

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
CHRISTOPHER J. WALL

DATE: Wednesday, January 17, 2018
LOCATION: Sioux City City Hall
Legal Division, Suite 511
405 Douglas Street
Sioux City, Iowa
(712) 279-6318
TIME COMMENCED: 11:49 a.m.
TIME CONCLUDED: 12:39 p.m.

A P P E A R A N C E S

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I N D E X

Appearances..... 2
Stipulations..... 4
Reporter's Certificate..... 51
Amendment to Deposition Page..... 52
WITNESS:
CHRISTOPHER J. WALL
Direct Examination by Mr. Hasan..... 5

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 CHRISTOPHER J. WALL 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 CHRISTOPHER J. WALL,
 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.")

6 DIRECT EXAMINATION

7 BY MR. HASAN:

8 Q. Will you please state your -- and spell your
 9 name for the record?

10 A. **My name is Christopher,**
 11 **C-h-r-i-s-t-o-p-h-e-r, John, J-o-h-n, Wall, W-a-l-l.**

12 Q. Is it all right if I call you Chris during
 13 this?

14 A. **Chris. Absolutely.**

15 Q. Okay. My name is Kamron. Feel free to call
 16 me by my first name, Kamron.

17 A. **Uh-huh. Sure.**

18 Q. Chris, have you ever had your deposition
 19 taken?

20 A. **No.**

21 Q. I will kind of go over some of the process.
 22 It's a conversation. It's going to be questions and
 23 answers. I will ask you questions. You give me
 24 verbal answers. It's all being recorded by Julie
 25 here. It's under oath, as you have just -- she just

1 administered that oath to you.

2 A. **Okay. Sure.**

3 Q. The purpose is to gather information in this
 4 lawsuit. Which are you aware that this lawsuit is
 5 going on?

6 A. **Sure.**

7 Q. It's to gather information to prepare for
 8 trial.

9 A. **Okay.**

10 Q. So do you understand that you are under
 11 oath?

12 A. **Yes.**

13 Q. Because you are under oath, will you answer
 14 truthfully and fully?

15 A. **Yep.**

16 Q. We need to do our best, both of us, in
 17 giving audible answers. So instead of uh-huh, huh-uh
 18 or head nods, do your best to answer yes, no. Is
 19 that okay?

20 A. **Yeah. Sure.**

21 Q. Also need to do our best, and not just for
 22 our sake but for Julie's sake, to not talk over each
 23 other. So I will do my best. I have a tendency to
 24 interrupt. I will do my best not to, and I will ask
 25 that you do the same. Is that all right?

1 A. **Okay.**
 2 Q. I probably will ask bad questions that
 3 aren't phrased right or maybe you don't understand
 4 fully. I ask you that if you don't fully understand
 5 a question, just ask me or mention it, and I will do
 6 my best to rephrase it --

7 A. **Okay.**

8 Q. -- so that you can answer it.

9 A. **Sure.**

10 Q. If you do come across one of those, I ask
 11 you to do that. And if you don't ask me, I will
 12 just -- I will assume that you understand the
 13 question. Is that fair?

14 A. **Yeah. Absolutely.**

15 Q. If you need a break during this, depending
 16 on -- it's 11:50 right now. If any of us get hungry
 17 and want to grab some food, yourself included, just
 18 let us know, or if you need a break for anything
 19 else, just let us know. I may ask you to let me
 20 finish a line of questioning first, but if you have a
 21 question, just let me know. Okay?

22 A. **Uh-huh. Uh-huh. Sure.**

23 Q. Your attorneys, who are here in the room,
 24 may lodge objections to some of my questions. Some
 25 of those may be because the question is poorly

1 phrased, in which case I will try to rephrase, but
 2 you -- as long as I ask a question, you are under a
 3 duty to answer that question unless your attorney
 4 instructs you not to.

5 A. **Okay.**

6 Q. I love asking these questions. Is there
 7 anything about your physical, emotional or mental
 8 conditions that will not allow you to understand my
 9 questions today?

10 A. **No.**

11 Q. Okay. Will you let me know if that changes?

12 A. **Sure.**

13 Q. Anything about your physical, emotional or
 14 mental conditions that will not allow you to give a
 15 truthful and complete answer?

16 A. **No.**

17 Q. Will you let me know if that changes?

18 A. **Sure.**

19 Q. Are you on any medication or alcohol that
 20 will not allow you to understand the questions?

21 A. **No.**

22 Q. Will you let me know if that changes?

23 A. **Yeah.**

24 Q. I think I'd be able to see you sneaking a
 25 drink. Same question for truthful and complete

1 answers?
 2 **A. Sure.**
 3 Q. Okay. Chris, what do you do for a living?
 4 **A. I work for Hannah, Incorporated, who**
 5 **performs a contract for the City of Sioux City for**
 6 **animal control services.**
 7 Q. What's your role with Hannah, Incorporated?
 8 **A. My position within the company is company**
 9 **vice president, company secretary. My physical**
 10 **description is working – mainly working the front**
 11 **desk, dealing with citizens and their animals.**
 12 Q. I think – is Cindy your wife?
 13 **A. Yes.**
 14 Q. Okay. I just wanted to make – confirm
 15 that.
 16 **A. Yes.**
 17 Q. Because she mentioned that you handled more
 18 of the dogs and she handled more of the cats; is that
 19 accurate?
 20 **A. Correct. Yeah.**
 21 Q. Okay. What's your education history?
 22 **A. Education was in Britain, finished –**
 23 **finished high school, went straight into work from**
 24 **high school.**
 25 Q. Where in Britain are you from?

1 **A. Cardiff, Wales.**
 2 Q. All right. I have been over there a couple
 3 of times. My sister was born in Cambridge.
 4 **A. Oh, okay.**
 5 Q. My parents lived there for a little while.
 6 Going to the animal realm –
 7 **A. Uh-huh.**
 8 Q. – animal kingdom, do you have any
 9 certifications, anything like that?
 10 **A. Not personally, no.**
 11 Q. Okay. Have you attended any seminars,
 12 conferences related to your job?
 13 **A. No.**
 14 Q. Receive any animal-specific training related
 15 to your job?
 16 **A. No.**
 17 Q. Attended any organizational meetings,
 18 anything like that? I am specifically referring to,
 19 like, the National Animal Control Association.
 20 **A. No.**
 21 Q. Or the American Humane Association?
 22 **A. No.**
 23 Q. Ever go to dog shows?
 24 **A. Yes.**
 25 Q. In what capacity?

1 **A. My wife shows – or, used to show our dogs**
 2 **before they became too old.**
 3 Q. She mentioned those dogs.
 4 **A. Yeah.**
 5 Q. So German Shepherds?
 6 **A. Yes.**
 7 Q. So what exactly are your job functions?
 8 **A. Basically customer service. I don't get**
 9 **involved with any of the animal control side. I am**
 10 **never in the animal control truck. I always deal**
 11 **with the people who come in to either surrender**
 12 **animals, to – who bring in found stray animals, or**
 13 **people who come to reclaim their animals, sale of**
 14 **city licenses, excuse me, taking impound fees, that**
 15 **kind of thing.**
 16 Q. Dealing with the public?
 17 **A. Yes. Absolutely 100 percent.**
 18 Q. You mentioned that you're not in the animal
 19 control truck ever?
 20 **A. Right. I never personally perform animal**
 21 **control duties.**
 22 Q. Any duties whatsoever?
 23 **A. Nothing related to dog catching.**
 24 Q. How about once they're back at the facility?
 25 Do you ever do, like, animal identification or...

1 **A. Very, very rarely. That's not my area of**
 2 **expertise. I am more of a paper and pen pusher.**
 3 Q. Okay.
 4 **A. The animal control officers and the – and**
 5 **the staff do the identifying. That's not something**
 6 **that I have expertise in.**
 7 Q. Are you ever asked to weigh in on what you
 8 think that an animal's breed may be?
 9 **A. Occasionally. But I am usually not the**
 10 **first choice.**
 11 Q. Okay. But you may be a choice in the
 12 ladder?
 13 **A. Yeah. Yeah.**
 14 Q. So what's your history with animals? What's
 15 your experience with them?
 16 **A. Basically very little back home. Since I**
 17 **have been working at the shelter for approximately**
 18 **six or seven years, and I was visiting here for**
 19 **three-month periods for about three or four years and**
 20 **prior to getting married – we've been married ten**
 21 **and a half years – so for about the last 12 or 13**
 22 **years I have been coming over to America, basically**
 23 **hanging out with Cindy before we got married, then**
 24 **started working full time there seven years ago,**
 25 **approximately.**

1 Q. So is it fair to say your animal experience
2 really started about 12 years ago? Is that what you
3 said?

4 **A. Yes.**

5 Q. Has that intensified over time or is it
6 just...

7 **A. I think it intensified through always
8 learning. Absolutely. I think that would be fair to
9 say.**

10 Q. All right. But it's hands-on experience,
11 being able to visually see animals, and that's how
12 you're...

13 **A. Yep. Yes.**

14 Q. Any other education courses you have done,
15 anything else?

16 **A. It – there's nothing – I have been on
17 numerous sort of more customer-service-related
18 courses at home rather than actual animal courses.**

19 Q. Okay. So you're – you are on the
20 administrative side rather than...

21 **A. Correct.**

22 Q. Okay. What would you call the other side,
23 the animal control side?

24 **A. The physical side maybe.**

25 Q. Physical side. That's – yeah, that's fair.

1 Will you please describe the hierarchy of Hannah,
2 Inc.?

3 **A. The hierarchy is Cindy Rarrat is president.
4 I am vice president, company secretary, the only
5 other shareholder in the company. And that is –
6 that is it.**

7 Q. Do people report to you?

8 **A. People report to me and/or Cindy. They –
9 Cindy is the primary shareholder, but they come to me
10 with stuff as well.**

11 Q. Do animal control officers report to you?

12 **A. Yeah.**

13 Q. Do they ever ask – I think you said it's
14 rare, but I want to make sure I am getting this
15 question right. Do they ever ask you to weigh in on
16 dog identification?

17 **A. By the – by the time that they come up, the
18 animal control officer makes out the impound card.
19 By the time that they come up with the – with the
20 animal, there's usually other office staff who are
21 more qualified in breed identification than me.**

22 **So they're hanging around the front office
23 and they'll say, yeah, okay, unfortunately, that's a
24 pit bull or, no, that's not a pit bull and that can
25 come go home, and all that other kind of stuff.**

1 Q. Okay. I want to get into – well, actually,
2 let's just get into that right now. How does that
3 determination process play out?

4 **A. Basically, we have the breed standards up
5 there at the shelter. One of the people who makes
6 the identification is an owner of two dogs herself
7 that would be banned under the pit bull prohibited
8 ordinance in the city. So she's got a very good
9 indication of what – of what they look like.**

10 Q. Who is that?

11 **A. Kenna Anderson.**

12 Q. So when you say would be banned under the
13 ordinance...

14 **A. Yeah. They – they are, in other words, pit
15 bulls or pit bull mixes. If she suddenly moved into
16 Sioux City, she couldn't bring them.**

17 Q. That was my follow-up question. So she
18 doesn't live in...

19 **A. No.**

20 Q. So she's part of the brain trust in
21 determining what else goes into determining whether a
22 dog's a pit bull or not?

23 **A. Right.**

24 Q. What else goes into it?

25 **A. Oh, the – a lot of it is the – you know,**

1 **the visual appearances. They – you know, again,
2 going back to the breed characteristics, when you
3 have – when you have worked with pit bulls for years
4 and years and years, you – you know, it's like you
5 may not know dogs particularly well, but you could
6 identify a German Shepherd walking down the road, you
7 know.**

8 Q. You picked your – the dog that you own.

9 **A. Right.**

10 Q. I can respect that.

11 **A. Right.**

12 Q. Okay. Is it a group of people who make this
13 determination?

14 **A. Typically the officers are very good in
15 making that call themselves. If there is any doubt,
16 then they'll bring it up for a second opinion.**

17 Q. So is the second opinion only brought in if
18 the animal control officer has a doubt?

19 **A. A lot of the times they do that anyway.**

20 **They bring – they bring it up anyway just for the –
21 so there's confirmation.**

22 Q. Okay. For that confirmation is there a
23 standard process or a procedure on the group
24 determining if it is one of these dogs?

25 **A. Visual.**

1 Q. But is there a -- it's a -- it's a visual
2 identification; right?
3 **A. Right.**
4 Q. Based on visual identification, how does the
5 group collectively decide?
6 **A. Uh...**
7 Q. Or, does the group collectively decide
8 whether the dog fits into definition?
9 **A. Yes. Yeah. Yeah.**
10 Q. How does it...
11 **A. Well, pretty much visual. You know, they**
12 **know the size and weight that these dogs are. They**
13 **know what their physical appearance is. And if**
14 **any -- and if looking at the dog, yeah,**
15 **unfortunately, that is a pit bull, it would be banned**
16 **under the pit bull ban.**
17 Q. And you're not involved in this process?
18 **A. Very little.**
19 Q. Okay. When you have observed this process,
20 you say that the group looks at it, is it like a
21 debate amongst members of the group, or how does that
22 work?
23 **A. A lot of them, it's so cut and dried there's**
24 **no debate. It's just, yep, it is. It is what it is.**
25 Q. How about situations where it is not cut and

1 dried?
2 **A. If somebody is -- if somebody is borderline,**
3 **then Cindy will actually get pulled in to make the**
4 **final -- the final decision. If something is not cut**
5 **and dried, we tend to err on the side of releasing**
6 **the dog to the owner, you know, if...**
7 Q. All right.
8 **A. But Cindy ultimately has the ultimate say.**
9 **That's if the group as a whole can't make a decision,**
10 **which is very rare.**
11 Q. Okay. But she's the ultimate
12 decision-maker?
13 **A. Yeah.**
14 Q. And I think you said that if the rest of the
15 group says, well, we can't tell whether or not it
16 fits into the definition...
17 **A. There's enough people there with enough**
18 **experience that they very rarely run into that**
19 **situation.**
20 Q. Okay. How often would you say you actually
21 go through and do the -- help with id- -- identifying
22 dogs?
23 **A. Very, very rarely.**
24 Q. Like as -- if you had to put an estimate on
25 your...

