide those services to you?**
 24 **The U.S. has a lovely Pets for Life program**

Page 30

1 **where they go house to house and build a**
 2 **relationship with people. They put out free**
 3 **training classes. They give first and then they**
 4 **start, once they have the relationship with people,**
 5 **they start then trying to push people in the right**
 6 **direction.**
 7 **Now that's not to say that if there is sort**
 8 **of a really obvious danger, that you wouldn't step**
 9 **in. I think, you know, if you are getting multiple**
 10 **community complaints of a dog that people are afraid**
 11 **of, then that might be time to step in, not give the**
 12 **dog a chance to bite if the person won't talk to**
 13 **you.**
 14 **I think you that will find in a lot of**
 15 **cases, an approach of building a relationship with**
 16 **people first works pretty well.**
 17 **(Short recess taken.)**
 18 **Q. I want to know how much time you had spent**
 19 **preparing for this case, or if you have done any**
 20 **work? I want to know how much time you have spent.**
 21 **A. Yeah, sure. So I wrote a report, about a**
 22 **page and a half. That probably took me about an**
 23 **hour to write. That was some number of months ago.**
 24 **Gene and I were on the phone for about an**

Page 31

1 **hour last night. Then after that, I spent about**
 2 **another hour reading the reports from the other**
 3 **deposed individuals to catch up on what they were**
 4 **all saying.**
 5 **MR. SUMMERLIN: Just to be clear,**
 6 **Justin, I provided her with all the expert reports,**
 7 **so not all of those people have been deposed yet.**
 8 **A. But I read all the records.**
 9 **Q. Okay. Have you had a chance to look at**
 10 **Dr. Beck's report?**
 11 **A. Yes.**
 12 **Q. Are you familiar with Dr. Beck?**
 13 **A. I was not until yesterday.**
 14 **Q. Okay. What is your general overview**
 15 **opinion of Dr. Beck's report?**
 16 **A. It's interesting. It was written in 2005**
 17 **and not updated and a massive number of things have**
 18 **happened since 2005.**
 19 **Q. What has happened since 2005?**
 20 **A. There's been a lot of research, some really**
 21 **interesting studies. Several studies, a body of**
 22 **work talking about how difficult it is for people to**
 23 **identify the breed basis of a dog based just on a**
 24 **visual assessment. So that's all happened fairly**

Page 32

1 **recently.**
 2 **A lot of new genetics resources have come**
 3 **out since 2005. We sequence the dog genome right**
 4 **around then or a little after that. The genetics**
 5 **resources we have to study dogs have changed**
 6 **massively since then. That's been a big change.**
 7 **What was the other thing I was going to**
 8 **say? The really interesting paper that came out,**
 9 **the Patronek paper came out, I think in 2012 or**
 10 **something like that, this ten-year study where they**
 11 **had followed all the dog-bite fatalities in the U.S.**
 12 **for ten years, and did a lot of work tracking down.**
 13 **So what is the media report of what the breed of dog**
 14 **is? And then how valid is that media report?**
 15 **People were identifying dogs, it turned**
 16 **out, based on what they looked like, but when they**
 17 **tracked down and tried to either get genetic tests**
 18 **from the dogs or to find out if the dog was**
 19 **registered or if the parentage was known, they found**
 20 **that the correlation between the media's report and**
 21 **what the dog actually was quite poor.**
 22 **That study also documented really nicely**
 23 **how a major, major risk factor for a dog fatally**
 24 **wounding a human was how much experience the dog had**

Page 33

1 with interacting with humans. So that there is a
 2 huge risk that if a dog is sort of put out, kept on
 3 a chain, kept out in a yard without being able to
 4 come into the house and be a family dog -- they
 5 refer to it as a resident dog -- just that lifestyle
 6 alone was a massive risk factor.
 7 Q. Were you given or have you received any
 8 information on the dog bites in Sioux City prior to
 9 2007?
 10 **A. No.**
 11 Q. If I told you that in 2007, the City of
 12 Sioux City's dog population of registered dogs, mind
 13 you, 3 percent of those dogs were pit bulls, would
 14 you disagree with that?
 15 **A. You are talking about dogs that are**
 16 **registered as American Staffordshire terriers or**
 17 **American pit bull terriers?**
 18 Q. Correct.
 19 **A. Pit bull isn't a breed. I am curious.**
 20 Q. It's a breed under UKC but not under AKC?
 21 **A. You are talking about UKC registrations?**
 22 Q. No. I am talking about the
 23 City of Sioux City requires all dogs to be
 24 registered.

Page 34

1 **A. Oh, I see. So people are going to the city**
 2 **to get their dog licensed, registering their dog**
 3 **with the city, and they're writing pit bull down?**
 4 Q. Correct.
 5 **A. I would take it with a grain of salt, for**
 6 **sure. I think a lot of people get mixed-breed dogs**
 7 **from shelters. The shelters -- I have worked at a**
 8 **lot of shelters and there is a lot of pressure to**
 9 **define the dogs you get as a particular breed and**
 10 **there is a lot of like, well, it's got a blocky**
 11 **head, we'll say it's a pit bull mix.**
 12 **People adopt the dog. The shelter says**
 13 **it's a pit bull mix or a pit bull and people come**
 14 **away saying pit bull and that's what ends up going**
 15 **down on any sort of paperwork the people have to**
 16 **fill out. I would take it with a grain of salt.**
 17 Q. What if I told you that 47 percent of the
 18 dog bites were dogs who were registered, registered,
 19 as a pit bull? Basically, those 3 percent who
 20 rightly or wrongly are identified as a pit bull,
 21 were responsible for 47 percent of the dog bites in
 22 Sioux City, what would be your opinion of that
 23 statement?
 24 **A. Aside from the question of whether they**

