

1 KENNA ANDERSON,
 2 Of lawful age, being first duly
 3 cautioned and solemnly sworn as
 4 hereinafter certified, was examined
 5 and testified as follows:
 6 (Witness' response to oath - "I do.")
 7 DIRECT EXAMINATION
 8 BY MR. HASAN:
 9 Q. Will you please state and spell your name
 10 for the record?
 11 **A. Kenna Anderson. It's K-e-n-n-a,**
 12 **A-n-d-e-r-s-o-n.**
 13 Q. Is it all right if I call you Kenna
 14 throughout this?
 15 **A. Yes.**
 16 Q. My name is Kamron Hasan. I am one of the
 17 plaintiff's attorneys in this case. And feel free to
 18 call me Kamron --
 19 **A. Okay.**
 20 Q. -- if you have any questions or anything.
 21 Kenna, have you ever had your deposition
 22 taken?
 23 **A. No.**
 24 Q. I'll go over a little bit of the process
 25 with you. Are you somewhat familiar with what this
 is, what a deposition is?

1 **A. Yes, a little bit. Yeah.**
 2 Q. Basically a question-and-answer interview
 3 where I will ask you questions throughout and you'll
 4 give me answers.
 5 **A. Okay.**
 6 Q. You understand you're under oath?
 7 **A. Yes.**
 8 Q. So, yeah. Essentially it's an interview
 9 where the purpose of today is to gather information
 10 and facts that we can use to develop the case for
 11 trial.
 12 **A. Okay.**
 13 Q. So it's important that we give audible
 14 answers. Just head nods and uh-huhs and huh-uhs,
 15 they're hard to avoid, but it's important to do our
 16 best to avoid those because Julie is taking
 17 everything down on, you know...
 18 **A. Okay. I will try to be loud. Usually...**
 19 Q. You don't have to be loud. Just audible --
 20 **A. Okay.**
 21 Q. -- so that we can get that down on paper.
 22 And on that point also, it's important that
 23 we try not to speak over each other because she's
 24 taking down everything. So if we're speaking over
 25 each other, it makes her job really, really, really,

1 really hard.
 2 **A. Okay.**
 3 Q. Harder than it normally is. I will do my
 4 best not to interrupt you. Will you do your best not
 5 to interrupt me?
 6 **A. Sure.**
 7 Q. Okay. Thank you. I will do my best to
 8 avoid this, but I may ask bad questions, questions
 9 that are maybe confusing or even that you don't
 10 understand. If I do ask a question like that, please
 11 let me know, and I will do my best to rephrase it as
 12 appropriate. Is that fair?
 13 **A. Sure. Yeah.**
 14 Q. If -- good. If you don't say anything, I
 15 will assume that you understand my question. So
 16 please let me know if you -- if you don't understand.
 17 **A. Okay.**
 18 Q. If you need a break at any point during
 19 this --
 20 I hope it doesn't go too long. I had to
 21 call a break last time to use the restroom.
 22 -- but if you need a break for anything,
 23 please just let me know. I may finish a string of
 24 questions to kind of get to a good stopping point,
 25 but I am happy to take a break any time you need.

1 All right?
 2 **A. Okay.**
 3 Q. Are you being represented by Justin and
 4 Caleb for purposes of the deposition?
 5 **A. I don't know.**
 6 MR. CHRISTOPHERSON: You are.
 7 **A. Oh, I am.**
 8 Q. (By Mr. Hasan) Well, then you may hear some
 9 objections to some of my questions; however, unless
 10 Justin or Caleb instruct you not to answer the
 11 question, you're still under a duty to answer the
 12 question that's posed. Does that make sense?
 13 **A. Yes.**
 14 Q. Anything about your physical, emotional or
 15 mental condition that will keep you from
 16 understanding my questions today?
 17 **A. From understanding them?**
 18 Q. Yeah.
 19 **A. No.**
 20 Q. Anything about your physical, emotional or
 21 mental conditions that will keep you from giving
 22 truthful and complete answers?
 23 **A. No.**
 24 Q. Okay. Any alcohol or medication today that
 25 will keep you from giving truthful and complete

1 answers?
 2 **A. Not that I am aware of, no.**
 3 Q. Okay. Is there a possibility that you are
 4 not aware...
 5 **A. I do take medication for high blood**
 6 **pressure, but I don't think that would cause any**
 7 **issue.**
 8 Q. You've never had any issues with that?
 9 **A. No.**
 10 Q. Okay. Will you let me know if that changes?
 11 **A. Yes.**
 12 Q. All right.
 13 **A. Yes. Sorry.**
 14 Q. That's just fine. What do you do for a
 15 living, Kenna?
 16 **A. I work at an animal shelter.**
 17 Q. What do you do at the animal shelter?
 18 **A. I am a volun- -- or, not a volunteer**
 19 **coordinator. An adoption coordinator.**
 20 Q. Is that your role or title, adoption
 21 coordinator?
 22 **A. Yes. Yep.**
 23 Q. What's the animal shelter?
 24 **A. Sioux City Animal Adoption & Rescue Center.**
 25 Q. Is that affiliated with the Sioux City