1 **A. Are we talking dogs in general or pit bulls?**
2 Q. Let's talk about identifying the breed of a
3 dog that has been impounded.
4 **A. The situation that I might have is if I take**
5 **pictures for the website and the kennel card or what**
6 **the officer thought it might have been was**
7 **something -- something different maybe, then we'll**
8 **get another head together and say, hey, does this**
9 **look like a Scottie dog or whatever, but basically**
10 **that's if there's nothing sort of serious.**
11 Q. Is that for purposes of putting it on the
12 website?
13 **A. The dogs go on the website. Yeah.**
14 Q. That's what the breed identification is for,
15 though?
16 **A. Right.**
17 Q. You mentioned the pictures. Do you guys
18 save those?
19 **A. Of all of the dogs we take or just pit**
20 **bulls?**
21 Q. Either. Either. Both.
22 **A. No. No.**
23 Q. Let's start with -- let's start with pit
24 bulls.
25 **A. No.**

1 Q. Do you take -- do you keep the pictures of
2 the dogs...
3 **A. No. No. Ultimately, we take the pictures.**
4 **We print them out. And as of -- as of late -- it**
5 **hasn't been that long that we've actually started**
6 **pinning them to the paperwork for the sign-out for**
7 **the city forms. So I am sure you found some that**
8 **have it and some that don't. The pictures are not**
9 **kept on -- not kept on record. They're printed off**
10 **and pinned to the file.**
11 Q. Is there a reason why that's the case?
12 **A. No. It -- up until the time that it was**
13 **actually suggested to us to print pictures and attach**
14 **them to the file, there was no need for us to take**
15 **pictures of them.**
16 Q. Do you know -- do you know if there's any
17 training or instruction given to the animal control
18 officers as to what kind -- do you know if there's
19 any training or instruction given to the animal
20 control officers on how to identify the breed of a
21 dog out in the field?
22 **A. Not that I am aware of. The training --**
23 **they do go to the National Animal Control Academy,**
24 **but they don't actually go into breed identification**
25 **and specifics. So, therefore, they have to do sort**

- 1 **of reading up on that kind of thing.**
 2 Q. They do continue reading up on it at...
 3 **A. Sure.**
 4 Q. Is that required, or is it based on the
 5 animal control officer's own...
 6 **A. Based on the animal control officer.**
 7 Q. Have you ever been – strike that.
 8 If you are asked to determine the breed of a
 9 dog, how do you make that determination?
 10 **A. It – it's of those things that you know.**
 11 **You know by sight. You know what a Rottweiler looks**
 12 **like, what a Doberman looks like, what a German**
 13 **Shepherd looks like.**
 14 Q. Okay.
 15 **A. You can tell if something comes in that's a**
 16 **lab mix. You can tell, oh, that's a lab-collie or**
 17 **that's – you just know. You pick it up.**
 18 Q. Do you ever refer to the printed materials,
 19 breed standards, things like that?
 20 **A. Not for the – not for the – not for the**
 21 **dogs.**
 22 Q. Do you know if other members in the
 23 department refer to the breed standards?
 24 **A. Not for the breeds of dog, no.**
 25 Q. It's based on what they think the dog is?

- 1 **A. Yeah. Yeah, ultimately. If the dog is not**
 2 **under the pit bulls prohibited ordinance, you know,**
 3 **we might think it's a terrier. The person – owner**
 4 **might tell us it's a Scottish Terrier, whatever. The**
 5 **dog can go home. There's no problem with going home;**
 6 **so we don't sort of push it that far.**
 7 Q. Okay. Are there a specific number of people
 8 who are on a pit bull enforcement team?
 9 **A. There – there's no such team.**
 10 Q. Okay.
 11 **A. I think that was a name that was – that was**
 12 **given. Bas- – basically, there's no specific**
 13 **number, but people – you know, we have animal**
 14 **control officers who have been there for 10 years, 12**
 15 **years. They know what a pit bull is.**
 16 **And then we've – then we've got, like I**
 17 **said, Kenna who has her own pit bulls. Jess worked**
 18 **with pit bull rescues. She's sent pit bulls out to**
 19 **rescue organizations. Then there's Cindy with 40**
 20 **years' experience. So there's no designated team.**
 21 Q. Okay. But all of these individuals, they're
 22 making their decisions based on their experience
 23 based on visual identification of a dog?
 24 **A. Correct. Correct.**
 25 Q. Man, this is going to be a lot quicker than

- 1 Cindy's was since you don't do the actual
 2 identification of dogs.
 3 Do you ever personally provide any training
 4 to the animal control officers?
 5 **A. Not personally.**
 6 Q. Are you familiar with the American Kennel
 7 Club and the United Kennel Club breed standards?
 8 **A. Yes.**
 9 Q. How are you familiar with those?
 10 **A. They were something that as soon as the ban**
 11 **came in we were printing copies off of the standards**
 12 **just so we knew for ourself this is what we're kind**
 13 **of looking for, and we keep on printing off updated**
 14 **copies as needed.**
 15 Q. You said when the ban was enacted. Were you
 16 affiliated at that time?
 17 **A. In 2009 I was not a – no. That was before**
 18 **my marriage. So, no, I wasn't.**
 19 Q. Do you know what Hannah, Inc., did in terms
 20 of enforcing the ban once it was enacted?
 21 **A. No.**
 22 Q. Are you familiar with visual characteristics
 23 and the science related when you have mixed-breed
 24 dogs?
 25 **A. Sure. If something is a mixed breed, I**

- 1 **could probably get pretty close and tell you what**
 2 **mixed breed it was.**
 3 Q. How do you make that determination?
 4 **A. Again, just through knowing what a**
 5 **particular breed looks like. So you might say, okay,**
 6 **that is part lab or part collie or that just from**
 7 **actually seeing the dog.**
 8 Q. Is that based on a collection of traits?
 9 **A. It – it's through seeing hundreds and**
 10 **hundreds of dogs a month coming through.**
 11 Q. Okay. I am going to go over some physical
 12 traits that I have pulled based on the National
 13 Animal Control Association group of characteristics
 14 for dogs.
 15 **A. Uh-huh.**
 16 Q. And I will ask you, for each one that I list
 17 off, to tell me if those are specific traits or
 18 characteristics that you consider when determining
 19 what kind of – the predominant breed of a
 20 mixed-breed dog.
 21 **A. Okay.**
 22 Q. Is that fair?
 23 **A. Uh-huh.**
 24 Q. Do you look at the color?
 25 **A. Occasionally. It's not that important.**

- 1 Q. How about the pattern of the color?
 2 **A. No.**
 3 Q. The coat texture?
 4 **A. Occasionally.**
 5 Q. The coat length?
 6 **A. Yeah.**
 7 Q. How about the body type?
 8 **A. Yes.**
 9 Q. The body length?
 10 **A. Yes.**
 11 Q. The overall weight?
 12 **A. Not nec- – not that – necessarily that**
 13 **important.**
 14 Q. Is that because some dogs are fat and some
 15 dogs are skinny?
 16 **A. Because dogs are overweight. Some dogs are**
 17 **fat. Absolutely.**
 18 Q. That makes sense. How about the muscle
 19 mass?
 20 **A. Yes.**
 21 Q. The chest size?
 22 **A. Yes.**
 23 Q. I believe this term is referred to as
 24 topline angle, the angle from where the shoulders are
 25 down to the hips?

- 1 **A. Only really applies in – if you're talking**
 2 **dog show German Shepherds. So it doesn't really –**
 3 **it doesn't really apply in general day to day.**
 4 Q. How about the length of the legs?
 5 **A. Not that important.**
 6 Q. Shape of the head?
 7 **A. Yes.**
 8 Q. Overall size of the head?
 9 **A. Yes.**
 10 Q. Does that include the length and the width?
 11 **A. Yeah.**
 12 Q. How about the muzzle?
 13 **A. Yep. That comes into it too.**
 14 Q. Eye color?
 15 **A. Not necessarily.**
 16 Q. Ear shape?
 17 **A. Yeah.**
 18 Q. Ear size?
 19 **A. Not that important.**
 20 Q. How about the neck?
 21 **A. Yeah.**
 22 Q. Do you ever look at teeth or jaws?
 23 **A. Not personally.**
 24 Q. Tongue color?
 25 **A. Sorry.**

- 1 Q. Tongue color?
 2 **A. Tongue color? Yeah. That can be. If you**
 3 **have got a Chow, you have got a black tongue. Yes.**
 4 Q. Tail shape?
 5 **A. Not really.**
 6 Q. How about the tail type or size?
 7 **A. No.**
 8 Q. Do you look at the gait, how it's walking
 9 around?
 10 **A. No.**
 11 Q. No? I am guessing if you don't look at how
 12 it's walking around, I know the answer to this next
 13 question. How about the agility of the dog?
 14 **A. No.**
 15 Q. The behavior?
 16 **A. No. It – because that's not necessarily a**
 17 **characteristic of the breed.**
 18 Q. Do you guys ever check DNA?
 19 **A. No.**
 20 Q. So I just listed off a bunch of different
 21 characteristics. For what's predominant, how do you
 22 weigh these different characteristics to determine
 23 what the predominant breed is?
 24 **A. Well, it depends, again, if we're talking**
 25 **pit bulls or if we're talking general, but with pit**

- 1 **bulls you're talking, you know, muscle mass. And**
 2 **it's – it's the head absolutely every time.**
 3 Q. Okay.
 4 **A. That's – that will do it. The head,**
 5 **muzzle, and the ears do vary in length a bit, but**
 6 **it's the actual build of the chest.**
 7 Q. So are there key indicators for the pit bull
 8 breeds? You mentioned the head and the chest. Is
 9 there anything else you can think of?
 10 **A. That – the head, chest, body mass and**
 11 **overall kind of height. That would be it.**
 12 Q. Are any of those outcome determinative,
 13 meaning that if the head is a certain way that's a
 14 pit bull?
 15 **A. The head will go a long way towards the**
 16 **appearance and characteristics.**
 17 Q. Okay. Anything else?
 18 **A. Again, body size and structure.**
 19 Q. Okay. But is the head the most important
 20 thing?
 21 **A. Equally important to the body size and**
 22 **structure.**
 23 Q. Okay. Any specific parts of the body size
 24 and structure that make you believe the dog is a pit
 25 bull?

1 **A. Typically the – you know, it's going to**
 2 **have the broad chest. That would be – pretty much**
 3 **at that point, I think if you have got the head and**
 4 **the broad chest, then you have – then you have**
 5 **reached the appearance side of it.**

6 Q. Okay. So those two things, the...

7 **A. Those things, obviously, are the most**
 8 **important, I would say.**

9 Q. All right. And when determining whether
 10 this dog we're describing, this hypothetical dog,
 11 fits under the pit bull ban, is there just looking –
 12 you have got the head and the chest, so it fits under
 13 the definition?

14 **A. You have got to go by appearance and**
 15 **characteristics.**

16 Q. Are you familiar with the science behind dog
 17 identification based on visual appearance?

18 **A. No.**

19 Q. Essentially what I am asking you is if
 20 you're aware of any of the science behind the idea of
 21 an individual's ability to look at physical
 22 characteristics of a mixed dog and accurately tell
 23 what the predominant breed of that dog is. Are you
 24 aware of any of that science?

25 **A. No.**

1 Q. So I think this is kind of where a little
 2 bit more of your background is going to come in. If
 3 a determination, whether it be the determination by
 4 the animal control officer out in the field or the
 5 revisited determination by the group back at the
 6 facility, the determination has been made that a
 7 subject dog is a pit bull, what happens after that?

8 **A. Once that – a lot of the times the majority**
 9 **of the pit bulls that we have never have any**
 10 **identification, and very few people actually call**
 11 **looking for them because they kind of know that that**
 12 **was a pit bull and it was in the city and it**
 13 **shouldn't be.**

14 If an owner does come forward, then they
 15 have ten days to remove the dog from the city. They
 16 have one of the sign-up forms that we – that we have
 17 in the file. And then at that point they come to the
 18 shelter with somebody living outside of the city.

19 I get identifications from both of them.
 20 The dog is signed out of the city. It's microchipped
 21 at that point. And, as I said, as of late we have
 22 been taking photographs of them as well. I plead to
 23 the people, please don't bring it back into the city
 24 because that puts us in a real jam if you do.

25 And in the majority of the cases that's

1 **fine. They remove the dog, pay the impound fees if**
 2 **those have occurred, and the dog leaves the city.**

3 Q. What happens if the owner disputes that it
 4 is a pit bull?

5 **A. I have not yet seen somebody seriously**
 6 **dispute it as a pit bull.**

7 Q. When you say "seriously"...

8 **A. Well, I have not seen anybody who has put up**
 9 **an argument that their dog was not a pit bull. I am**
 10 **not aware of one.**

11 Q. Do you ever tell the owners when they come
 12 in that they can appeal the decision?

13 **A. No.**

14 Q. Do they have the right to appeal that
 15 decision?

16 **A. I believe so.**

17 Q. Are there ever any circumstances where an
 18 individual has a dog where the determination has been
 19 made that it's a pit bull or predominantly a pit bull
 20 under the code and you still let the dog go home with
 21 that person?

22 **A. If they live in Sioux City?**

23 Q. Yes.

24 **A. There was only one situation that I was ever**
 25 **aware of.**

1 Q. What was that?

2 **A. And that was Jennifer Frost, who was the**
 3 **initial litigant in this case.**

4 Q. Uh-huh.

5 **A. She wanted to take a dog back home because**
 6 **she was sending the dog back to – I believe it was**
 7 **New York. Jake. And a special exception was made**
 8 **for her.**

9 Q. Okay. But only her?

10 **A. That's the only one I know of, yeah.**

11 Q. So that there have never been any other
 12 examples where a dog has been picked up and
 13 determined to be a pit bull and allowed to go back
 14 home?

15 **A. No. No.**

16 Q. In your opinion are certain breeds more
 17 aggressive than others?

18 **A. I don't have a view on that. I really**
 19 **don't. I was just going to say, I just – just – I**
 20 **really don't.**

21 Q. One way or the other?

22 **A. No.**

23 Q. In your opinion are certain breeds more
 24 dangerous than others?

25 **A. Yes.**

- 1 Q. What breeds?
- 2 **A. We get dogs – obviously, if you get bit by**
- 3 **a pit bull or a Rottweiler, the damage to you is**
- 4 **going to be worse than if you were bitten by a Yorkie**
- 5 **or a Chihuahua.**
- 6 Q. So the bigger the dog...
- 7 **A. Typically the bigger – bigger and stronger**
- 8 **the dog. You know, we never had many cases of pit**
- 9 **bulls nipping people. When they were bites, they**
- 10 **were proper bites.**
- 11 Q. Proper bites.
- 12 **A. Worthwhile bites.**
- 13 Q. No, I got ya. I got ya. I am on the same
- 14 page. I understand.
- 15 In your experience are physical features,
- 16 characteristics that a dog outwardly displays, are
- 17 they predictive of the dog's behavior?
- 18 **A. I wouldn't know. I don't know.**
- 19 Q. So in your experience with your current
- 20 position, is it your opinion that a certain look of
- 21 dog tracks with that a certain behavior, like an
- 22 aggressive behavior?
- 23 **A. We've seen aggression in a lot of dogs. So**
- 24 **I don't specifically have an answer for that.**
- 25 Q. So different types of dogs can be

- 1 aggressive, different breeds?
- 2 **A. Yes.**
- 3 Q. Were you involved with the enforcement
- 4 actions against Kali Myers, the remaining plaintiff
- 5 in this case?
- 6 **A. I wasn't involved with the picking up of the**
- 7 **dog, but I was involved with the paperwork and**
- 8 **signing out of the city to her boyfriend in Le Mars,**
- 9 **I think it was.**
- 10 Q. Was there anything in that enforcement
- 11 mechanism that was different than what you were
- 12 talking about earlier about process that goes into
- 13 picking up a dog and then discharging it?
- 14 **A. Nope.**
- 15 Q. Have you talked to any city council members,
- 16 members of the city about the pit bull ban?
- 17 **A. No.**
- 18 Q. Talked to Cindy about the pit bull ban?
- 19 **A. We probably have over the last ten years,**
- 20 **but that...**
- 21 Q. It's a long time. I am not going to ask you
- 22 about specific conversations going that far back.
- 23 **A. Yeah. Yeah.**
- 24 Q. How about the efficacy of the ban? First
- 25 off, what do you think the ban is meant to do?