Page 35

1 actually are pit bulls, the other question is
 2 whether people are more likely to report a dog bite
 3 because they think that the dog is a pit bull.
 4 That's another real issue in the media and in
 5 reporting in general.
 6 You can actually get a bite from a
 7 dachshund where the teeth go in, you are bleeding,
 8 but you sort of look at it and you're like, well, I
 9 can put a Band-Aid on it and you don't report it.
 10 If you get a bite like that from what you
 11 believe to be a pit bull, you are much more likely
 12 to, you know, oh, God, this dog could have killed
 13 me, and go report it, and it's the same level of
 14 bite. I would also take that with a bit of a grain
 15 of salt.
 16 Q. Wouldn't you say, though, because we
 17 discussed earlier the characteristics of the pit
 18 bull -- and when I say "pit bull" I mean --
 19 **A. The pit bull-type dogs.**
 20 Q. -- the pit bull-type dogs we've been
 21 discussing.
 22 You said the pit bull had some
 23 characteristics that made its bite most likely more
 24 severe -- size of the head, extreme strength --

Page 36

1 wouldn't that be true that when a pit bull bites
 2 it's going to be more severe and, hence, more
 3 reportable?
 4 **A. Yeah. I think any large dog breed can do**
 5 **that kind of damage.**
 6 Q. If we parlay your study with when we were
 7 discussing the dogs in the dog fight and why dog
 8 fighters like pit bulls, it was the size of the
 9 head, the size of the jaw, their strength. Wouldn't
 10 that correlate if they are good in a dog fight,
 11 wouldn't they be good, effective, when they do want
 12 to go after a human being, wouldn't it make their
 13 bite more severe than a dachshund?
 14 **A. It's definitely going to be more severe**
 15 **than a dachshund. I think your question is whether**
 16 **it's more severe as a labrador retriever, though.**
 17 Q. That can be my next question.
 18 **A. So a labrador retriever with a blocky**
 19 **head -- some have blocky heads and some don't -- a**
 20 **labrador retriever is physically quite capable of**
 21 **doing plenty of damage, right? So it's not that --**
 22 **I had this conversation with my brother**
 23 **recently. I was like, "You know your St. Bernard**
 24 **could kill you."**

Page 37

1 He said, "What?"
 2 I said, "She's big enough to kill you."
 3 He said, "I never thought about that."
 4 Any big dog can do that much damage. So I
 5 think it would be an interesting study to do, right?
 6 Are people -- is it actually that pit bull-type dogs
 7 are more likely to bite people or is it they are
 8 more likely to be reported because people have this
 9 fear of pit bull-type dogs? I don't think that
 10 study has been done.
 11 Q. Sure. I think I would agree with you on
 12 that.
 13 Jessica, do you own any dogs yourself?
 14 A. I do. I have two.
 15 Q. What breed are they?
 16 A. One of them is a definite thing. She is
 17 labrador retriever, Samoyed, and a bunch of other
 18 stuff we're not sure about.
 19 The other is an English shepherd. It's
 20 sort of a border collie or Australian-type breed.
 21 Q. Sure. Where did you get those dogs from?
 22 A. The mixie mix, I got from a shelter. The
 23 Australian shepherd, I got from a breeder in
 24 Virginia.

Page 38

1 Q. How were you retained in this case,
 2 Jessica?
 3 A. Can you clarify the question?
 4 Q. How were you retained? Were you sought out
 5 by the opposing counsel in this case? How did you
 6 become involved in this case?
 7 A. I have a relationship with the National
 8 Canine Research Council, which is closely affiliated
 9 with Animal Farm Foundation. I suspect -- I got a
 10 phone call from the lawyers, but I believe my name
 11 was provided to them by NCRC.
 12 Q. How much are you being paid?
 13 A. Today nothing. NCRC pays me \$1,000 a year
 14 to be available for this kind of case.
 15 MR. VONDRAK: Gene, I think that's
 16 about all I have. We're going to be done in time
 17 for your 10:00.
 18 MR. SUMMERLIN: I appreciate this,
 19 Justin. Give me about two minutes.
 20 (Short recess taken.)
 21 MR. SUMMERLIN: You have the
 22 ability to read and sign the deposition after it's
 23 been transcribed, like we talked about. You need to
 24 tell the court reporter if you would like to read it

Page 39

1 and sign it.
 2 THE WITNESS: I would like to read
 3 it and sign it.
 4 (Adjourned at 10:50 AM.)
 5 COURT REPORTER: Mr. Summerlin, in
 6 what format would you like your transcript?
 7 MR. SUMMERLIN: Electronic.
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24

Page 40

1 ATTACH TO THE DEPOSITION OF: Jessica Hekman
 2 CASE: Kali Myers vs City of Sioux City, Iowa
 3 ERRATA SHEET INSTRUCTIONS:
 4 After reading the transcript of your
 5 deposition, please note any change or correction to
 6 your testimony and the reason on this sheet. DO NOT
 7 make any marks or notations on the transcript volume
 8 itself. Please sign and date this errata sheet,
 9 before a Notary Public if required.
 10
 11 PAGE LINE CHANGE OR CORRECTION AND REASON
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 I have read the foregoing transcript of my
 21 deposition taken on January 22, 2018, and except for
 22 any corrections or changes noted above, I hereby
 23 subscribe to the transcript as an accurate record of
 24 the statements made by me.

 Jessica Hekman Date

COMMONWEALTH OF MASSACHUSETTS
Middlesex, ss.

I, Norma Flynn Borelli, Registered Professional Reporter and Notary Public duly commissioned and qualified in and for the Commonwealth of Massachusetts, do hereby certify that there came before me on the 22nd day of January 2018, the person hereinbefore named, who was by me duly sworn to testify to the truth and nothing but the truth of their knowledge touching and concerning the matters in controversy in this cause; that they were thereupon examined upon their oath, and their examination reduced to typewriting under my direction and that the deposition is a true record of the testimony given by the deponent.

I further certify that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto or financially interested in this action.

In Witness Whereof, I have hereunto set my hand and affixed my seal this 14th day of February 2018.