- 1 **A. I am not sure entirely of the reasons for**
- 2 **bringing it in. I think what happened was there were**
- 3 **a disproportionate number of bites would have**
- 4 **occurred by pit bulls or pit-bull-type dogs. That**
- 5 **was – I may be wrong, but that was – that was my –**
- 6 **that's my thinking.**
- 7 Q. Okay. Is it your belief that – strike
- 8 that.
- 9 Earlier you said that it's the stronger dogs
- 10 that are more dangerous breeds, things like
- 11 Rottweilers. You mentioned, I think, Rottweilers,
- 12 pit bulls.
- 13 **A. Not necessarily. Not necessarily in**
- 14 **themselves, but if you get bit by a Rottweiler,**
- 15 **you're going to know it, as opposed to getting bit by**
- 16 **a Chihuahua. I am not – I am not for one minute**
- 17 **saying all big dog – all big dogs are dangerous.**
- 18 Q. So – okay. Your experience specifically,
- 19 is there a reason to enforce a ban against a strong
- 20 dog like a pit bull as opposed to a strong dog like a
- 21 Rottweiler?
- 22 **A. I have no view on it.**
- 23 Q. No view in terms of...
- 24 **A. I have no view whether it's a good idea or a**
- 25 **bad idea.**

- 1 Q. In your experience has it been effective?
- 2 **A. The number of pit bull bites has certainly**
- 3 **reduced.**
- 4 Q. Sure, because there's less pit bulls, but
- 5 have the overall number of bites reduced?
- 6 **A. That – I – I don't have the actual**
- 7 **numbers. It would be the health department that has**
- 8 **the numbers for that.**
- 9 Q. So we should go to the health department?
- 10 **A. Uh-huh.**
- 11 Q. Okay. I am going to show you – you said
- 12 that occasionally you're brought in to chime in on
- 13 identification of...
- 14 **A. Not from a photograph, no.**
- 15 Q. Not from a photograph?
- 16 **A. No.**
- 17 Q. I will not show you pictures then.
- 18 You mentioned earlier that you're not up to
- 19 speed on the science that's associated with the
- 20 visual identification –
- 21 **A. Uh-huh.**
- 22 Q. – of a predominant breed just based on
- 23 physical characteristics, so I am not going to hold
- 24 you to the specifics of certain studies, but I want
- 25 you to assume what I am about to tell you is true –

1 **A. Okay.**
 2 Q. – in terms of the current state of the
 3 science, that if an individual with decades of
 4 experience and training on visually identifying dogs
 5 is incorrect 60 percent of the time in determining
 6 the predominant breed of a dog, would that change
 7 your opinion on how you determine a dog's breed when
 8 it's picked up?
 9 **A. No.**
 10 Q. No. So even...
 11 **A. Because it's still – visual is your**
 12 **primary – your primary indicator.**
 13 Q. How about if the DNA showed that the dog is
 14 10 percent a certain breed? Let's use – since we're
 15 talking about pit bulls, let's use pit bulls. So the
 16 dog is 10 percent American Staffordshire Terrier --
 17 **A. Uh-huh.**
 18 Q. – and 90 percent American Bulldog. If that
 19 dog comes into the facility and...
 20 **A. If it has the appearance and characteristics**
 21 **of a pit bull, then it's taken under the pit bull**
 22 **ban. Its DNA is not accepted in – for any forms of**
 23 **identification.**
 24 Q. So even if the DNA said, nope, it's 90
 25 percent a non-banned breed, it is still going to be

1 enforced?
 2 **A. The – I believe there are also studies that**
 3 **have said that DNA are totally unreliable.**
 4 Q. Okay. So the visual appearance is going to
 5 trump the DNA test?
 6 **A. Absolutely. Well, the DNA test doesn't even**
 7 **come into it. It's not – it's not something that's**
 8 **accepted.**
 9 Q. So if an owner were to present a DNA test to
 10 you, you wouldn't consider that?
 11 **A. Not at present, no.**
 12 Q. Okay. What factors would an owner be able
 13 to show you to show, hey, this dog actually isn't a
 14 pit bull, it's a mixed breed that turns out is a
 15 bulldog?
 16 **A. We would – we would ask for any prior**
 17 **history that they – that they have with it, but**
 18 **normally there's not a – it's not a whole great**
 19 **bunch. You know, if – now, if they adopted this dog**
 20 **from a registered breeder who has the parents'**
 21 **paperwork –**
 22 Q. Okay.
 23 **A. – and this dog was an offspring of those**
 24 **parents, then, okay, that would be – that would be**
 25 **acceptable, but normally it's very little else**

1 **because vet paperwork is also unreliable, what the**
 2 **veterinarian puts down on their paperwork.**
 3 Q. So, essentially, if the animal control
 4 department makes the determination that this dog
 5 looks like a pit bull, that's the final
 6 determination?
 7 **A. No, it's not the final. They have the right**
 8 **of appeal.**
 9 Q. So up to the point of that appeal, unless
 10 the – back up.
 11 From the time the dog is picked up up until
 12 the point of appeal, the only thing that will change
 13 animal control's mind as to the determination that a
 14 dog's a pit bull is proof showing the dog's
 15 parentage?
 16 **A. That would go a long way towards it, but**
 17 **it – there's very little else.**
 18 Q. Okay. So unless an owner is able to come
 19 forward with, hey, I bought this dog and it was a
 20 mixed breed between a boxer and an American Bulldog,
 21 unless that owner has that paperwork...
 22 **A. Right. If that dog matches the breed**
 23 **standards that we have, then it is what it is. Yeah.**
 24 Q. If the physical characteristics...
 25 **A. Right.**

1 Q. Okay. Do you know in the appeal process how
 2 it plays out?
 3 **A. I believe they set up a hearing with the**
 4 **city manager, and he takes – makes the ultimate call**
 5 **from there.**
 6 Q. Have you ever been involved with any of
 7 those?
 8 **A. Not personally. I am not sure of – I am**
 9 **honestly not sure if anybody has appealed to the city**
 10 **manager on a case.**
 11 Q. Okay.
 12 **A. But I have not personally been involved in**
 13 **one.**
 14 Q. In such a circumstance is it the city
 15 manager who has the final say of, yes, it is a pit
 16 bull, no, it's not a pit bull?
 17 **A. I don't know for sure.**
 18 Q. So going back to the point of appeal, since
 19 you haven't been involved with the appeals before,
 20 does it come down to the subjective discretion of the
 21 animal control officers based on their visual
 22 identification that's what decides, yes, the dog gets
 23 to stay because it has – does not fit the definition
 24 under the code or, no, it has to go?
 25 **A. I think primarily that that's accurate.**

1 Q. It's all based on that visual
2 identification?
3 **A. (Witness nods head up and down.)**
4 Q. And unless there's paperwork showing the
5 parents --
6 **A. Right.**
7 Q. -- that's not going to be --
8 **A. Right.**
9 Q. -- overturned?
10 **A. Right.**
11 Q. Who fills out all the paperwork for dogs
12 that are brought in?
13 **A. When a -- when a dog is impounded, the**
14 **animal control officer fills out the impound card in**
15 **99 percent of -- 99 percent of the time.**
16 **Occasionally they may come up to me and say, I am**
17 **rushing to another call, I have just put a dog in**
18 **C23, can you follow up with a card. But 99 percent**
19 **of the time --**
20 Q. I have looked through...
21 **A. -- it's the officers.**
22 Q. Okay. I have looked through some of the
23 enforcement records. And I asked Cindy about this
24 also, and I think I understand it, but I just want to
25 confirm. I notice a lot of the impound cards will

1 have the officer name on the top and the reason the
2 dog was picked up and --
3 **A. Sure.**
4 Q. -- something like that. The name may be on
5 it, but a lot of the time there are multiple
6 different types of handwriting on there. Why is
7 that?
8 **A. Well, we -- we've got -- the officers would**
9 **write out the -- write out the card, the initial**
10 **impound card. Then if somebody calls and says, I am**
11 **missing a dog and I think you just picked it up, at**
12 **that point the office staff would take the owner's**
13 **name and address, phone number and that kind of**
14 **stuff, so that could be a different. And then**
15 **occasionally we write down the side of the card what**
16 **the impound fees and microchip are, which may be**
17 **another office person that does that.**
18 Q. Okay. Okay. So it's just different
19 administrative hands touching the same document?
20 **A. Yeah. Right. Right.**
21 Q. Do the people who are taking down that
22 information have a say in the determination of
23 whether the dog is a pit bull or not? Say the person
24 answering the phone from the distressed owner saying,
25 hey, I am missing my dog, where's my dog, does that

1 person who's answering the phone have a say in
2 determining whether the dog is deemed a pit bull or
3 not?
4 **A. Typically the only person who answers the**
5 **phone other than myself is either Kenna or Jess, and**
6 **they are both two people who would sort of form the**
7 **unofficial group, if you like, of brainstorming to**
8 **get the dog's identification figured out.**
9 Q. Do you know if there's any instructions --
10 and if there are, are there -- what are the
11 instructions -- that are given to animal control
12 officers to go out and enforce the pit bull ban?
13 **A. There are no specific instructions. If**
14 **during the normal day-to-day duties they come across**
15 **one or one gets reported, it's just another call.**
16 **We're not on a hit list to go and get pit bulls or**
17 **anything like that.**
18 Q. I don't think you guys would have time to do
19 that.
20 **A. No. No, we don't.**
21 MR. HASAN: Do you guys want to take a
22 couple minutes? I think I am about done. Do you
23 want to take a couple-minute break?
24 MR. VONDRAK: Sure.
25

1 (A recess was taken from
2 12:29 p.m. to 12:33 p.m.)
3 Q. (By Mr. Hasan) Back on the record. Chris,
4 we talked about the initial determination of a dog
5 being classified as one of the prohibited pit bulls
6 being made by the animal control officer out in the
7 field and that sometimes there is a discussion back
8 at the facility about whether that dog actually is.
9 **A. Correct.**
10 Q. I think -- correct me if I am wrong, but I
11 think you said earlier that that's if there's a
12 challenge as to that initial officer's decision, like
13 if there's a question about whether that initial
14 officer's determination was correct or not. Is that
15 right?
16 **A. No.**
17 Q. How does that work?
18 **A. No. The -- an officer will impound the dog,**
19 **fill out the impound card. They will typically write**
20 **pit bull on it and bring it up to us and say, hey,**
21 **are we all on the same page that this is a -- this is**
22 **a pit bull? So it's not if anybody questions their**
23 **description of the dog.**
24 Q. So is it every time that a dog is written
25 down on the impound card, pit bull, that it goes for

1 further determination?
 2 **A. Unless a dog has been here previously at the**
 3 **shelter and all of the paperwork and already –**
 4 **already says it is a pit bull, then it can go back in**
 5 **the cage and that is the same dog because the**
 6 **microchip numbers match up.**
 7 Q. So unless there is preexisting paperwork,
 8 there's a group decision as to whether...
 9 **A. The dog is always brought for a second**
 10 **opinion from somebody. Yeah.**
 11 Q. That second opinion, is that always a group
 12 second opinion or is it...
 13 **A. We're – we're normally in the same**
 14 **workspace together. So it – it's not intentionally**
 15 **that way. That's just the way it is.**
 16 Q. How often are there disagreements?
 17 **A. Very, very rarely.**
 18 Q. What happens if there is a disagreement?
 19 **A. If there is a disagreement, then,**
 20 **ultimately, the poundmaster would have the ultimate**
 21 **say, but I cannot recall a time when there ever has**
 22 **been.**
 23 Q. Are you familiar with the animal section of
 24 the municipal code of Sioux City?
 25 **A. Uh-huh. Seven ten. Yeah. Or for the pit**

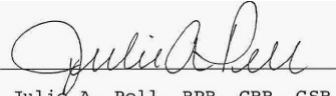
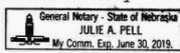
1 **bulls, seven ten.**
 2 Q. More broadly than that, just Chapter 7?
 3 **A. Okay. I – not off the top of my head,**
 4 **obviously, but, yeah.**
 5 Q. The reason I am asking, there's a
 6 definitions statute where it lists different
 7 definitions of different things.
 8 **A. Okay. Okay. Sure.**
 9 Q. Would you agree with me on that?
 10 **A. Sure.**
 11 Q. Would you agree with me that the city – and
 12 I am happy to pass them over to you if you'd like to
 13 look – the city defines what a dangerous animal is?
 14 **A. I would – I would need to look at the city**
 15 **ordinances to know that.**
 16 Q. I will pass you that. This – I will
 17 represent to you that this is a copy and paste job
 18 off of the city's website. And I know you don't have
 19 your glasses.
 20 **A. Sure. Yeah.**
 21 Q. But I have passed you three pieces of paper
 22 there. On each one is a different definition, and I
 23 will represent to you that that's a copy/paste job,
 24 so if there's been any changes the city has done on
 25 their website that it may not be reflected there.

1 But would you agree with me that if this is
 2 what I am describing to you, the city has defined
 3 dangerous animal?
 4 **A. Okay. Yes.**
 5 Q. Same question. Would you agree with me that
 6 the city has defined a high-risk animal?
 7 **A. Yes.**
 8 Q. Would you agree with me that the city has
 9 defined what a vicious animal is?
 10 **A. Yes.**
 11 Q. Did you do anything to prepare for this
 12 deposition today?
 13 **A. No.**
 14 Q. Did you review any documents, anything like
 15 that?
 16 **A. No. I pulled out Kali Myers' file to**
 17 **refresh myself. Like I said, we see hundreds of –**
 18 **hundreds of people a month.**
 19 Q. Did you speak to anyone to prepare, other
 20 than your attorneys? I don't want to know if you
 21 guys have talked.
 22 **A. No. No.**
 23 Q. I just want to make sure. You said earlier
 24 that photographs are now regularly being taken, but
 25 they're not stored.