Notary Public
My Commission Expires:
August 28, 2020
CSR No. 102793

<p style="text-align: center;">A</p> <p>abilities 20:10 ability 5:1 18:4 38:22 able 7:19,20 33:3 Absolutely 23:12 accurate 40:21 action 41:10,12 actual 10:16 16:22 Adjourned 39:4 adopt 34:12 advanced 6:15 affect 4:24 10:12 12:24 affectionate 20:22 21:5 affiliated 38:8 affixed 41:14 afraid 30:10 afternoon 9:5 ages 5:20 aggression 20:24 24:5 26:11 aggressive 10:9,13 11:1,13,23 12:3,8 12:15 13:23 14:14 14:16,16,23 15:5 26:9 aggressiveness 14:8 ago 12:11 30:23 agree 28:13 37:11 ahead 18:5 AKC 33:20 alcohol 4:24 allowed 25:4 27:17 American 19:1,9 27:6 33:16,17 amounts 11:22 analyzed 8:10 animal 6:19 22:19 23:14 38:9 animal's 8:12 animals 8:14 10:11 10:23 24:2,13 animate 22:11</p>	<p>answer 5:1 12:17 12:17 13:10 answering 5:4,8 25:10 answers 4:19 16:10 anxious 13:5 APPEARANCES 2:1 applicable 15:16,23 16:7 applies 16:14 appreciate 38:18 approach 26:4,18 27:11,12 28:13 29:9 30:15 appropriately 28:6 28:7 area 18:15,18 21:2 Article 3:7,8,9,10 3:12,13,14,15 aside 18:15 34:24 ASPCA 17:5,10,11 17:12,24 24:24 29:2,10 assessment 18:18 31:24 assessments 18:9 18:10 assistant 2:11 18:11 ASSOCIATES 1:18,23 Association 27:6 ATTACH 40:1 attack 26:23 attorney 2:11 3:2 4:9 41:10,11 ATTORNEYS 3:18 attractive 20:9 22:18 audible 4:18 August 41:23 Australian 37:23 Australian-type</p>	<p>37:20 available 38:14</p> <hr/> <p style="text-align: center;">B</p> <p>B 3:4 back 6:3 7:13 13:12 15:8 29:11 background 5:13 5:15 6:1 bad 16:7 badly 28:3 ban 27:3 Band-Aid 35:9 banning 26:14 bans 25:17,17 26:1 barking 28:19 barrels 24:19 based 23:13 28:1 31:23 32:16 basically 8:6 10:24 28:15 34:19 basis 31:23 battlefield 13:12 beagles 11:4 Beck 31:12 Beck's 31:10,15 behave 12:2,4 22:4 behavior 6:16,17 6:24 8:9 10:12 12:24 14:11 16:1 behavioral 7:11 18:8,9 behaviorally 12:2,4 18:1 behaviorist 17:11 behaviors 7:21 8:15 9:9 11:8 believe 35:11 38:10 Bernard 36:23 best 13:21 27:1 biddable 20:13 big 18:14 27:13 32:6 37:2,4 bigger 22:20 binary 15:1</p>	<p>bioinformatics 6:21 biomedical 6:8 7:15 bit 7:13,14 9:23 10:2 12:23 13:4 16:4 17:8 20:7 22:20 24:21 35:14 bite 15:7 22:19 28:15,21 30:12 35:2,6,10,14,23 36:13 37:7 bites 23:13,17,18 27:2 28:17 33:8 34:18,21 36:1 bitten 28:3,4 BLACKWELL 2:4 bleeding 35:7 blocky 22:22,24 23:7 34:10 36:18 36:19 body 31:21 border 37:20 Borelli 1:21 41:2 born 13:3 bounds 6:12 brain 11:11,15 12:5 bred 10:23 24:5,17 breed 19:9,21 20:5 20:5 22:24 23:10 25:16,17 26:1,12 27:3 28:2 31:23 32:13 33:19,20 34:9 36:4 37:15 37:20 breeder 37:23 breeding 10:8 breeds 18:22,23 19:3 20:3 23:3,4 26:14 breeds' 23:17 brief 5:24 briefly 25:22 bring 18:18 Broad 7:4</p>	<p>brother 36:22 brought 17:22 build 30:1 building 30:15 bull 18:24 19:1,9 20:9 22:18 23:17 25:21 33:17,19 34:3,11,13,13,14 34:19,20 35:3,11 35:18,18,22 36:1 bull-type 35:19,20 37:6,9 bulls 19:6,11,13 23:21,22 24:15,18 24:20 33:13 35:1 36:8 bunch 12:16 17:12 23:7,9 37:17 business 17:24 bust 17:5</p> <hr/> <p style="text-align: center;">C</p> <p>C 4:1 cage 15:5,6,8 cages 16:4 California 2:5 call 4:10 8:22 13:6 16:24 38:10 calm 9:11 Canine 38:8 capabilities 23:14 capable 36:20 capacity 1:11,12 carefully 24:5,6 case 1:6 17:5 29:14 30:19 38:1,5,6,14 40:1 cases 30:15 catch 31:3 cause 41:6 CBS/AP 3:13 cellular 12:6 15:14 certify 41:4,9 chain 28:19,23 29:17 33:3</p>
---	--	--	---	--

<p>chained 25:3 chains 27:16 chance 28:14,20 30:12 31:9 change 27:19 32:6 40:3,6 changed 21:8 32:5 changes 40:21 characteristics 20:8 22:17 35:17,23 Charter 3:6 CINDY 1:11 city 1:10,10 2:11,12 3:6 25:20 27:1 29:7 33:8,11,23 33:23 34:1,3,22 40:1,1 City's 25:20 33:12 clarify 38:3 classes 6:16 30:3 clear 15:12,12 31:5 closely 38:8 club 17:1 coat 11:5 Code 3:6 collie 37:20 color 11:5 combine 23:9 come 8:5 13:8,12 22:11 32:2 33:4 34:13 comfortable 20:21 coming 8:1,3 29:11 29:12,16 Commission 41:22 commissioned 41:3 Commonwealth 41:1,4 community 27:10 30:10 companion 21:18 comparative 6:8 7:15 compare 22:23 compared 24:2</p>	<p>complaining 28:18 complaints 30:10 completely 20:21 computer 6:3 concentrate 19:18 concentrated 19:23 26:12 concerned 26:10 concerning 41:6 conditions 24:15 confounding 10:17 considered 6:13 continue 5:22,23 20:5 controlled 11:15 controversy 41:6 conversation 28:22 36:22 conversations 24:24 coordinate 17:19 Correct 33:18 34:4 correction 40:3,6 corrections 40:21 correlate 36:10 correlation 9:7 32:20 correlations 8:13 cortisol 8:10,11,14 9:1,9 11:16 12:1,3 12:9 Council 38:8 counsel 38:5 41:10 41:11 counting 24:7 country 17:16 court 1:4,21,24 38:24 39:5 covered 10:6 cranial 8:4 crazy 22:1 create 28:9 cruciate 8:5 CSR 1:21 41:24 cuddly 20:22</p>	<p>cum 6:2 Cummings 6:4 curious 33:19 currently 4:23 26:2 CV 7:8</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 3:1 4:1 dachshund 35:7 36:13,15 damage 36:5,21 37:4 danger 30:8 dangerous 26:4,7 27:14,23 28:1 date 40:5,24 day 8:24 9:2 41:4 41:14 deal 27:24 29:5,8 dealing 26:4 29:3 deals 29:10 decide 22:14 decided 6:3 DEFENDANT 2:9 Defendants 1:12 define 34:9 definite 37:16 definitely 9:17 36:14 definition 28:1 degree 6:5 demonstrated 26:16 dependent 26:17 deponent 41:8 deposed 31:3,7 deposition 1:15 4:13,17,18 38:22 40:1,3,20 41:8,11 depressed 13:5 detail 7:2 developing 27:15 development 20:24 differences 11:18 11:21 15:13,14</p>	<p>different 8:14 10:18,18,19 11:21 12:16 15:24 16:1 17:12,20 difficult 17:18 31:22 direction 30:6 41:8 directly 18:10 disagree 33:14 discussed 35:17 discussing 35:21 36:7 dispose 18:4 DISTRICT 1:4,5 DIVISION 1:5 Dobermans 23:11 doctorate 6:6 documented 32:22 dog 6:24 9:11 10:17 16:24 17:5 18:6 18:17,20,20,21 19:8,16 20:9,10 20:15,20 21:2,3,7 21:10,10,11,12,12 21:13,14,18,18,24 22:8,9,12,19 23:13 25:2,6,12 26:5,6,7,8,12,17 26:19 27:2,23,23 27:24 28:1,2,2,3,5 28:6,8,9,14,14,17 28:18,20,23,24 29:13,13,17,19,21 29:22 30:10,12 31:23 32:3,13,18 32:21,23,24 33:2 33:4,5,8,12 34:2,2 34:12,18,21 35:2 35:3,12 36:4,7,7 36:10 37:4 dog-bite 32:11 dogs 7:12,21,22,23 8:1,1,3,3,4,6,20 9:3,5,6 10:15 11:2 13:19,20,23,24</p>	<p>15:16,17,23 16:1 16:6,8,13,19,21 16:21,23 17:2,2,9 17:12,16,22 18:1 18:5,11,13,16,21 18:22 19:12 20:1 20:18,24 21:1 22:1,2,5 23:2,3,5 23:24 24:1,2,6,9 24:11,12,13 25:13 26:4,11,22,23 27:14,16,17,19 28:11 32:5,15,18 33:12,13,15,23 34:6,9,18 35:19 35:20 36:7 37:6,9 37:13,21 doing 7:5 12:14,22 18:3 36:21 dozen 20:20 Dr 4:11 31:10,12 31:15 dual 6:5,9 duly 4:5 41:3,5 duress 5:4</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 3:1,4 4:1,1 19:4 earlier 35:17 early 13:14 easily 13:5,5 easy 20:14,17 Edition 3:7 education 7:8,9 educational 5:13 5:15,24 6:12,13 7:7 17:7 effect 14:2,3,13 26:6 effective 36:11 either 10:8 14:23 17:19 32:17 Electronic 39:7 elevated 20:23 24:5 emotional 5:3</p>
--	--	--	---	---

<p>employed 41:10,12 employee 41:11 ends 34:14 energy 20:13 English 37:19 entailed 10:3 entire 16:24 environment 10:14 10:18 14:1,2 16:3 24:7 26:5 environments 10:21 16:2,7 errata 40:2,5 Esq 2:4,10 establish 18:2 estimate 8:12 evaluate 18:1 evening 9:2 events 13:7 eventually 13:10 exactly 9:16 14:10 25:12,13 examination 3:2 4:8 41:7 examined 4:6 41:7 examining 8:20 example 27:9 exhibited 7:21 8:15 Exhibits 3:18 4:2 expect 19:1,7 experience 13:14 24:22 32:24 experienced 18:8 experiences 10:19 13:13 expert 31:6 expertise 29:6,8 Expires 41:22 explanation 11:24 explanations 12:7 explicitly 16:20 expressed 11:21 expression 11:18 11:19 extreme 35:24</p>	<hr/> <p>F</p> <hr/>	<p>41:2 focus 7:18 28:10 focused 7:11 focusing 7:10 28:11 followed 32:11 follows 4:7 fond 21:4 food 29:21 force 27:8 foregoing 40:20 forensic 6:17 forensics 6:16 format 39:6 found 15:13,20 16:10 32:19 Foundation 38:9 four 17:19 fox 3:11 7:1 10:5 14:6 fox2now.com 3:14 foxes 10:4,8,13,13 10:20 11:6,11,12 11:12,22,23 12:1 12:3,8,14 13:10 13:17 14:9,15,16 14:22,24 15:3,5 15:11,19 16:2,11 16:22 Framingham 1:19 free 28:15 30:2 frequently 21:1 front 15:6 full 22:10 further 41:9,11</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>G 4:1 Gainesville 17:23 gene 2:4 11:18,19 25:22 26:7 30:24 38:15 gene.summerlin... 2:6 general 23:22 31:14 35:5</p>	<p>generally 6:13 8:3 19:8 genes 11:21 19:22 genetic 13:3 32:17 genetically 14:8 20:11 genetics 6:20,24 7:12 10:12 11:7 12:24 13:13 14:2 14:12 24:7 32:2,4 genome 32:3 genomics 6:20 getting 12:19 16:17 21:4 30:9 give 5:24 28:20 30:3,11 38:19 given 33:7 41:8 go 4:16 6:3 10:15 11:10 14:21,24 15:5,8 17:20 18:17 21:6 22:8 22:13 27:18 28:21 28:22 30:1 35:7 35:13 36:12 goal 7:20 goals 19:15 God 35:12 goes 20:15 going 9:20 11:3 13:16 15:19,22 16:8 18:2,6 20:5 26:6 29:13,15 32:7 34:1,14 36:2 36:14 38:16 golden 22:10 good 12:23 16:7 21:15 26:19 36:10 36:11 Gosh 25:10 graduated 6:2,8 graduating 7:3 grain 34:5,16 35:14 great 13:22 29:9 greyhounds 23:6 ground 4:16</p>	<p>group 23:20,23 24:19 groups 19:16,17 27:20 29:5,7 grow 26:7 growing 16:1 guess 24:17 guide 19:16 guys 27:7</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>H 3:4 half 9:4 30:22 hand 41:14 handle 20:18 happened 11:5 31:18,19,24 happy 7:1 15:17 27:7,20 hard 26:21 Harvard 5:18 7:4 head 4:19 15:15 22:18,20,22,24 23:7 24:17 34:11 35:24 36:9,19 heads 36:19 healthy 8:3,6 25:5 Hekman 1:15 3:2 4:4,10,11,12 40:1 40:24 Held 1:17 help 13:10 27:21 29:16,20 helpful 14:5 helps 16:15 hereinbefore 41:5 hereto 41:12 hereunto 41:13 hide 15:8 high 12:8 20:13 29:6 high-level 25:23 higher 12:3 highly 21:22 history 5:19</p>
--	-----------------------------	---	--	--