1 **A. Right. The pictures – the pictures are**
 2 **printed, and they're attached to the sign-out of the**
 3 **city form. And I honestly don't feel there's a**
 4 **lot – much point to keeping them on the camera card**
 5 **once that has been achieved.**
 6 Q. And they're not saved on a hard drive
 7 anywhere?
 8 **A. No. No.**
 9 Q. When did you say that the policy changed to
 10 start taking pictures?
 11 **A. That was – that was something that we**
 12 **brought in – you know, occasionally now one or two**
 13 **sort of slip through the net, but we try and get the**
 14 **pictures as free – you know, as regularly as we can.**
 15 **And I know a year or – a year or so ago maybe,**
 16 **somewhere around there. The microchip is the main**
 17 **identification that we use.**
 18 Q. And just I can't remember if you talked
 19 about this, but why was it that about a year ago that
 20 you started taking the pictures?
 21 **A. I think it – I think it was good that –**
 22 **just to have a – the second backup. People started**
 23 **talking about removing the dogs' microchips and**
 24 **taking them to the vet and getting the microchip cut**
 25 **out. Yeah, we see it. So it was just like a backup**

1 **kind of deal.**
 2 Q. I think Tom Cruise did that in Mission
 3 Impossible II.
 4 **A. Oh, really?**
 5 Q. Yeah, I think so. That's probably where
 6 they got that idea.
 7 **A. No, people – people talk about it.**
 8 MR. HASAN: Much smoother than I thought.
 9 I think I am – I think I am done. That was nice.
 10 Have you got any follow-up?
 11 MR. VONDRAK: Not from me.
 12 MR. CHRISTOPHERSON: Not from me.
 13 MR. HASAN: All right. Then, Chris, we'll
 14 wrap up here. Do you guys want to discuss read and
 15 sign or do you want...
 16 MR. VONDRAK: Go ahead. You did a good job
 17 on the last one.
 18 MR. HASAN: You have the right under the
 19 rules to read and sign the transcript here of your
 20 deposition. So Julie has been recording everything,
 21 and there will be a transcript that you have the
 22 option to go through and look at the questions and
 23 the answers. And if you have any corrections to the
 24 comments – to the answers you have provided, you
 25 have the ability to submit written changes to those.

1 THE WITNESS: Okay.
 2 MR. HASAN: You have – also have the right
 3 to waive that right. So would you like to review and
 4 sign, or would you like to waive that right?
 5 THE WITNESS: Guidance, please?
 6 MR. VONDRAK: He'll review and sign.
 7 (The deposition concluded at 12:39 p.m.)
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1 C E R T I F I C A T E
 2 I, Julie A. Pell, RPR, CRR, CSR, CRC, duly
 3 commissioned, qualified, and acting under a general
 4 notarial commission within and for the State of
 5 Nebraska, do hereby certify that:
 6 CHRISTOPHER J. WALL
 7 was by me first duly sworn to tell the truth, the
 8 whole truth, and nothing but the truth; that the
 9 foregoing deposition was taken by me at the time and
 10 place herein specified and in accordance with the
 11 within stipulations; that I am not counsel, attorney,
 12 or relative of either party or otherwise interested
 13 in the event of this suit.
 14 IN TESTIMONY WHEREOF, I have hereunto set my
 15 hand officially and attached my notarial seal at
 16 Lincoln, Nebraska, this 20th day of January, 2018.
 17
 18 
 19 Julie A. Pell, RPR, CRR, CSR
 20 Nebraska Notary Public
 21 
 22
 23
 24
 25

1 AMENDMENT TO DEPOSITION
 2 CASE: Myers v. City of Sioux City, et al.
 3 WITNESS: CHRISTOPHER J. WALL _____ No Changes
 4 The Witness herein states that he/she wishes
 5 to make the following changes in his/her deposition:
 6

6	PAGE	LINE	CURRENTLY READS	SHOULD READ	REASON FOR CHANGE
7	_____	_____	_____	_____	_____
8	_____	_____	_____	_____	_____
9	_____	_____	_____	_____	_____
10	_____	_____	_____	_____	_____
11	_____	_____	_____	_____	_____
12	_____	_____	_____	_____	_____
13	_____	_____	_____	_____	_____
14	_____	_____	_____	_____	_____
15	_____	_____	_____	_____	_____
16	_____	_____	_____	_____	_____

 17 _____
 18 DEPONENT'S SIGNATURE
 19 ACKNOWLEDGEMENT State of _____
 20 County of _____
 21 The foregoing instrument was acknowledged
 22 before me this _____ day of _____, 20__.
 23 _____
 24 ^ Affix Seal Here ^ GENERAL NOTARY PUBLIC
 25

1	acting [1] 51/3 actions [1] 34/4 actual [4] 13/18 23/1 28/6 36/6 actually [10] 15/1 18/3 18/20 20/5 20/13 20/24 24/7 30/10 38/13 44/8 address [1] 42/13 administered [1] 6/1 administrative [2] 13/20 42/19 adopted [1] 38/19 affiliated [1] 23/16 Affix [1] 52/24 after [1] 30/7 again [4] 16/1 24/4 27/24 28/18 against [2] 34/4 35/19 age [1] 5/2 aggression [1] 33/23 aggressive [3] 32/17 33/22 34/1 agility [1] 27/13 ago [4] 12/24 13/2 48/15 48/19 agree [5] 46/9 46/11 47/1 47/5 47/8 agreed [1] 4/2 ahead [1] 49/16 al [1] 52/2 alcohol [1] 8/19 allow [3] 8/8 8/14 8/20 allowed [1] 32/13 aloud [1] 4/20 already [2] 45/3 45/4 also [5] 6/21 38/2 39/1 41/24 50/2 always [4] 11/10 13/7 45/9 45/11 Amendment [2] 3/5 52/1 America [1] 12/22 American [5] 10/21 23/6 37/16 37/18 39/20 amongst [1] 17/21 and/or [1] 14/8 Anderson [1] 15/11 angle [2] 25/24 25/24 animal [38] 9/6 10/6 10/8 10/14 10/19 11/9 11/10 11/18 11/20 11/25 12/4 13/1 13/18 13/23 14/11 14/18 14/20 16/18 20/17 20/19 20/23 21/5 21/6 22/13 23/4 24/13 30/4 39/3 39/13 40/21 41/14 43/11 44/6 45/23 46/13 47/3 47/6 47/9 animal's [1] 12/8 animal-specific [1] 10/14 animals [6] 9/11 11/12 11/12 11/13 12/14 13/11 another [4] 19/8 41/17 42/17 43/15 answer [7] 6/13 6/18 7/8 8/3 8/15 27/12 33/24 answering [2] 42/24 43/1 answers [7] 5/23 5/24 6/17 9/1 43/4 49/23 49/24 any [30] 7/16 8/19 10/8 10/11 10/14 10/17 11/9 11/22 13/14 16/15 17/14 20/16 20/19 23/3 28/12 28/23 29/20 29/24 30/9 31/17 32/11 34/15 37/22 38/16 40/6 43/9 46/24 47/14 49/10 49/23 anybody [3] 31/8 40/9 44/22 anyone [1] 47/19 anything [12] 7/18 8/7 8/13 10/9 10/18 13/15 28/9 28/17 34/10 43/17 47/11 47/14 anyway [2] 16/19 16/20 anywhere [1] 48/7 appeal [7] 31/12 31/14 39/8 39/9 39/12 40/1 40/18 appealed [1] 40/9 appeals [1] 40/19 appearance [7] 17/13 28/16 29/5	29/14 29/17 37/20 38/4 appearances [2] 3/2 16/1 applies [1] 26/1 apply [1] 26/3 approximately [2] 12/17 12/25 area [1] 12/1 aren't [1] 7/3 argument [1] 31/9 around [4] 14/22 27/9 27/12 48/16 ask [14] 5/23 6/24 7/2 7/4 7/5 7/10 7/11 7/19 8/2 14/13 14/15 24/16 34/21 38/16 asked [3] 12/7 21/8 41/23 asking [3] 8/6 29/19 46/5 Assistant [1] 2/9 associated [1] 36/19 Association [3] 10/19 10/21 24/13 assume [2] 7/12 36/25 attach [1] 20/13 attached [2] 48/2 51/15 attended [2] 10/11 10/17 attorney [3] 4/13 8/3 51/11 attorneys [3] 2/9 7/23 47/20 audible [1] 6/17 aware [6] 6/4 20/22 29/20 29/24 31/10 31/25
2	20 [1] 52/21 200 [1] 2/4 2009 [1] 23/17 2018 [2] 1/19 51/16 20th [1] 51/16 224-5203 [1] 2/11 279-6318 [2] 1/22 2/11	B
3	30 [1] 4/18	back [14] 11/24 12/16 16/2 30/5 30/23 32/5 32/6 32/13 34/22 39/10 40/18 44/3 44/7 45/4 background [1] 30/2 backup [2] 48/22 48/25 bad [2] 7/2 35/25 ban [12] 17/16 23/10 23/15 23/20 29/11 34/16 34/18 34/24 34/25 35/19 37/22 43/12 banned [4] 15/7 15/12 17/15 37/25 Bas [1] 22/12 based [12] 17/4 21/4 21/6 21/25 22/22 22/23 24/8 24/12 29/17 36/22 40/21 41/1 basically [6] 11/8 12/16 12/22 15/4 19/9 22/12 became [1] 11/2 before [6] 4/5 11/2 12/23 23/17 40/19 52/21 behavior [4] 27/15 33/17 33/21 33/22 behind [2] 29/16 29/20 being [6] 5/2 5/24 13/11 44/5 44/6 47/24 belief [1] 35/7 believe [6] 25/23 28/24 31/16 32/6 38/2 40/3 best [6] 6/16 6/18 6/21 6/23 6/24 7/6 between [2] 4/2 39/20 big [2] 35/17 35/17 bigger [3] 33/6 33/7 33/7 bit [5] 28/5 30/2 33/2 35/14 35/15 bites [7] 33/9 33/10 33/11 33/12 35/3 36/2 36/5 bitten [1] 33/4 black [1] 27/3 Blackwell [1] 2/3 body [6] 25/7 25/9 28/10 28/18 28/21 28/23 borderline [1] 18/2 born [1] 10/3 both [4] 6/16 19/21 30/19 43/6 bought [1] 39/19 Box [1] 2/10 boxer [1] 39/20 boyfriend [1] 34/8
4	40 [1] 22/19 402 [2] 2/5 2/5 405 [2] 1/21 2/9 447 [1] 2/10	
5	5000 [1] 2/5 5050 [1] 2/5 51 [1] 3/4 511 [2] 1/20 2/9 51102 [1] 2/10 52 [1] 3/5 5203 [1] 2/11 5:16-cv-04107-LRR [1] 1/3	
6	60 percent [1] 37/5 6318 [2] 1/22 2/11 68154 [1] 2/4	
7	712 [3] 1/22 2/11 2/11	
9	90 [2] 37/18 37/24 964-5000 [1] 2/5 964-5050 [1] 2/5 99 percent [3] 41/15 41/15 41/18	
A	a.m [1] 1/23 ability [2] 29/21 49/25 able [4] 8/24 13/11 38/12 39/18 absolutely [7] 5/14 7/14 11/17 13/8 25/17 28/2 38/6 Academy [1] 20/23 acceptable [1] 38/25 accepted [2] 37/22 38/8 accordance [1] 51/10 accurate [2] 9/19 40/25 accurately [1] 29/22 achieved [1] 48/5 acknowledged [1] 52/21 ACKNOWLEDGEMENT [1] 52/18 across [2] 7/10 43/14	

<p>B</p> <p>brain [1] 15/20 brainstorming [1] 43/7 break [3] 7/15 7/18 43/23 breed [29] 12/8 14/21 15/4 16/2 19/2 19/14 20/20 20/24 21/8 21/19 21/23 23/7 23/23 23/25 24/2 24/5 24/19 24/20 27/17 27/23 29/23 36/22 37/6 37/7 37/14 37/25 38/14 39/20 39/22 breeder [1] 38/20 breeds [7] 21/24 28/8 32/16 32/23 33/1 34/1 35/10 bring [7] 11/12 15/16 16/16 16/20 16/20 30/23 44/20 bringing [1] 35/2 Britain [2] 9/22 9/25 broad [2] 29/2 29/4 broadly [1] 46/2 brought [5] 16/17 36/12 41/12 45/9 48/12 build [1] 28/6 bull [42] 14/24 14/24 15/7 15/15 15/22 17/15 17/16 22/8 22/15 22/18 28/7 28/14 28/25 29/11 30/7 30/12 31/4 31/6 31/9 31/19 31/19 32/13 33/3 34/16 34/18 35/4 35/20 36/2 37/21 37/21 38/14 39/5 39/14 40/16 40/16 42/23 43/2 43/12 44/20 44/22 44/25 45/4 bulldog [3] 37/18 38/15 39/20 bulls [20] 15/15 16/3 19/1 19/20 19/24 22/2 22/17 22/18 27/25 28/1 30/9 33/9 35/4 35/12 36/4 37/15 37/15 43/16 44/5 46/1 bunch [2] 27/20 38/19</p>	<p>changed [1] 48/9 changes [7] 8/11 8/17 8/22 46/24 49/25 52/3 52/4 Chapter [1] 46/2 Chapter 7 [1] 46/2 characteristic [1] 27/17 characteristics [13] 16/2 23/22 24/13 24/18 27/21 27/22 28/16 29/15 29/22 33/16 36/23 37/20 39/24 check [1] 27/18 chest [7] 25/21 28/6 28/8 28/10 29/2 29/4 29/12 Chihuahua [2] 33/5 35/16 chime [1] 36/12 choice [2] 12/10 12/11 Chow [1] 27/3 Chris [6] 5/12 5/14 5/18 9/3 44/3 49/13 CHRISTOPHER [7] 1/14 3/8 4/4 5/1 5/10 51/6 52/3 CHRISTOPHERSON [1] 2/8 CINDY [11] 1/8 9/12 12/23 14/3 14/8 14/9 18/3 18/8 22/19 34/18 41/23 Cindy's [1] 23/1 circumstance [1] 40/14 circumstances [1] 31/17 citizens [1] 9/11 city [37] 1/6 1/6 1/20 1/20 1/21 2/9 2/10 9/5 9/5 11/14 15/8 15/16 20/7 30/12 30/15 30/18 30/20 30/23 31/2 31/22 34/8 34/15 34/16 40/4 40/9 40/14 45/24 46/11 46/13 46/14 46/24 47/2 47/6 47/8 48/3 52/2 52/2 city's [1] 46/18 city.org [2] 2/11 2/12 Civil [1] 4/18 classified [1] 44/5 close [1] 24/1 Club [2] 23/7 23/7 coat [2] 25/3 25/5 code [3] 31/20 40/24 45/24 collection [1] 24/8 collectively [2] 17/5 17/7 collie [2] 21/16 24/6 color [6] 24/24 25/1 26/14 26/24 27/1 27/2 come [16] 7/10 11/11 11/13 14/9 14/17 14/19 14/25 30/2 30/14 30/17 31/11 38/7 39/18 40/20 41/16 43/14 comes [3] 21/15 26/13 37/19 coming [2] 12/22 24/10 COMMENCED [1] 1/23 comments [1] 49/24 commission [1] 51/4 commissioned [1] 51/3 company [5] 9/8 9/8 9/9 14/4 14/5 complete [2] 8/15 8/25 concluded [2] 1/24 50/7 conditions [2] 8/8 8/14 conferences [1] 10/12 confirm [2] 9/14 41/25 confirmation [2] 16/21 16/22 consider [2] 24/18 38/10 continue [1] 21/2 contract [1] 9/5 control [25] 9/6 10/19 11/9 11/10 11/19 11/21 12/4 13/23 14/11 14/18 16/18 20/17 20/20 20/23 21/5 21/6 22/14 23/4 24/13 30/4 39/3 40/21 41/14 43/11 44/6 control's [1] 39/13 conversation [1] 5/22 conversations [1] 34/22 copies [2] 23/11 23/14</p>	<p>copy [3] 4/25 46/17 46/23 copy/paste [1] 46/23 correct [7] 9/20 13/21 22/24 22/24 44/9 44/10 44/14 corrections [1] 49/23 could [3] 16/5 24/1 42/14 couldn't [1] 15/16 council [1] 34/15 counsel [1] 51/11 County [1] 52/19 couple [3] 10/2 43/22 43/23 couple-minute [1] 43/23 courses [3] 13/14 13/18 13/18 court [2] 1/1 4/21 CRC [1] 51/2 CRR [1] 51/2 Cruise [1] 49/2 CSR [1] 51/2 current [2] 33/19 37/2 CURRENTLY [1] 52/5 customer [2] 11/8 13/17 customer-service-related [1] 13/17 cut [4] 17/23 17/25 18/4 48/24 cv [1] 1/3</p>
<p>C</p> <p>C-h-r-i-s-t-o-p-h-e-r [1] 5/11 C23 [1] 41/18 cage [1] 45/5 CALEB [1] 2/8 California [1] 2/4 call [8] 5/12 5/15 13/22 16/15 30/10 40/4 41/17 43/15 calls [1] 42/10 Cambridge [1] 10/3 came [1] 23/11 camera [1] 48/4 can't [3] 18/9 18/15 48/18 cannot [1] 45/21 capacity [3] 1/7 1/8 10/25 Captioner [1] 4/8 card [10] 14/18 19/5 41/14 41/18 42/9 42/10 42/15 44/19 44/25 48/4 Cardiff [1] 10/1 cards [1] 41/25 case [7] 1/3 8/1 20/11 32/3 34/5 40/10 52/2 cases [2] 30/25 33/8 catching [1] 11/23 cats [1] 9/18 cautioned [1] 5/2 cchristopherson [1] 2/12 certain [7] 28/13 32/16 32/23 33/20 33/21 36/24 37/14 certainly [1] 36/2 Certificate [1] 3/4 certifications [1] 10/9 certified [4] 4/6 4/7 4/7 5/3 certify [1] 51/5 challenge [1] 44/12 change [3] 37/6 39/12 52/6</p>	<p>D</p> <p>damage [1] 33/3 dangerous [5] 32/24 35/10 35/17 46/13 47/3 DATE [1] 1/19 day [6] 26/3 26/3 43/14 43/14 51/16 52/21 day-to-day [1] 43/14 days [1] 30/15 deal [2] 11/10 49/1 dealing [2] 9/11 11/16 debate [2] 17/21 17/24 decades [1] 37/3 decide [2] 17/5 17/7 decides [1] 40/22 decision [7] 18/4 18/9 18/12 31/12 31/15 44/12 45/8 decision-maker [1] 18/12 decisions [1] 22/22 deemed [1] 43/2 Defendants [2] 1/9 2/7 defined [3] 47/2 47/6 47/9 defines [1] 46/13 definition [5] 17/8 18/16 29/13 40/23 46/22 definitions [2] 46/6 46/7 delivered [1] 4/13 department [4] 21/23 36/7 36/9 39/4 depending [1] 7/15 depends [1] 27/24 DEPONENT'S [1] 52/17 deposition [13] 1/13 3/5 4/4 4/10 4/12 4/25 5/18 47/12 49/20 50/7 51/9 52/1 52/4 describe [1] 14/1 describing [2] 29/10 47/2 description [2] 9/10 44/23 designated [1] 22/20 desk [1] 9/11 determination [16] 15/3 16/13 21/9 24/3 30/3 30/3 30/5 30/6 31/18 39/4 39/6 39/13 42/22 44/4 44/14 45/1 determinative [1] 28/12 determine [3] 21/8 27/22 37/7 determined [1] 32/13 determining [7] 15/21 15/21 16/24 24/18 29/9 37/5 43/2 did [7] 23/19 47/11 47/14 47/19 48/9</p>	