<p>hitting 15:6 hoarding 29:3 hold 22:9,11 holding 8:22 21:11 home 8:2 homes 18:3 honestly 5:5 21:24 hope 13:9 16:10 hormone 8:11 9:1 11:16 hospital 7:22 8:1,6 hospitalized 16:21 hour 9:4,4 30:23 31:1,2 hours 9:12 house 30:1,1 33:4 housed 17:23 housing 25:1,2 huge 23:20 33:2 human 16:4,5 20:14 21:15 32:24 36:12 humans 10:10 13:2 13:3,6,18 18:21 20:17 21:15 22:15 26:9 33:1 hundreds 17:13 HUSCH 2:4 hypotheses 15:18 hypothesis-buildi... 16:12</p> <hr/> <p style="text-align: center;">I</p> <p>Identification 4:3 identified 4:5 34:20 identify 7:20,20,22 31:23 identifying 32:15 Illinois 6:21 11:9 11:11 immediately 15:6 22:13 important 20:14 incredibly 16:3 individual 1:8 15:9</p>	<p>27:24 28:11,11 individuals 15:2 31:3 information 24:23 33:8 injure 8:4 injuries 8:4 inside 3:7 29:19 Institute 7:4 INSTRUCTIONS 40:2 intensively 14:10 interact 15:3 21:5 22:14 25:4 interacted 20:20 interacting 22:7,12 22:15 33:1 interaction 16:4,5 interactions 18:19 interest 10:16 interested 6:23 11:14 12:12 13:2 13:19 19:20,22 41:12 interesting 15:14 15:18 16:12 24:8 31:16,21 32:8 37:5 internship 6:11,11 6:14,15 7:6 25:11 29:3 intervene 28:21,21 interventions 7:23 involved 38:6 involvement 17:9 Iowa 1:5,10 2:12 40:1 issue 35:4 issues 27:18</p> <hr/> <p style="text-align: center;">J</p> <p>Jack 23:8 January 1:15 40:20 41:4 jaw 22:17 36:9</p>	<p>Jessica 1:15 3:2 4:4 4:10,14 37:13 38:2 40:1,24 job 6:13 7:7 22:9 journal 17:1 27:5 Justin 2:10 5:11 31:6 38:19 jvondrak@sioux... 2:13</p> <hr/> <p style="text-align: center;">K</p> <p>Kali 1:8 40:1 keep 25:14 29:10 kennel 8:22 18:14 kept 25:3,5 27:16 33:2,3 kill 36:24 37:2 killed 35:12 kind 5:23 21:24 26:18 36:5 38:14 kinds 13:18 29:5 knee 8:4 knew 17:10 18:9 22:3 know 8:17,17 9:16 11:24 13:20 14:1 14:12 18:5 19:2,7 19:15 24:14,16,19 25:14 26:20 27:14 30:9,18,20 35:12 36:23 knowing 14:7 19:7 knowledge 20:7 41:6 known 32:19</p> <hr/> <p style="text-align: center;">L</p> <p>laboratory 11:4 13:1 labrador 19:17 36:16,18,20 37:17 large 13:7 36:4 larger 23:24 largest 17:15 laude 6:2</p>	<p>lawyers 38:10 lean 25:6 Leaner 25:6 learn 5:12 25:11 leash 20:22 legal 18:4 legislation 27:9 level 8:13 12:6 15:14 29:6 35:13 levels 8:11,14 9:9 12:1,3 licensed 34:2 lieu 27:3 life 10:19 13:8,14 29:24 lifestyle 33:5 ligament 8:5 liked 15:11 20:1 21:19 limited 25:9 line 10:9 40:6 lines 19:10 literature 5:19 little 5:12 7:13,14 9:23 10:2 12:23 16:3,4 17:8 20:7 22:20 23:8 24:21 25:10 32:4 long-running 12:18 look 31:9 35:8 looked 8:13 9:15,18 11:17,17,20 19:5 32:16 looking 10:20 11:7 15:1 26:21 27:13 lost 15:9 lot 7:7 8:4 10:6,16 13:17 14:5,20 16:22 18:8,9 20:15 23:23 29:2 30:14 31:20 32:2 32:12 34:6,8,8,10 lovely 24:10,13 29:24 lower 12:1</p>	<p>lucky 17:4</p> <hr/> <p style="text-align: center;">M</p> <p>magna 6:2 maintained 10:14 15:21 major 32:23,23 managed 28:6,7 managing 26:22 29:12 marked 4:3 marks 40:4 Massachusetts 1:19 41:1,4 massive 14:2,13 18:14 26:6 31:17 33:6 massively 32:6 master 7:15 master's 6:7 7:18 11:16 16:18,20 Mastiff 23:6 matter 5:12 matters 41:6 mean 28:22 35:18 meant 18:20 media 3:12 32:13 32:14 35:4 media's 32:20 medical 27:6,10 medication 4:24 medicine 6:5,7,14 meet 11:11 14:22 meeting 15:2 mental 5:4 mentioned 20:4 met 15:3,4 middle 5:20 Middlesex 41:1 mind 14:22 33:12 minimize 10:19 minutes 8:8,21 9:13 38:19 MIT 7:4 mix 34:11,13 37:22</p>
--	--	--	---	--