<p>D</p> <p>did... [2] 49/2 49/16</p> <p>different [12] 19/7 27/20 27/22 33/25 34/1 34/11 42/6 42/14 42/18 46/6 46/7 46/22</p> <p>Direct [2] 3/9 5/6</p> <p>disagreement [2] 45/18 45/19</p> <p>disagreements [1] 45/16</p> <p>discharging [1] 34/13</p> <p>discretion [1] 40/20</p> <p>discuss [1] 49/14</p> <p>discussion [1] 44/7</p> <p>displays [1] 33/16</p> <p>disproportionate [1] 35/3</p> <p>dispute [1] 31/6</p> <p>disputes [1] 31/3</p> <p>distressed [1] 42/24</p> <p>DISTRICT [2] 1/1 1/1</p> <p>DIVISION [2] 1/2 1/20</p> <p>DNA [8] 27/18 37/13 37/22 37/24 38/3 38/5 38/6 38/9</p> <p>do [62]</p> <p>Doberman [1] 21/12</p> <p>document [1] 42/19</p> <p>documents [1] 47/14</p> <p>does [13] 15/2 17/4 17/7 17/10 17/21 19/8 26/10 30/14 40/20 40/23 42/17 42/25 44/17</p> <p>doesn't [4] 15/18 26/2 26/3 38/6</p> <p>dog [74]</p> <p>dog's [6] 15/22 33/17 37/7 39/14 39/14 43/8</p> <p>dogs [29] 9/18 11/1 11/3 15/6 16/5 16/24 17/12 18/22 19/1 19/13 19/19 20/2 21/21 23/2 23/24 24/10 24/14 25/14 25/15 25/16 25/16 33/2 33/23 33/25 35/4 35/9 35/17 37/4 41/11</p> <p>dogs' [1] 48/23</p> <p>don't [22] 7/3 7/4 7/11 11/8 20/8 20/24 22/6 23/1 27/11 30/23 32/18 32/19 32/20 33/18 33/24 36/6 40/17 43/18 43/20 46/18 47/20 48/3</p> <p>done [4] 13/14 43/22 46/24 49/9</p> <p>doubt [2] 16/15 16/18</p> <p>Douglas [1] 1/21</p> <p>down [8] 16/6 25/25 39/2 40/20 41/3 42/15 42/21 44/25</p> <p>dried [3] 17/23 18/1 18/5</p> <p>drink [1] 8/25</p> <p>drive [1] 48/6</p> <p>duly [3] 5/2 51/2 51/7</p> <p>during [3] 5/12 7/15 43/14</p> <p>duties [3] 11/21 11/22 43/14</p> <p>duty [1] 8/3</p>	<p>enforced [1] 38/1</p> <p>enforcement [4] 22/8 34/3 34/10 41/23</p> <p>enforcing [1] 23/20</p> <p>enough [2] 18/17 18/17</p> <p>entirely [1] 35/1</p> <p>Equally [1] 28/21</p> <p>err [1] 18/5</p> <p>ESQ [3] 2/3 2/8 2/8</p> <p>essentially [2] 29/19 39/3</p> <p>estimate [1] 18/24</p> <p>et [1] 52/2</p> <p>even [3] 37/10 37/24 38/6</p> <p>event [1] 51/13</p> <p>ever [17] 5/18 10/23 11/19 11/25 12/7 14/13 14/15 21/7 21/18 23/3 26/22 27/18 31/11 31/17 31/24 40/6 45/21</p> <p>every [2] 28/2 44/24</p> <p>everything [1] 49/20</p> <p>exactly [1] 11/7</p> <p>Examination [2] 3/9 5/6</p> <p>examined [1] 5/3</p> <p>examples [1] 32/12</p> <p>except [1] 4/15</p> <p>exception [1] 32/7</p> <p>excuse [1] 11/14</p> <p>experience [11] 12/15 13/1 13/10 18/18 22/20 22/22 33/15 33/19 35/18 36/1 37/4</p> <p>expertise [2] 12/2 12/6</p> <p>Eye [1] 26/14</p>	<p>full [1] 12/24</p> <p>fully [3] 6/14 7/4 7/4</p> <p>functions [1] 11/7</p> <p>further [1] 45/1</p>
<p>E</p> <p>E-mail [3] 2/5 2/11 2/12</p> <p>each [3] 6/22 24/16 46/22</p> <p>Ear [2] 26/16 26/18</p> <p>earlier [5] 34/12 35/9 36/18 44/11 47/23</p> <p>ears [1] 28/5</p> <p>education [3] 9/21 9/22 13/14</p> <p>effective [1] 36/1</p> <p>efficacy [1] 34/24</p> <p>either [5] 11/11 19/21 19/21 43/5 51/12</p> <p>elements [1] 4/17</p> <p>else [8] 7/19 13/15 15/21 15/24 28/9 28/17 38/25 39/17</p> <p>emotional [2] 8/7 8/13</p> <p>enacted [2] 23/15 23/20</p> <p>enforce [2] 35/19 43/12</p>	<p>F</p> <p>facility [4] 11/24 30/6 37/19 44/8</p> <p>factors [1] 38/12</p> <p>fair [5] 7/13 13/1 13/8 13/25 24/22</p> <p>familiar [5] 23/6 23/9 23/22 29/16 45/23</p> <p>far [2] 22/6 34/22</p> <p>fat [2] 25/14 25/17</p> <p>Fax [2] 2/5 2/11</p> <p>features [1] 33/15</p> <p>Federal [1] 4/17</p> <p>feel [2] 5/15 48/3</p> <p>fees [3] 11/14 31/1 42/16</p> <p>few [1] 30/10</p> <p>field [3] 20/21 30/4 44/7</p> <p>figured [1] 43/8</p> <p>file [4] 20/10 20/14 30/17 47/16</p> <p>fill [1] 44/19</p> <p>fills [2] 41/11 41/14</p> <p>final [5] 18/4 18/4 39/5 39/7 40/15</p> <p>fine [1] 31/1</p> <p>finish [1] 7/20</p> <p>finished [2] 9/22 9/23</p> <p>first [6] 5/2 5/16 7/20 12/10 34/24 51/7</p> <p>fit [1] 40/23</p> <p>fits [4] 17/8 18/16 29/11 29/12</p> <p>follow [3] 15/17 41/18 49/10</p> <p>follow-up [2] 15/17 49/10</p> <p>following [1] 52/4</p> <p>follows [1] 5/3</p> <p>food [1] 7/17</p> <p>foregoing [2] 51/9 52/21</p> <p>form [3] 4/15 43/6 48/3</p> <p>forms [3] 20/7 30/16 37/22</p> <p>forth [2] 4/9 4/19</p> <p>forward [2] 30/14 39/19</p> <p>found [2] 11/12 20/7</p> <p>foundation [1] 4/16</p> <p>four [1] 12/19</p> <p>free [2] 5/15 48/14</p> <p>front [2] 9/10 14/22</p> <p>Frost [1] 32/2</p>	<p>G</p> <p>gait [1] 27/8</p> <p>gather [2] 6/3 6/7</p> <p>general [6] 4/8 19/1 26/3 27/25 51/3 52/24</p> <p>German [4] 11/5 16/6 21/12 26/2</p> <p>get [14] 7/16 11/8 15/1 15/2 18/3 19/8 24/1 30/19 33/2 33/2 35/14 43/8 43/16 48/13</p> <p>gets [2] 40/22 43/15</p> <p>getting [4] 12/20 14/14 35/15 48/24</p> <p>give [2] 5/23 8/14</p> <p>given [4] 20/17 20/19 22/12 43/11</p> <p>giving [1] 6/17</p> <p>glasses [1] 46/19</p> <p>go [21] 5/21 10/23 14/25 18/21 19/13 20/23 20/24 22/5 24/11 28/15 29/14 31/20 32/13 36/9 39/16 40/24 43/12 43/16 45/4 49/16 49/22</p> <p>goes [4] 15/21 15/24 34/12 44/25</p> <p>going [20] 5/22 6/5 10/6 16/2 22/5 22/25 24/11 29/1 30/2 32/19 33/4 34/21 34/22 35/15 36/11 36/23 37/25 38/4 40/18 41/7</p> <p>good [5] 15/8 16/14 35/24 48/21 49/16</p> <p>got [13] 12/23 15/8 22/16 27/3 27/3 29/3 29/12 29/14 33/13 33/13 42/8 49/6 49/10</p> <p>grab [1] 7/17</p> <p>great [1] 38/18</p> <p>group [13] 16/12 16/23 17/5 17/7 17/20 17/21 18/9 18/15 24/13 30/5 43/7 45/8 45/11</p> <p>guessing [1] 27/11</p> <p>Guidance [1] 50/5</p> <p>guys [6] 19/17 27/18 43/18 43/21 47/21 49/14</p>
		<p>H</p> <p>half [1] 12/21</p> <p>Hall [1] 1/20</p> <p>hand [1] 51/15</p> <p>handled [2] 9/17 9/18</p> <p>hands [2] 13/10 42/19</p> <p>hands-on [1] 13/10</p> <p>handwriting [1] 42/6</p> <p>hanging [2] 12/23 14/22</p> <p>Hannah [4] 9/4 9/7 14/1 23/19</p> <p>happened [1] 35/2</p> <p>happens [3] 30/7 31/3 45/18</p> <p>happy [1] 46/12</p> <p>hard [1] 48/6</p> <p>has [28] 13/5 16/18 18/8 19/3 22/17 30/6 31/8 31/18 31/18 32/12 36/1 36/2 36/7 37/20 38/20 39/21 40/9 40/15 40/23 40/24 45/2 45/21 46/24 47/2 47/6 47/8 48/5 49/20</p> <p>HASAN [3] 2/3 3/9 4/13</p> <p>hasn't [1] 20/5</p> <p>have [80]</p> <p>haven't [1] 40/19</p> <p>He'll [1] 50/6</p> <p>he/she [1] 52/4</p> <p>head [15] 6/18 19/8 26/6 26/8 28/2 28/4 28/8 28/10 28/13 28/15 28/19 29/3 29/12 41/3 46/3</p> <p>health [2] 36/7 36/9</p> <p>hearing [1] 40/3</p>