<p>mixed 19:3 mixed-breed 34:6 mixie 37:22 model 7:1 10:11 14:12 15:11 27:9 models 12:24 13:2 Monday 1:15 months 7:18 30:23 move 9:22 16:13 multiple 18:15 30:9 muscular 23:2,3,5 23:6,9,11 Myers 1:8 40:1</p> <hr/> <p style="text-align: center;">N</p> <p>N 3:1 4:1 name 5:11 38:10 named 41:5 National 38:7 NCRC 38:11,13 Nebraska 2:5 necessarily 9:16 28:16 need 4:18 8:16 38:23 neither 41:9 neutered 29:22 never 37:3 new 32:2 News 3:11 nice 10:11,22 14:12 14:21 19:20 23:24 24:1,13 nicely 32:22 night 8:2,24 25:23 31:1 nod 4:19 non-profit 27:20 Norma 1:21 41:2 normal 25:6 26:18 NORTHERN 1:5 Nos 4:2 Notary 4:6 40:5 41:3,21 notations 40:4</p>	<p>note 40:3 noted 40:21 notice 29:17,19 number 3:5 13:7 30:23 31:17</p> <hr/> <p style="text-align: center;">O</p> <p>O 4:1 oath 41:7 obvious 12:13 30:8 obviously 11:9 official 1:11,12 oh 34:1 35:12 okay 4:23 8:19 9:22 16:15 24:14 25:16 31:9,14 older 22:1 Omaha 2:5 once 18:17 20:4 21:19 22:14 27:23 30:4 ones 24:9 onsite 25:1 open 16:8 opinion 20:9 23:20 26:1 31:15 34:22 opposing 38:5 orders 17:24 ordinance 25:21 Ordinances 3:6 organ 15:15 organized 16:24 original 12:19 outside 25:3 overlap 14:13 overnight 8:7 overview 5:24 25:23 31:14 owner 28:4,7,8,22 29:1 owners 28:12 ownership 26:19</p> <hr/> <p style="text-align: center;">P</p> <p>P 4:1</p>	<p>PADMORE 1:11 page 3:5 30:22 40:6 Pages 1:3 paid 38:12 Pam 17:10 paper 9:18,19 17:1 27:7 32:8,9 papers 26:16 paperwork 34:15 parentage 32:19 parlay 36:6 part 6:15 participated 16:23 particular 19:19 26:12 34:9 particularly 7:22 11:14 23:1 26:9 parties 41:10,12 passed 14:8 passersby 28:20 Patronek 32:9 pause 22:13 pays 38:13 people 7:7 10:18 13:1,9,17,23 18:8 23:24 24:24 26:22 28:18 30:2,4,5,10 30:16 31:7,22 32:15 34:1,6,12 34:13,15 35:2 37:6,7,8 percent 33:13 34:17,19,21 perform 18:19 person 28:3 29:12 29:15 30:12 41:5 personalities 21:8 pet 10:15 11:2 15:16 25:6 26:5 26:12 Pets 29:24 Ph.D 6:19 9:22 16:17,21,24 17:6 17:11 phone 4:17 30:24</p>	<p>38:10 physical 5:3 23:14 physically 21:11 36:20 pictures 24:18 pit 18:24 19:1,4,5,9 19:11,13 20:9 22:18 23:17,21,22 24:14,18,20 25:21 33:13,17,19 34:3 34:11,13,13,14,19 34:20 35:1,3,11 35:17,18,19,20,22 36:1,8 37:6,9 pituitary 15:15 place 17:17 placed 18:3 plaintiff 1:8 2:2 5:12 plan 18:6 please 40:3,5 pleased 21:5 plenty 27:20 28:17 36:21 poor 32:21 poorly 29:13 population 15:21 21:23 26:5,13 33:12 populations 14:14 14:19 Post 3:8,9,10 postdoc 7:5 practices 26:19 predict 22:2 predisposition 13:4 predominant 18:23 Preferably 4:11 preparing 30:19 press 10:6 pressure 34:8 pressures 15:24 pretty 16:23 25:2 30:16 prevent 5:7</p>	<p>prevention 27:13 28:10 previously 11:3 prior 18:3 33:8 probably 8:16 20:6 30:22 problem 26:14,15 27:2,11 problems 29:6,8 Professional 1:24 41:3 program 6:6,9,23 12:18 29:24 programmer 6:3 prohibit 5:4 project 10:5 promote 26:18 proportion 24:1 provide 29:23 provided 3:18 31:6 38:11 PTSD 13:12 Public 4:6 40:5 41:3,21 publicly 24:23 published 27:6 pull 21:2 puppies 22:5 pure 19:20 purebred 19:1,8 push 30:5 put 7:8 8:21 9:17 27:8 29:18 30:2 33:2 35:9</p> <hr/> <p style="text-align: center;">Q</p> <p>qualified 41:3 question 7:19 12:14 12:21 13:19,20 15:16,19 16:9,10 34:24 35:1 36:15 36:17 38:3 questions 5:1,8 7:14 8:17 13:9,10 13:18</p>
--	--	---	--	---