<p>H</p> <p>height [1] 28/11 help [1] 18/21 here [7] 5/25 7/23 12/18 45/2 49/14 49/19 52/24 hereby [1] 51/5 herein [2] 51/10 52/4 hereinafter [1] 5/3 hereof [1] 4/9 hereto [1] 4/3 hereunto [1] 51/14 herself [1] 15/6 hey [5] 19/8 38/13 39/19 42/25 44/20 hierarchy [2] 14/1 14/3 high [3] 9/23 9/24 47/6 high-risk [1] 47/6 hips [1] 25/25 his [2] 1/7 52/4 his/her [1] 52/4 history [3] 9/21 12/14 38/17 hit [1] 43/16 hold [1] 36/23 home [8] 12/16 13/18 14/25 22/5 22/5 31/20 32/5 32/14 honestly [2] 40/9 48/3 how [29] 11/24 13/11 15/2 17/4 17/10 17/21 17/25 18/20 20/20 21/9 23/9 24/3 25/1 25/7 25/18 26/4 26/12 26/20 27/6 27/8 27/11 27/13 27/21 34/24 37/7 37/13 40/1 44/17 45/16 huh [13] 5/17 6/17 6/17 7/22 7/22 10/7 24/15 24/23 32/4 36/10 36/21 37/17 45/25 huh-uh [1] 6/17 Humane [1] 10/21 hundreds [4] 24/9 24/10 47/17 47/18 hungry [1] 7/16 Husch [1] 2/3 huschblackwell.com [1] 2/5 hypothetical [1] 29/10</p>	<p>information [3] 6/3 6/7 42/22 initial [5] 32/3 42/9 44/4 44/12 44/13 instead [1] 6/17 instruction [2] 20/17 20/19 instructions [3] 43/9 43/11 43/13 instructs [1] 8/4 instrument [1] 52/21 intensified [2] 13/5 13/7 intentionally [1] 45/14 interested [1] 51/12 interrupt [1] 6/24 into [15] 9/23 15/1 15/2 15/15 15/21 15/24 17/8 18/16 18/18 20/24 26/13 30/23 34/12 37/19 38/7 involved [8] 11/9 17/17 34/3 34/6 34/7 40/6 40/12 40/19 IOWA [3] 1/1 1/7 1/21 is [124] isn't [1] 38/13 it [99] it's [47] 5/22 5/22 5/24 5/25 6/7 7/16 13/10 14/13 16/4 17/1 17/1 17/23 17/24 21/10 21/25 22/3 22/4 24/9 24/25 27/8 27/12 28/2 28/2 28/6 29/1 30/20 31/19 34/21 35/9 35/24 37/8 37/11 37/21 37/24 38/7 38/7 38/14 38/18 38/25 39/7 40/16 41/1 41/21 42/18 43/15 44/22 45/14 its [1] 37/22</p>	<p>leaves [1] 31/2 Legal [1] 1/20 legs [1] 26/4 length [5] 25/5 25/9 26/4 26/10 28/5 less [1] 36/4 let's [6] 15/2 19/2 19/23 19/23 37/14 37/15 licenses [1] 11/14 Lincoln [1] 51/16 line [2] 7/20 52/6 list [2] 24/16 43/16 listed [1] 27/20 lists [1] 46/6 litigant [1] 32/3 little [6] 10/5 12/16 17/18 30/1 38/25 39/17 live [2] 15/18 31/22 lived [1] 10/5 living [2] 9/3 30/18 LLP [1] 2/3 LOCATION [1] 1/20 lodge [1] 7/24 long [5] 8/2 20/5 28/15 34/21 39/16 look [11] 15/9 19/9 24/24 26/22 27/8 27/11 29/21 33/20 46/13 46/14 49/22 looked [2] 41/20 41/22 looking [4] 17/14 23/13 29/11 30/11 looks [6] 17/20 21/11 21/12 21/13 24/5 39/5 lot [9] 15/25 16/19 17/23 22/25 30/8 33/23 41/25 42/5 48/4 love [1] 8/6 LRR [1] 1/3</p>
<p>I</p> <p>I'd [1] 8/24 IA [1] 2/10 id [1] 18/21 idea [4] 29/20 35/24 35/25 49/6 identification [19] 11/25 14/16 14/21 15/6 17/2 17/4 19/14 20/24 22/23 23/2 29/17 30/10 36/13 36/20 37/23 40/22 41/2 43/8 48/17 identifications [1] 30/19 identify [2] 16/6 20/20 identifying [4] 12/5 18/21 19/2 37/4 II [1] 49/3 important [7] 24/25 25/13 26/5 26/19 28/19 28/21 29/8 Impossible [1] 49/3 impound [10] 11/14 14/18 31/1 41/14 41/25 42/10 42/16 44/18 44/19 44/25 impounded [2] 19/3 41/13 in [82] Inc [2] 14/2 23/19 include [1] 26/10 included [1] 7/17 Incorporated [2] 9/4 9/7 incorrect [1] 37/5 indication [1] 15/9 indicator [1] 37/12 indicators [1] 28/7 individual [3] 1/3 31/18 37/3 individual's [1] 29/21 individuals [1] 22/21</p>	<p>J</p> <p>J-o-h-n [1] 5/11 Jake [1] 32/7 jam [1] 30/24 January [2] 1/19 51/16 jaws [1] 26/22 Jennifer [1] 32/2 Jess [2] 22/17 43/5 job [6] 10/12 10/15 11/7 46/17 46/23 49/16 John [1] 5/11 Julie [4] 4/5 5/24 49/20 51/2 Julie's [1] 6/22 JUSTIN [1] 2/8 ivondrak [1] 2/11</p>	<p>M</p> <p>made [4] 30/6 31/19 32/7 44/6 mail [3] 2/5 2/11 2/12 main [1] 48/16 mainly [1] 9/10 majority [2] 30/8 30/25 make [10] 9/14 14/14 16/12 18/3 18/9 21/9 24/3 28/24 47/23 52/4 maker [1] 18/12 makes [5] 14/18 15/5 25/18 39/4 40/4 making [2] 16/15 22/22 Man [1] 22/25 manager [3] 40/4 40/10 40/15 many [1] 33/8 marriage [1] 23/18 married [3] 12/20 12/20 12/23 Mars [1] 34/8 mass [3] 25/19 28/1 28/10 match [1] 45/6 matches [1] 39/22 materials [1] 21/18 may [13] 4/5 4/22 7/19 7/24 7/25 12/8 12/11 16/5 35/5 41/16 42/4 42/16 46/25 maybe [4] 7/3 13/24 19/7 48/15 meaning [1] 28/13 meant [1] 34/25 mechanism [1] 34/11 medication [1] 8/19 meetings [1] 10/17 members [4] 17/21 21/22 34/15 34/16 mental [2] 8/7 8/14 mention [1] 7/5 mentioned [7] 9/17 11/3 11/18 19/17 28/8 35/11 36/18 microchip [4] 42/16 45/6 48/16 48/24 microchipped [1] 30/20 microchips [1] 48/23 might [5] 19/4 19/6 22/3 22/4 24/5</p>
	<p>K</p> <p>KALI [3] 1/3 34/4 47/16 KAMRON [4] 2/3 4/13 5/15 5/16 kamron.hasan [1] 2/5 keep [2] 20/1 23/13 keeping [1] 48/4 Kenna [3] 15/11 22/17 43/5 kennel [3] 19/5 23/6 23/7 kept [2] 20/9 20/9 key [1] 28/7 kind [12] 5/21 11/15 14/25 20/18 21/1 23/12 24/19 28/11 30/1 30/11 42/13 49/1 kingdom [1] 10/8 knew [1] 23/12 knowing [1] 24/4</p>	
	<p>L</p> <p>lab [3] 21/16 21/16 24/6 lab-collie [1] 21/16 ladder [1] 12/12 last [3] 12/21 34/19 49/17 late [2] 20/4 30/21 lawful [1] 5/2 lawsuit [2] 6/4 6/4 Le [1] 34/8 learning [1] 13/8</p>	

<p>M</p> <p>mind [1] 39/13</p> <p>minute [2] 35/16 43/23</p> <p>minutes [1] 43/22</p> <p>missing [2] 42/11 42/25</p> <p>Mission [1] 49/2</p> <p>mix [1] 21/16</p> <p>mixed [7] 23/23 23/25 24/2 24/20 29/22 38/14 39/20</p> <p>mixed-breed [2] 23/23 24/20</p> <p>mixes [1] 15/15</p> <p>month [3] 12/19 24/10 47/18</p> <p>more [10] 9/17 9/18 12/2 13/17 14/21 30/2 32/16 32/23 35/10 46/2</p> <p>most [2] 28/19 29/7</p> <p>moved [1] 15/15</p> <p>MR [5] 2/3 2/8 2/8 3/9 4/13</p> <p>much [4] 17/11 29/2 48/4 49/8</p> <p>multiple [1] 42/5</p> <p>municipal [1] 45/24</p> <p>muscle [2] 25/18 28/1</p> <p>muzzle [2] 26/12 28/5</p> <p>MYERS [3] 1/3 34/4 52/2</p> <p>Myers' [1] 47/16</p> <p>myself [2] 43/5 47/17</p>	<p>office [4] 14/20 14/22 42/12 42/17</p> <p>officer [9] 14/18 16/18 19/6 21/6 30/4 41/14 42/1 44/6 44/18</p> <p>officer's [3] 21/5 44/12 44/14</p> <p>officers [11] 12/4 14/11 16/14 20/18 20/20 22/14 23/4 40/21 41/21 42/8 43/12</p> <p>official [2] 1/7 1/8</p> <p>officially [1] 51/15</p> <p>offspring [1] 38/23</p> <p>often [2] 18/20 45/16</p> <p>oh [4] 10/4 15/25 21/16 49/4</p> <p>okay [57]</p> <p>old [1] 11/2</p> <p>Omaha [1] 2/4</p> <p>on [57]</p> <p>once [4] 11/24 23/20 30/8 48/5</p> <p>only [8] 14/4 16/17 26/1 31/24 32/9 32/10 39/12 43/4</p> <p>opinion [9] 16/16 16/17 32/16 32/23 33/20 37/7 45/10 45/11 45/12</p> <p>opposed [2] 35/15 35/20</p> <p>option [1] 49/22</p> <p>ordinance [3] 15/8 15/13 22/2</p> <p>ordinances [1] 46/15</p> <p>organizational [1] 10/17</p> <p>organizations [1] 22/19</p> <p>original [1] 4/12</p> <p>others [2] 32/17 32/24</p> <p>otherwise [1] 51/12</p> <p>ourself [1] 23/12</p> <p>out [23] 12/23 14/18 15/3 20/4 20/6 20/21 22/18 30/4 30/20 34/8 38/14 40/2 41/11 41/14 42/9 42/9 43/8 43/12 44/6 44/19 47/16 48/2 48/25</p> <p>outcome [1] 28/12</p> <p>outside [2] 4/23 30/18</p> <p>outwardly [1] 33/16</p> <p>over [8] 5/21 6/22 10/2 12/22 13/5 24/11 34/19 46/12</p> <p>overall [4] 25/11 26/8 28/11 36/5</p> <p>overturned [1] 41/9</p> <p>overweight [1] 25/16</p> <p>own [3] 16/8 21/5 22/17</p> <p>owner [10] 15/6 18/6 22/3 30/14 31/3 38/9 38/12 39/18 39/21 42/24</p> <p>owner's [1] 42/12</p> <p>owners [1] 31/11</p>	<p>people [18] 11/11 11/13 14/7 14/8 15/5 16/12 18/17 22/7 22/13 30/10 30/23 33/9 42/21 43/6 47/18 48/22 49/7 49/7</p> <p>percent [9] 11/17 37/5 37/14 37/16 37/18 37/25 41/15 41/15 41/18</p> <p>perform [1] 11/20</p> <p>performs [1] 9/5</p> <p>periods [1] 12/19</p> <p>person [6] 22/3 31/21 42/17 42/23 43/1 43/4</p> <p>personally [7] 10/10 11/20 23/3 23/5 26/23 40/8 40/12</p> <p>phone [4] 42/13 42/24 43/1 43/5</p> <p>photograph [2] 36/14 36/15</p> <p>photographs [2] 30/22 47/24</p> <p>phrased [2] 7/3 8/1</p> <p>physical [11] 8/7 8/13 9/9 13/24 13/25 17/13 24/11 29/21 33/15 36/23 39/24</p> <p>pick [1] 21/17</p> <p>picked [6] 16/8 32/12 37/8 39/11 42/2 42/11</p> <p>picking [2] 34/6 34/13</p> <p>pictures [13] 19/5 19/17 20/1 20/3 20/8 20/13 20/15 36/17 48/1 48/1 48/10 48/14 48/20</p> <p>pieces [1] 46/21</p> <p>pinned [1] 20/10</p> <p>pinning [1] 20/6</p> <p>pit [62]</p> <p>pit-bull-type [1] 35/4</p> <p>place [2] 4/9 51/10</p> <p>plaintiff [4] 1/4 2/2 4/14 34/4</p> <p>play [1] 15/3</p> <p>plays [1] 40/2</p> <p>plead [1] 30/22</p> <p>please [4] 5/8 14/1 30/23 50/5</p> <p>point [8] 29/3 30/17 30/21 39/9 39/12 40/18 42/12 48/4</p> <p>policy [1] 48/9</p> <p>poorly [1] 7/25</p> <p>position [2] 9/8 33/20</p> <p>poundmaster [1] 45/20</p> <p>predictive [1] 33/17</p> <p>predominant [6] 24/19 27/21 27/23 29/23 36/22 37/6</p> <p>predominantly [1] 31/19</p> <p>preexisting [1] 45/7</p> <p>prepare [3] 6/7 47/11 47/19</p> <p>presence [1] 4/23</p> <p>present [2] 38/9 38/11</p> <p>resident [3] 9/9 14/3 14/4</p> <p>pretty [3] 17/11 24/1 29/2</p> <p>previously [1] 45/2</p> <p>primarily [1] 40/25</p> <p>primary [3] 14/9 37/12 37/12</p> <p>print [2] 20/4 20/13</p> <p>printed [3] 20/9 21/18 48/2</p> <p>printing [2] 23/11 23/13</p> <p>prior [2] 12/20 38/16</p> <p>probably [4] 7/2 24/1 34/19 49/5</p> <p>problem [1] 22/5</p> <p>procedure [2] 4/18 16/23</p> <p>process [7] 5/21 15/3 16/23 17/17 17/19 34/12 40/1</p> <p>Professional [1] 4/6</p> <p>prohibited [3] 15/7 22/2 44/5</p> <p>proof [1] 39/14</p> <p>proper [2] 33/10 33/11</p> <p>provide [1] 23/3</p> <p>provided [1] 49/24</p> <p>public [3] 4/8 11/16 52/24</p> <p>pulled [3] 18/3 24/12 47/16</p> <p>purpose [1] 6/3</p>
<p>N</p> <p>name [8] 5/9 5/10 5/15 5/16 22/11 42/1 42/4 42/13</p> <p>National [3] 10/19 20/23 24/12</p> <p>NE [1] 2/4</p> <p>Nebraska [2] 51/5 51/16</p> <p>nec [1] 25/12</p> <p>necessarily [5] 25/12 26/15 27/16 35/13 35/13</p> <p>neck [1] 26/20</p> <p>need [7] 4/20 6/16 6/21 7/15 7/18 20/14 46/14</p> <p>needed [1] 23/14</p> <p>net [1] 48/13</p> <p>never [5] 11/10 11/20 30/9 32/11 33/8</p> <p>New [1] 32/7</p> <p>next [1] 27/12</p> <p>nice [1] 49/9</p> <p>nipping [1] 33/9</p> <p>nods [2] 6/18 41/3</p> <p>non [1] 37/25</p> <p>non-banned [1] 37/25</p> <p>nope [2] 34/14 37/24</p> <p>normal [1] 43/14</p> <p>normally [3] 38/18 38/25 45/13</p> <p>NORTHERN [1] 1/1</p> <p>notarial [2] 51/4 51/15</p> <p>Notary [2] 4/8 52/24</p> <p>nothing [4] 11/23 13/16 19/10 51/8</p> <p>notice [2] 4/11 41/25</p> <p>now [5] 7/16 15/2 38/19 47/24 48/12</p> <p>number [6] 22/7 22/13 35/3 36/2 36/5 42/13</p> <p>numbers [3] 36/7 36/8 45/6</p> <p>numerous [1] 13/17</p>	<p>P</p> <p>p.m [4] 1/24 44/1 44/1 50/7</p> <p>P.O [1] 2/10</p> <p>PADMORE [1] 1/7</p> <p>page [5] 3/5 4/9 33/14 44/21 52/6</p> <p>paper [2] 12/2 46/21</p> <p>paperwork [10] 20/6 34/7 38/21 39/1 39/2 39/21 41/4 41/11 45/3 45/7</p> <p>parentage [1] 39/15</p> <p>parents [3] 10/5 38/24 41/5</p> <p>parents' [1] 38/20</p> <p>part [3] 15/20 24/6 24/6</p> <p>particular [1] 24/5</p> <p>particularly [1] 16/5</p> <p>parties [1] 4/3</p> <p>parts [1] 28/23</p> <p>party [1] 51/12</p> <p>pass [2] 46/12 46/16</p> <p>passed [1] 46/21</p> <p>paste [2] 46/17 46/23</p> <p>pattern [1] 25/1</p> <p>pay [1] 31/1</p> <p>Pell [2] 4/5 51/2</p> <p>pen [1] 12/2</p>	
<p>O</p> <p>oath [5] 5/4 5/25 6/1 6/11 6/13</p> <p>objections [2] 4/15 7/24</p> <p>observed [1] 17/19</p> <p>obviously [3] 29/7 33/2 46/4</p> <p>occasionally [7] 12/9 24/25 25/4 36/12 41/16 42/15 48/12</p> <p>occurred [2] 31/2 35/4</p> <p>off [8] 20/9 23/11 23/13 24/17 27/20 34/25 46/3 46/18</p>		

<p>P</p> <p>purposes [1] 19/11 pursuant [1] 4/10 push [1] 22/6 pusher [1] 12/2 put [3] 18/24 31/8 41/17 puts [2] 30/24 39/2 putting [1] 19/11</p>	<p>right [33] 5/12 6/25 7/3 7/16 10/2 11/20 13/10 14/15 15/2 15/23 16/9 16/11 17/2 17/3 18/7 19/16 29/9 31/14 39/7 39/22 39/25 41/6 41/8 41/10 42/20 42/20 44/15 48/1 49/13 49/18 50/2 50/3 50/4 risk [1] 47/6 road [1] 16/6 ROBERT [1] 1/7 role [1] 9/7 room [1] 7/23</p>	<p>sign-out [2] 20/6 48/2 sign-up [1] 30/16 signature [2] 4/24 52/17 signed [1] 30/20 signing [1] 34/8 since [4] 12/16 23/1 37/14 40/18 sioux [11] 1/6 1/20 1/21 2/10 2/11 2/12 9/5 15/16 31/22 45/24 52/2 sioux-city.org [2] 2/11 2/12 sister [1] 10/3 situation [3] 18/19 19/4 31/24 situations [1] 17/25 six [1] 12/18 Sixth [1] 2/9 size [8] 17/12 25/21 26/8 26/18 27/6 28/18 28/21 28/23 skinny [1] 25/15 slip [1] 48/13</p>
<p>Q</p> <p>qualified [2] 14/21 51/3 question [12] 7/5 7/13 7/21 7/25 8/2 8/3 8/25 14/15 15/17 27/13 44/13 47/5 questioning [1] 7/20 questions [9] 5/22 5/23 7/2 7/24 8/6 8/9 8/20 44/22 49/22 quicker [1] 22/25</p>	<p>Rotweiler [4] 21/11 33/3 35/14 35/21 Rottweilers [2] 35/11 35/11 RPR [1] 51/2 Rule [1] 4/18 rules [2] 4/18 49/19 run [1] 18/18 rushing [1] 41/17</p>	<p>smoother [1] 49/8 sneaking [1] 8/24 solemnly [1] 5/2 somebody [6] 18/2 18/2 30/18 31/5 42/10 45/10 something [10] 12/5 18/4 19/7 19/7 21/15 23/10 23/25 38/7 42/4 48/11 sometimes [1] 44/7 somewhere [1] 48/16 soon [1] 23/10 Sorry [1] 26/25 sort [6] 13/17 19/10 20/25 22/6 43/6 48/13 speak [1] 47/19 special [1] 32/7 specific [7] 10/14 22/7 22/12 24/17 28/23 34/22 43/13 specifically [3] 10/18 33/24 35/18 specifics [2] 20/25 36/24 specified [1] 51/10 speed [1] 36/19 spell [1] 5/8 staff [3] 12/5 14/20 42/12 Staffordshire [1] 37/16 standard [1] 16/23 standards [6] 15/4 21/19 21/23 23/7 23/11 39/23 start [3] 19/23 19/23 48/10 started [5] 12/24 13/2 20/5 48/20 48/22 state [4] 5/8 37/2 51/4 52/18 stated [1] 4/20 states [2] 1/1 52/4 statute [1] 46/6 stay [1] 40/23 still [3] 31/20 37/11 37/25 stipulated [1] 4/2 stipulations [2] 3/3 51/11 stored [1] 47/25 straight [1] 9/23 stray [1] 11/12 Street [3] 1/21 2/4 2/9 strike [2] 21/7 35/7 strong [2] 35/19 35/20 stronger [2] 33/7 35/9 structure [3] 28/18 28/22 28/24 studies [2] 36/24 38/2 stuff [3] 14/10 14/25 42/14 subject [1] 30/7 subjective [1] 40/20 submit [1] 49/25 such [2] 22/9 40/14 suddenly [1] 15/15 suggested [1] 20/13 suit [1] 51/13 Suite [3] 1/20 2/4 2/9</p>
<p>R</p> <p>rare [2] 14/14 18/10 rarely [4] 12/1 18/18 18/23 45/17 RARRAT [2] 1/8 14/3 rather [2] 13/18 13/20 reached [1] 29/5 read [3] 49/14 49/19 52/6 reading [2] 21/1 21/2 READS [1] 52/6 real [1] 30/24 really [8] 13/2 26/1 26/2 26/3 27/5 32/18 32/20 49/4 realm [1] 10/6 Realtime [2] 4/6 4/7 reason [5] 20/11 35/19 42/1 46/5 52/5 reasons [1] 35/1 Receive [1] 10/14 recess [1] 44/1 reclaim [1] 11/13 record [4] 4/21 5/9 20/9 44/3 recorded [1] 5/24 recording [1] 49/20 records [1] 41/23 reduced [2] 36/3 36/5 refer [2] 21/18 21/23 referred [1] 25/23 referring [1] 10/18 reflected [1] 46/25 refresh [1] 47/17 registered [2] 4/5 38/20 regularly [2] 47/24 48/14 related [5] 10/12 10/14 11/23 13/17 23/23 relative [1] 51/12 releasing [1] 18/5 remaining [1] 34/4 remember [1] 48/18 remove [2] 30/15 31/1 removing [1] 48/23 rephrase [2] 7/6 8/1 report [3] 14/7 14/8 14/11 reported [1] 43/15 reporter [4] 4/6 4/6 4/7 4/21 Reporter's [1] 3/4 represent [2] 46/17 46/23 required [2] 4/17 21/4 rescue [1] 22/19 rescues [1] 22/18 reserved [1] 4/16 respect [1] 16/10 response [1] 5/4 rest [1] 18/14 review [3] 47/14 50/3 50/6 revisited [1] 30/5</p>	<p>S</p> <p>sake [2] 6/22 6/22 sale [1] 11/13 same [8] 6/25 8/25 33/13 42/19 44/21 45/5 45/13 47/5 save [1] 19/18 saved [1] 48/6 saying [2] 35/17 42/24 says [3] 18/15 42/10 45/4 school [2] 9/23 9/24 science [6] 23/23 29/16 29/20 29/24 36/19 37/3 Scottie [1] 19/9 Scottish [1] 22/4 seal [2] 51/15 52/24 second [6] 16/16 16/17 45/9 45/11 45/12 48/22 secretary [2] 9/9 14/4 section [1] 45/23 see [4] 8/24 13/11 47/17 48/25 seeing [2] 24/7 24/9 seen [3] 31/5 31/8 33/23 seminars [1] 10/11 sending [1] 32/6 sense [1] 25/18 sent [1] 22/18 serious [1] 19/10 seriously [2] 31/5 31/7 service [2] 11/8 13/17 services [1] 9/6 set [4] 4/9 4/19 40/3 51/14 seven [4] 12/18 12/24 45/25 46/1 shape [3] 26/6 26/16 27/4 shareholder [2] 14/5 14/9 she [10] 5/25 9/17 9/18 11/3 15/15 15/16 15/17 32/5 32/6 52/4 she's [4] 15/8 15/20 18/11 22/18 shelter [4] 12/17 15/5 30/18 45/3 Shepherd [2] 16/6 21/13 Shepherds [2] 11/5 26/2 Shorthand [1] 4/7 should [2] 36/9 52/5 shoulders [1] 25/24 shouldn't [1] 30/13 show [6] 11/1 26/2 36/11 36/17 38/13 38/13 showed [1] 37/13 showing [2] 39/14 41/4 shows [2] 10/23 11/1 side [9] 11/9 13/20 13/22 13/23 13/24 13/25 18/5 29/5 42/15 sight [1] 21/11 sign [7] 20/6 30/16 48/2 49/15 49/19 50/4 50/6</p>	<p>smooth [1] 49/8 sneaking [1] 8/24 solemnly [1] 5/2 somebody [6] 18/2 18/2 30/18 31/5 42/10 45/10 something [10] 12/5 18/4 19/7 19/7 21/15 23/10 23/25 38/7 42/4 48/11 sometimes [1] 44/7 somewhere [1] 48/16 soon [1] 23/10 Sorry [1] 26/25 sort [6] 13/17 19/10 20/25 22/6 43/6 48/13 speak [1] 47/19 special [1] 32/7 specific [7] 10/14 22/7 22/12 24/17 28/23 34/22 43/13 specifically [3] 10/18 33/24 35/18 specifics [2] 20/25 36/24 specified [1] 51/10 speed [1] 36/19 spell [1] 5/8 staff [3] 12/5 14/20 42/12 Staffordshire [1] 37/16 standard [1] 16/23 standards [6] 15/4 21/19 21/23 23/7 23/11 39/23 start [3] 19/23 19/23 48/10 started [5] 12/24 13/2 20/5 48/20 48/22 state [4] 5/8 37/2 51/4 52/18 stated [1] 4/20 states [2] 1/1 52/4 statute [1] 46/6 stay [1] 40/23 still [3] 31/20 37/11 37/25 stipulated [1] 4/2 stipulations [2] 3/3 51/11 stored [1] 47/25 straight [1] 9/23 stray [1] 11/12 Street [3] 1/21 2/4 2/9 strike [2] 21/7 35/7 strong [2] 35/19 35/20 stronger [2] 33/7 35/9 structure [3] 28/18 28/22 28/24 studies [2] 36/24 38/2 stuff [3] 14/10 14/25 42/14 subject [1] 30/7 subjective [1] 40/20 submit [1] 49/25 such [2] 22/9 40/14 suddenly [1] 15/15 suggested [1] 20/13 suit [1] 51/13 Suite [3] 1/20 2/4 2/9</p>