<p>quite 20:13 25:5 32:21 36:20</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 4:1 raise 13:21,24 25:12 raised 10:17 16:2 24:6,16 26:17 raising 26:22 RARRAT 1:11 rational 26:3,24 rationale 25:9 read 9:23 17:1 25:20,24 31:8 38:22,24 39:2 40:20 reading 16:23 31:2 40:3 real 16:5 35:4 really 7:6,8 10:11 12:17,23 13:19 14:10,10,12,21 15:3,8,12,17 16:6 16:8,11 19:18 21:9,13,19,19 23:24 24:10,10,12 24:12,13 27:24 29:9 30:8 31:20 32:8,22 reason 12:22 19:23 25:8 40:4,6 reasons 27:14 recall 25:13,15 received 33:7 recess 30:17 38:20 recommend 27:2 recommends 27:10 record 5:14 8:8,9 40:21 41:8 recording 7:24 records 31:8 redirecting 21:14 reduced 41:7 refer 33:5</p>	<p>reference 27:7 regarding 25:21 region 11:18 regions 11:15,17,22 registered 32:19 33:12,16,24 34:18 34:18 41:2 registering 34:2 registrations 33:21 Reid 17:10 related 17:6 41:10 relation 23:17 relationship 29:11 30:2,4,15 38:7 relative 41:11 released 21:12 24:23,24 relevant 6:17 12:21 remember 9:15,20 report 3:11 30:21 31:10,15 32:13,14 32:20 35:2,9,13 reportable 36:3 reported 9:18,19 37:8 reporter 1:21 38:24 39:5 41:3 Reporters 1:24 reporting 1:18,23 35:5 reports 31:2,6 represent 5:11 required 40:5 requires 33:23 research 7:10,11 12:10,11 16:22 17:6 23:13,16 31:20 38:8 researchers 12:20 resident 33:5 resilient 13:6 resources 32:2,5 responded 18:20 18:21 responsible 34:21</p>	<p>restraining 21:11 retained 38:1,4 retriever 36:16,18 36:20 37:17 retriever-ish 22:10 retrievers 19:18 right 8:21 19:17 21:4,11,17 26:20 30:5 32:3 36:21 37:5 rightly 34:20 ring 21:10 risk 20:23 26:8 32:23 33:2,6 roam 27:17 ROBERT 1:11 robust 13:6 role 18:12 rottweilers 19:12 19:24 RPR 1:21 rules 4:16 run 9:12 runs 8:23 Russell 23:8 Russia 10:7 14:21 Russian 10:5</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 3:4 4:1 safe 18:2 20:19 saliva 8:10 salt 34:5,16 35:15 Samoyed 37:17 samples 11:12 sat 27:8 satisfactorily 4:5 saying 29:12,16 31:4 34:14 says 34:12 scared 15:4,9 scars 22:2 school 6:4,4 7:18 science 7:15 16:18 sciences 6:8,20 7:16</p>	<p>scientific 14:7 17:1 26:16 seal 41:14 second 7:17 secondly 28:11 see 11:20 16:13 21:1 24:23 34:1 seen 21:23 24:18 seize 17:20 seized 17:12 24:22 seizure 17:15 selected 8:2 14:10 15:24 selection 11:2,4 15:24 19:15 selectively 24:17 send 13:11 sense 4:21 14:17 26:13,24 sent 17:4 sequence 32:3 services 29:23 set 18:15,19 41:13 settle 9:4 severe 35:24 36:2 36:13,14,16 severity 23:13,16 sheet 40:2,4,5 shelter 6:14,16 34:12 37:22 shelters 24:3 34:7,7 34:8 shepherd 37:19,23 Short 30:17 38:20 Siberia 10:7 11:10 11:10 side 27:22 sign 38:22 39:1,3 40:5 signs 28:17 similar 10:14,21 13:13 29:4 simultaneously 17:21 Sioux 1:10 2:12</p>	<p>25:20 33:8,12,23 34:22 40:1 situation 21:20 situations 27:19 29:4 Sixth 2:11 size 11:5 20:1 22:10 22:17,18 35:24 36:8,9 small 23:9 smaller 20:1 smart 20:12 socialization 16:6 socialize 13:21 soldiers 13:11 solely 16:1 solve 26:14 somewhat 10:18 sort 5:22 6:11 7:9 10:24 22:11 25:12 30:7 33:2 34:15 35:8 37:20 sought 38:4 sounded 25:1 spayed 29:22 special 23:2 specialty 6:14 specific 9:7 11:22 18:19 19:15 25:17 27:3 specifically 6:20,24 11:1 16:18 speed 20:2 spent 30:18,20 31:1 ss 41:1 St 36:23 Staffordshire 33:16 start 19:20 20:3 21:3 30:4,5 started 10:7,8 12:20 19:24 20:4 Starting 5:16 statement 34:23 statements 40:22 STATES 1:4</p>
---	--	---	---	--

<p>step 7:9 30:8,11 stop 22:7,15 straddles 6:12 7:6 straightforward 11:7 Street 1:19 2:5,11 strength 22:17 35:24 36:9 stress 8:13 stressed 7:23 12:2,5 13:4 strong 20:12 22:23 23:1 stronger 22:19 studied 5:19 studies 5:17 25:17 31:21,21 study 10:6,15 14:6 24:15 32:5,10,22 36:6 37:5,10 studying 6:23 10:4 10:12 11:16 stuff 37:18 subscribe 40:21 sufficiently 25:5 Suite 2:5,11 Summerlin 2:4 31:5 38:18,21 39:5,7 super 23:6 sure 7:17 9:3,20,21 10:4 19:2 21:16 22:16 25:13,15 28:5,8 30:21 34:6 37:11,18,21 surgery 8:5 surprising 24:4 suspect 38:9 swab 8:10 switch 21:21 sworn 4:5 41:5</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 3:4 take 14:6 19:8,17</p>	<p>29:13 34:5,16 35:14 taken 4:13 30:17 38:20 40:20 41:11 talk 7:1 11:19 12:19 29:1,7,15 30:12 talked 25:22 38:23 talking 31:22 33:15 33:21,22 tame 10:8,13,24 11:12,22,24 12:15 14:15,15,23 15:3 target 7:23 task 27:8 team 10:5 18:7 teams 18:15,16 teeth 35:7 tell 7:14 10:2 17:8 22:20 38:24 ten 32:12 ten-year 32:10 tend 19:8,17 20:13 20:17 terms 14:7,7 22:17 terrible 13:24 terriers 19:2,9 23:8 23:8 33:16,17 test 18:20 21:7 testified 4:7 testify 41:5 testimony 3:1 40:4 41:8 testing 22:8 tests 32:17 thesis 9:23 thin 25:5,14 thing 14:11 16:12 22:10 32:7 37:16 things 8:12 15:20 15:22 23:10 31:17 think 8:16 12:18,21 17:14,19 19:23 22:16,23 23:1 25:8 26:3,4,10,15</p>	<p>26:23 27:3 28:16 28:17 30:9,14 32:9 34:6 35:3 36:4,15 37:5,9,11 38:15 thinking 14:23 thought 16:11 37:3 three 9:11 18:16 tied 24:18 time 8:24 9:4,6 17:14 18:6 21:12 30:11,18,20 38:16 timelines 9:10 times 21:17 timing 9:15 today 5:8 6:18 12:17,21,22 38:13 told 33:11 34:17 touched 12:22 27:3 touching 41:6 tracked 32:17 tracking 32:12 traditional 19:4,5 train 20:14 trained 21:22 training 20:15 21:2 30:3 traits 19:19 transcribed 38:23 transcript 39:6 40:3,4,20,21 traumatic 13:7 Tribune 3:12 tried 32:17 true 4:18 28:15 36:1 41:8 truth 41:5,6 truthfully 5:1,5,9 try 10:15 15:13 26:13 27:18 28:4 29:11 trying 9:14 12:5 13:2 14:3 15:7 26:18,20 30:5 Tufts' 6:4</p>	<p>turn 13:22 14:1 turned 21:21 32:15 turning 21:14 two 14:14,19,24 37:14 38:19 two-pronged 27:12 28:10 type 18:24 19:4,4 22:10 types 19:12,19 25:21 typewriting 41:7 typical 25:2</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>U.S 29:24 32:11 UKC 33:20,21 um-hum 4:19 uncomfortable 25:10 undergraduate 5:16,18 understand 13:15 UNITED 1:4 University 5:18 6:10,21 unnatural 15:21 16:3 unscathed 13:8 updated 31:17 upwards 17:14 Urbana-Champa... 6:22 use 7:20 13:17 29:7</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vaccinated 29:23 valid 32:14 variables 10:17 variance 19:21 variances 26:8 variation 14:20 15:10 varied 8:23 16:6 varies 9:1</p>	<p>Varying 9:10 versus 9:12 11:23 12:15 veterinary 6:5,6 7:17 27:6,10 video 7:24 8:8 Virginia 37:24 visual 31:24 volume 1:3 40:4 Vondrak 2:10 3:2 4:9 5:11 38:15 vs 1:9 40:1</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>want 5:12,21 7:13 9:22 11:20 17:13 19:11,18 20:8 21:9,13 23:10 30:18,20 36:11 wanted 15:3 18:5 warehouse 18:14 warned 17:21 warning 28:17 Washington 3:8,9 3:10 Waverly 1:19 way 7:24 8:12 9:1 15:1 18:5 22:5 24:6 26:3,13,23 27:1,11,18 28:5 29:10 ways 12:16 we'll 8:22 34:11 we're 12:22 29:13 37:18 38:16 we've 15:21 24:17 35:20 week 11:10 17:2,5 well-known 10:5 went 5:18 6:4,10,19 22:14 WESTERN 1:5 Whereof 41:13 Wikipedia 3:15 wild 10:23,24</p>
---	--	--	---	--

Wire 3:12	0	4	
Witness 39:2 41:13	01702 1:19	4 3:2,6,7,8,9,10,11 3:12,13,14,15	
wondering 9:11	1	402.964.5014 2:6	
work 4:20 16:18,20 16:21 17:4 23:12 29:2 30:20 31:22 32:12	1 1:3 1,000 38:13 10:00 38:17 10:06 1:16 10:50 39:4	405 2:11 41 1:3 47 34:17,21	
worked 13:1 18:10 20:18 23:21,23 24:2,20 25:16 34:7	101 3:6 4:2 102 3:7 102793 41:24 102A 3:8 102B 3:9 102C 3:10 102D 3:11	5 5:16-cv-04107-L... 1:6 500 17:14 508 1:25 511 2:11 51102 2:12 55-gallon 24:18	
working 10:4 15:17 15:19 17:2,11 18:7,15,17 19:15 19:16 21:3 28:4,7	103 3:12 104 3:13 105 3:14 106 3:15 4:2 12 6:3 13330 2:5 14th 41:14 15 7:18 1960s 14:11	6 60s 10:7 12:20 68154 2:5	
works 30:16	12 6:3	7	
wouldn't 28:20 30:8 35:16 36:1,9 36:11,12	13330 2:5 14th 41:14 15 7:18 1960s 14:11	712.279.6318 2:12 755-1303 1:25	
wounding 32:24	106 3:15 4:2 12 6:3 13330 2:5 14th 41:14 15 7:18 1960s 14:11	8 873 1:19 888 1:25	
write 30:23	2		
writing 34:3	20 8:8,20 200 2:5 2005 31:16,18,19 32:3 2007 33:9,11 2012 6:9 32:9 2017 7:3 2018 1:15 40:20 41:5,14 2020 41:23 22 1:15 40:20 22nd 41:4 244-8858 1:25 28 41:23		
written 31:16	3		
wrongly 34:20	3 33:13 34:19 30 9:13		
wrote 30:21			
www.flynnreport... 1:25			
X			
X 3:1,4			
Y			
yard 33:3			
yards 17:20			
Yeah 10:1 14:9 19:7 21:22 30:21 36:4			
year 7:17 38:13			
year-long 6:11			
years 6:3 7:10 12:11 15:22 32:12			
yesterday 31:13			
younger 22:5 24:9			
Z			