<p>S</p> <p>sure [24] 5/17 6/2 6/6 6/20 7/9 7/22 8/12 8/18 9/2 14/14 20/7 21/3 23/25 35/1 36/4 40/8 40/9 40/17 42/3 43/24 46/8 46/10 46/20 47/23</p> <p>surrender [1] 11/11</p> <p>sworn [2] 5/2 51/7</p>	<p>three-month [1] 12/19</p> <p>through [9] 13/7 18/21 24/4 24/9 24/10 41/20 41/22 48/13 49/22</p> <p>time [21] 1/23 1/24 4/8 4/16 12/24 13/5 14/17 14/19 20/12 23/16 28/2 34/21 37/5 39/11 41/15 41/19 42/5 43/18 44/24 45/21 51/9</p> <p>times [3] 10/3 16/19 30/8</p> <p>title [1] 4/9</p> <p>today [2] 8/9 47/12</p> <p>together [2] 19/8 45/14</p> <p>Tom [1] 49/2</p> <p>tongue [4] 26/24 27/1 27/2 27/3</p> <p>too [2] 11/2 26/13</p> <p>top [2] 42/1 46/3</p> <p>topline [1] 25/24</p> <p>totally [1] 38/3</p> <p>touching [1] 42/19</p> <p>towards [2] 28/15 39/16</p> <p>tracks [1] 33/21</p> <p>training [6] 10/14 20/17 20/19 20/22 23/3 37/4</p> <p>traits [3] 24/8 24/12 24/17</p> <p>transcribed [2] 4/23 4/25</p> <p>transcript [3] 4/19 49/19 49/21</p> <p>trial [2] 4/16 6/8</p> <p>truck [2] 11/10 11/19</p> <p>true [1] 36/25</p> <p>trump [1] 38/5</p> <p>trust [1] 15/20</p> <p>truth [3] 51/7 51/8 51/8</p> <p>truthful [2] 8/15 8/25</p> <p>truthfully [1] 6/14</p> <p>try [2] 8/1 48/13</p> <p>turns [1] 38/14</p> <p>two [4] 15/6 29/6 43/6 48/12</p> <p>type [3] 25/7 27/6 35/4</p> <p>types [2] 33/25 42/6</p> <p>typically [5] 16/14 29/1 33/7 43/4 44/19</p>	<p>38/25 39/17 45/17 45/17</p> <p>vet [2] 39/1 48/24</p> <p>veterinarian [1] 39/2</p> <p>vice [2] 9/9 14/4</p> <p>vicious [1] 47/9</p> <p>view [4] 32/18 35/22 35/23 35/24</p> <p>visiting [1] 12/18</p> <p>visual [13] 16/1 16/25 17/1 17/4 17/11 22/23 23/22 29/17 36/20 37/11 38/4 40/21 41/1</p> <p>visually [2] 13/11 37/4</p> <p>VONDRAK [1] 2/8</p>
<p>T</p> <p>T.M [1] 2/3</p> <p>tail [2] 27/4 27/6</p> <p>take [9] 19/4 19/19 20/1 20/3 20/14 32/5 42/12 43/21 43/23</p> <p>taken [7] 4/5 4/10 5/19 37/21 44/1 47/24 51/9</p> <p>takes [1] 40/4</p> <p>taking [6] 11/14 30/22 42/21 48/10 48/20 48/24</p> <p>talk [3] 6/22 19/2 49/7</p> <p>talked [5] 34/15 34/18 44/4 47/21 48/18</p> <p>talking [8] 19/1 26/1 27/24 27/25 28/1 34/12 37/15 48/23</p> <p>team [3] 22/8 22/9 22/20</p> <p>teeth [1] 26/22</p> <p>tell [10] 18/15 21/15 21/16 22/4 24/1 24/17 29/22 31/11 36/25 51/7</p> <p>ten [5] 12/20 30/15 34/19 45/25 46/1</p> <p>tend [1] 18/5</p> <p>tendency [1] 6/23</p> <p>term [1] 25/23</p> <p>terms [3] 23/19 35/23 37/2</p> <p>terrier [3] 22/3 22/4 37/16</p> <p>test [3] 38/5 38/6 38/9</p> <p>testified [1] 5/3</p> <p>testimony [2] 4/22 51/14</p> <p>texture [1] 25/3</p> <p>than [12] 13/18 13/20 14/21 22/25 32/17 32/24 33/4 34/11 43/5 46/2 47/20 49/8</p> <p>that [235]</p> <p>them [13] 12/15 15/16 17/23 20/4 20/6 20/14 20/15 30/11 30/19 30/22 46/12 48/4 48/24</p> <p>themselves [2] 16/15 35/14</p> <p>then [21] 12/23 16/16 18/3 19/7 22/16 22/16 22/19 29/4 29/4 30/14 30/17 34/13 36/17 37/21 38/24 39/23 42/10 42/14 45/4 45/19 49/13</p> <p>there's [24] 13/16 14/20 16/21 17/23 18/17 19/10 20/16 20/18 22/5 22/9 22/12 22/19 22/20 36/4 38/18 39/17 41/4 43/9 44/11 44/13 45/8 46/5 46/24 48/3</p> <p>therefore [2] 4/20 20/25</p> <p>these [5] 8/6 16/24 17/12 22/21 27/22</p> <p>they'll [2] 14/23 16/16</p> <p>they're [7] 11/24 14/22 20/9 22/21 47/25 48/2 48/6</p> <p>thing [4] 11/15 21/1 28/20 39/12</p> <p>things [6] 21/10 21/19 29/6 29/7 35/10 46/7</p> <p>thinking [1] 35/6</p> <p>this [35] 4/19 5/13 6/3 6/4 7/15 14/14 16/12 17/17 17/19 19/8 22/25 23/12 25/23 27/12 29/10 29/10 30/1 32/3 34/5 38/13 38/19 38/23 39/4 39/19 41/23 44/21 44/21 46/16 46/17 47/1 47/11 48/19 51/13 51/16 52/21</p> <p>though [1] 19/15</p> <p>thought [2] 19/6 49/8</p> <p>three [3] 12/19 12/19 46/21</p>	<p>today [2] 8/9 47/12</p> <p>together [2] 19/8 45/14</p> <p>Tom [1] 49/2</p> <p>tongue [4] 26/24 27/1 27/2 27/3</p> <p>too [2] 11/2 26/13</p> <p>top [2] 42/1 46/3</p> <p>topline [1] 25/24</p> <p>totally [1] 38/3</p> <p>touching [1] 42/19</p> <p>towards [2] 28/15 39/16</p> <p>tracks [1] 33/21</p> <p>training [6] 10/14 20/17 20/19 20/22 23/3 37/4</p> <p>traits [3] 24/8 24/12 24/17</p> <p>transcribed [2] 4/23 4/25</p> <p>transcript [3] 4/19 49/19 49/21</p> <p>trial [2] 4/16 6/8</p> <p>truck [2] 11/10 11/19</p> <p>true [1] 36/25</p> <p>trump [1] 38/5</p> <p>trust [1] 15/20</p> <p>truth [3] 51/7 51/8 51/8</p> <p>truthful [2] 8/15 8/25</p> <p>truthfully [1] 6/14</p> <p>try [2] 8/1 48/13</p> <p>turns [1] 38/14</p> <p>two [4] 15/6 29/6 43/6 48/12</p> <p>type [3] 25/7 27/6 35/4</p> <p>types [2] 33/25 42/6</p> <p>typically [5] 16/14 29/1 33/7 43/4 44/19</p>	<p>W</p> <p>W-a-l-l [1] 5/11</p> <p>waive [2] 50/3 50/4</p> <p>waived [1] 4/25</p> <p>Wales [1] 10/1</p> <p>walking [3] 16/6 27/8 27/12</p> <p>WALL [7] 1/14 3/8 4/4 5/1 5/11 51/6 52/3</p> <p>want [11] 7/17 14/14 15/1 36/24 41/24 43/21 43/23 47/20 47/23 49/14 49/15</p> <p>wanted [2] 9/14 32/5</p> <p>wasn't [2] 23/18 34/6</p> <p>way [6] 28/13 28/15 32/21 39/16 45/15 45/15</p> <p>we'll [2] 19/7 49/13</p> <p>we're [8] 23/12 27/24 27/25 29/10 37/14 43/16 45/13 45/13</p> <p>we've [6] 12/20 20/5 22/16 22/16 33/23 42/8</p> <p>website [5] 19/5 19/12 19/13 46/18 46/25</p> <p>Wednesday [1] 1/19</p> <p>weigh [3] 12/7 14/15 27/22</p> <p>weight [2] 17/12 25/11</p> <p>went [1] 9/23</p> <p>WESTERN [1] 1/2</p> <p>what's [5] 9/7 9/21 12/14 12/14 27/21</p> <p>whatever [2] 19/9 22/4</p> <p>whatsoever [1] 11/22</p> <p>where's [1] 42/25</p> <p>WHEREOF [1] 51/14</p> <p>whether [11] 15/21 17/8 18/15 29/9 30/3 35/24 42/23 43/2 44/8 44/13 45/8</p> <p>while [1] 10/5</p> <p>who's [1] 43/1</p> <p>whole [3] 18/9 38/18 51/8</p> <p>why [3] 20/11 42/6 48/19</p> <p>width [1] 26/10</p> <p>wife [2] 9/12 11/1</p> <p>will [34] 4/12 4/19 5/8 5/21 5/23 6/13 6/23 6/24 6/24 7/2 7/5 7/11 7/12 8/1 8/8 8/11 8/14 8/17 8/20 8/22 14/1 18/3 24/16 28/4 28/15 36/17 39/12 41/25 44/18 44/19 46/16 46/16 46/23 49/21</p> <p>wishes [1] 52/4</p> <p>within [4] 4/19 9/8 51/4 51/11</p> <p>witness [7] 3/7 4/22 4/23 4/24 41/3 52/3 52/4</p> <p>Witness' [1] 5/4</p> <p>words [1] 15/14</p> <p>work [4] 9/4 9/23 17/22 44/17</p> <p>worked [2] 16/3 22/17</p> <p>working [4] 9/10 9/10 12/17 12/24</p> <p>workspace [1] 45/14</p> <p>worse [1] 33/4</p> <p>Worthwhile [1] 33/12</p> <p>would [32] 13/8 13/22 15/7 15/12 17/15 18/20 28/11 29/2 29/8 35/3 36/7 37/6 38/12 38/16 38/16 38/24 38/24 39/16 42/8 42/12 43/6 43/18 45/20</p>
<p>U</p> <p>ultimate [4] 18/8 18/11 40/4 45/20</p> <p>ultimately [4] 18/8 20/3 22/1 45/20</p> <p>under [15] 5/25 6/10 6/13 8/2 15/7 15/12 17/16 22/2 29/11 29/12 31/20 37/21 40/24 49/18 51/3</p> <p>understand [8] 6/10 7/3 7/4 7/12 8/8 8/20 33/14 41/24</p> <p>unfortunately [2] 14/23 17/15</p> <p>UNITED [2] 1/1 23/7</p> <p>unless [7] 8/3 39/9 39/18 39/21 41/4 45/2 45/7</p> <p>unofficial [1] 43/7</p> <p>unreliable [2] 38/3 39/1</p> <p>until [3] 4/16 20/12 39/11</p> <p>up [31] 14/17 14/19 15/4 15/17 16/16 16/20 20/12 21/1 21/2 21/17 30/16 31/8 32/12 34/6 34/13 36/18 37/8 39/9 39/10 39/11 39/11 40/3 41/3 41/16 41/18 42/2 42/11 44/20 45/6 49/10 49/14</p> <p>updated [1] 23/13</p> <p>us [9] 6/16 7/16 7/18 7/19 20/13 20/14 22/4 30/24 44/20</p> <p>use [3] 37/14 37/15 48/17</p> <p>used [1] 11/1</p> <p>usually [2] 12/9 14/20</p>	<p>U</p> <p>ultimate [4] 18/8 18/11 40/4 45/20</p> <p>ultimately [4] 18/8 20/3 22/1 45/20</p> <p>under [15] 5/25 6/10 6/13 8/2 15/7 15/12 17/16 22/2 29/11 29/12 31/20 37/21 40/24 49/18 51/3</p> <p>understand [8] 6/10 7/3 7/4 7/12 8/8 8/20 33/14 41/24</p> <p>unfortunately [2] 14/23 17/15</p> <p>UNITED [2] 1/1 23/7</p> <p>unless [7] 8/3 39/9 39/18 39/21 41/4 45/2 45/7</p> <p>unofficial [1] 43/7</p> <p>unreliable [2] 38/3 39/1</p> <p>until [3] 4/16 20/12 39/11</p> <p>up [31] 14/17 14/19 15/4 15/17 16/16 16/20 20/12 21/1 21/2 21/17 30/16 31/8 32/12 34/6 34/13 36/18 37/8 39/9 39/10 39/11 39/11 40/3 41/3 41/16 41/18 42/2 42/11 44/20 45/6 49/10 49/14</p> <p>updated [1] 23/13</p> <p>us [9] 6/16 7/16 7/18 7/19 20/13 20/14 22/4 30/24 44/20</p> <p>use [3] 37/14 37/15 48/17</p> <p>used [1] 11/1</p> <p>usually [2] 12/9 14/20</p>	<p>WESTERN [1] 1/2</p> <p>what's [5] 9/7 9/21 12/14 12/14 27/21</p> <p>whatever [2] 19/9 22/4</p> <p>whatsoever [1] 11/22</p> <p>where's [1] 42/25</p> <p>WHEREOF [1] 51/14</p> <p>whether [11] 15/21 17/8 18/15 29/9 30/3 35/24 42/23 43/2 44/8 44/13 45/8</p> <p>while [1] 10/5</p> <p>who's [1] 43/1</p> <p>whole [3] 18/9 38/18 51/8</p> <p>why [3] 20/11 42/6 48/19</p> <p>width [1] 26/10</p> <p>wife [2] 9/12 11/1</p> <p>will [34] 4/12 4/19 5/8 5/21 5/23 6/13 6/23 6/24 6/24 7/2 7/5 7/11 7/12 8/1 8/8 8/11 8/14 8/17 8/20 8/22 14/1 18/3 24/16 28/4 28/15 36/17 39/12 41/25 44/18 44/19 46/16 46/16 46/23 49/21</p> <p>wishes [1] 52/4</p> <p>within [4] 4/19 9/8 51/4 51/11</p> <p>witness [7] 3/7 4/22 4/23 4/24 41/3 52/3 52/4</p> <p>Witness' [1] 5/4</p> <p>words [1] 15/14</p> <p>work [4] 9/4 9/23 17/22 44/17</p> <p>worked [2] 16/3 22/17</p> <p>working [4] 9/10 9/10 12/17 12/24</p> <p>workspace [1] 45/14</p> <p>worse [1] 33/4</p> <p>Worthwhile [1] 33/12</p> <p>would [32] 13/8 13/22 15/7 15/12 17/15 18/20 28/11 29/2 29/8 35/3 36/7 37/6 38/12 38/16 38/16 38/24 38/24 39/16 42/8 42/12 43/6 43/18 45/20</p>
<p>V</p> <p>vary [1] 28/5</p> <p>verbal [1] 5/24</p> <p>very [15] 12/1 12/1 12/16 15/8 16/14 17/18 18/10 18/18 18/23 18/23 30/10</p>	<p>V</p> <p>vary [1] 28/5</p> <p>verbal [1] 5/24</p> <p>very [15] 12/1 12/1 12/16 15/8 16/14 17/18 18/10 18/18 18/23 18/23 30/10</p>	<p>W</p> <p>W-a-l-l [1] 5/11</p> <p>waive [2] 50/3 50/4</p> <p>waived [1] 4/25</p> <p>Wales [1] 10/1</p> <p>walking [3] 16/6 27/8 27/12</p> <p>WALL [7] 1/14 3/8 4/4 5/1 5/11 51/6 52/3</p> <p>want [11] 7/17 14/14 15/1 36/24 41/24 43/21 43/23 47/20 47/23 49/14 49/15</p> <p>wanted [2] 9/14 32/5</p> <p>wasn't [2] 23/18 34/6</p> <p>way [6] 28/13 28/15 32/21 39/16 45/15 45/15</p> <p>we'll [2] 19/7 49/13</p> <p>we're [8] 23/12 27/24 27/25 29/10 37/14 43/16 45/13 45/13</p> <p>we've [6] 12/20 20/5 22/16 22/16 33/23 42/8</p> <p>website [5] 19/5 19/12 19/13 46/18 46/25</p> <p>Wednesday [1] 1/19</p> <p>weigh [3] 12/7 14/15 27/22</p> <p>weight [2] 17/12 25/11</p> <p>went [1] 9/23</p> <p>WESTERN [1] 1/2</p> <p>what's [5] 9/7 9/21 12/14 12/14 27/21</p> <p>whatever [2] 19/9 22/4</p> <p>whatsoever [1] 11/22</p> <p>where's [1] 42/25</p> <p>WHEREOF [1] 51/14</p> <p>whether [11] 15/21 17/8 18/15 29/9 30/3 35/24 42/23 43/2 44/8 44/13 45/8</p> <p>while [1] 10/5</p> <p>who's [1] 43/1</p> <p>whole [3] 18/9 38/18 51/8</p> <p>why [3] 20/11 42/6 48/19</p> <p>width [1] 26/10</p> <p>wife [2] 9/12 11/1</p> <p>will [34] 4/12 4/19 5/8 5/21 5/23 6/13 6/23 6/24 6/24 7/2 7/5 7/11 7/12 8/1 8/8 8/11 8/14 8/17 8/20 8/22 14/1 18/3 24/16 28/4 28/15 36/17 39/12 41/25 44/18 44/19 46/16 46/16 46/23 49/21</p> <p>wishes [1] 52/4</p> <p>within [4] 4/19 9/8 51/4 51/11</p> <p>witness [7] 3/7 4/22 4/23 4/24 41/3 52/3 52/4</p> <p>Witness' [1] 5/4</p> <p>words [1] 15/14</p> <p>work [4] 9/4 9/23 17/22 44/17</p> <p>worked [2] 16/3 22/17</p> <p>working [4] 9/10 9/10 12/17 12/24</p> <p>workspace [1] 45/14</p> <p>worse [1] 33/4</p> <p>Worthwhile [1] 33/12</p> <p>would [32] 13/8 13/22 15/7 15/12 17/15 18/20 28/11 29/2 29/8 35/3 36/7 37/6 38/12 38/16 38/16 38/24 38/24 39/16 42/8 42/12 43/6 43/18 45/20</p>

W

would... [9] 46/9 46/11 46/14 46/14
47/1 47/5 47/8 50/3 50/4

wouldn't [2] 33/18 38/10

wrap [1] 49/14

write [4] 42/9 42/9 42/15 44/19

written [2] 44/24 49/25

wrong [2] 35/5 44/10

Y

ya [2] 33/13 33/13

year [3] 48/15 48/15 48/19

years [12] 12/18 12/19 12/21 12/22
12/24 13/2 16/3 16/4 16/4 22/14 22/15
34/19

years' [1] 22/20

yep [4] 6/15 13/13 17/24 26/13

yet [1] 31/5

York [1] 32/7

Yorkie [1] 33/4

you'd [1] 46/12

you're [10] 11/18 13/12 13/19 17/17
26/1 28/1 29/20 35/15 36/12 36/18

yourself [1] 7/17