1 Animal Control?
 2 **A. Yes.**
 3 Q. How's it affiliated?
 4 **A. The Animal & Adoption Rescue Center is**
 5 **contracted with the City of Sioux City to perform**
 6 **animal control services.**
 7 Q. What's the -- your department look like?
 8 What's the hierarchy?
 9 **A. We don't really have a hierarchy that I am**
 10 **aware of, per se, other than Cindy Rarrat is my boss,**
 11 **and her husband, Chris Wall, is also my boss and...**
 12 Q. Okay. So it's the same organization as
 13 them?
 14 **A. Yes.**
 15 Q. How long have you been in that role?
 16 **A. Be coming on seven years, I believe. Seven**
 17 **or eight years --**
 18 Q. All right.
 19 **A. -- in April.**
 20 Q. What did you do before that?
 21 **A. I was an animal control officer with the**
 22 **City of South Sioux City.**
 23 Q. South Sioux City in?
 24 **A. Nebraska.**
 25 Q. Nebraska side?

1 **A. Yep.**
 2 Q. How long were you in that role?
 3 **A. About ten months, approximately.**
 4 Q. That would have been about 2009, 2010?
 5 **A. If my recollection -- yes, I think so.**
 6 Q. About that time?
 7 **A. Yeah.**
 8 Q. Okay. What did you do before that?
 9 **A. I was a student and a mother.**
 10 Q. All right.
 11 **A. So...**
 12 Q. All right. Good. Where were you a student?
 13 **A. At Briar Cliff University.**
 14 Q. When -- so what was your education
 15 background? What did you do there? What did you
 16 study?
 17 **A. I have a bachelor in environmental science**
 18 **with a minor in biology.**
 19 Q. Environmental science and biology. All
 20 right. Do you have any other education, background,
 21 history, things like that?
 22 **A. Other than my high school diploma and basic**
 23 **education, no.**
 24 Q. Do you have any certifications or...
 25 **A. I did do training with the National Animal**

1 **Control Association upon my employment with the Sioux**
 2 **City Animal Adoption & Rescue Center.**
 3 Q. That was Sioux City, not South Sioux City?
 4 **A. Sioux City. Yeah.**
 5 Q. That's NACA, NACA?
 6 **A. Yep.**
 7 Q. What training did you do with them?
 8 **A. I believe it was level-one training.**
 9 Q. What did that entail?
 10 **A. Oh, stayed a week in Kansas City. They**
 11 **talked a lot about how to handle animals. What I**
 12 **remember was talking about animal behavior and things**
 13 **like that, how to handle dogs. Like, if you have two**
 14 **dogs coming together, you know, reading their body**
 15 **language, stuff like that.**
 16 Q. Okay. So like being safe around animals?
 17 **A. Yeah.**
 18 Q. How to safely handle animals?
 19 **A. Yeah.**
 20 Q. Did that course -- that training course
 21 involve any identification of dog breeds?
 22 **A. Not that I remember.**
 23 Q. Okay. Do you have any other additional
 24 training with regard to either your animal control
 25 officer in South Sioux City or your current position

1 as the adoption coordinator?
 2 **A. No.**
 3 Q. Any other formal training?
 4 **A. I did take a course on large animal**
 5 **emergency rescue training.**
 6 Q. What is that through?
 7 **A. It was through a veterinary clinic in Sioux**
 8 **City. They had a lady come from – I think she's**
 9 **from Florida, and she taught us ways to safely rescue**
 10 **large animals such as cattle and horses.**
 11 Q. Okay. So much larger than, like, large
 12 dogs?
 13 **A. Yeah. Oh, yeah.**
 14 Q. Like, big animals?
 15 **A. Yeah.**
 16 Q. Okay.
 17 **A. Yes. Sorry.**
 18 Q. Probably won't be asking about those big
 19 animals much more today. It's going to be mainly
 20 about dogs.
 21 **A. Okay.**
 22 Q. Have you – have you attended any seminars
 23 or conferences other than that NACA?
 24 **A. No.**
 25 Q. Go to any dog shows, anything like that?

1 **A. No.**
 2 Q. What training did you go through before you
 3 were an animal control officer, your last job?
 4 **A. None.**
 5 Q. Any additional formal training with this
 6 job?
 7 **A. No.**
 8 Q. How about aside from your current role in
 9 your time as an animal control officer? What's your
 10 history and background with dogs?
 11 **A. I have owned dogs.**
 12 Q. So just, like, personal experience with the
 13 dogs?
 14 **A. Yes. Personal experience, yeah.**
 15 Q. No other training or immersion on dog
 16 identification?
 17 **A. No.**
 18 Q. How about for – speaking of dog
 19 identification, with your current role, what kind of
 20 additional experience do you have with identifying a
 21 breed of dog?
 22 **A. I don't understand what you're asking me.**
 23 Q. Yeah. Well, are you ever asked to identify
 24 the breed of a dog in conjunction with your current
 25 role?

1 **A. On occasion, yes.**
 2 Q. On what kind of occasion?
 3 **A. If someone comes in and says – you know, if**
 4 **they have a little – a dog, they say, hey, what kind**
 5 **of dog do you think this is? And I will look at the**
 6 **dog and tell them what I think the dog is.**
 7 Q. So what are your duties and job functions?
 8 **A. My duty, I answer the phone when customers**
 9 **call. So I do customer service. If somebody comes**
 10 **in and is interested in adopting a dog or a cat, I**
 11 **help with that. Coordinate adoption applications if**
 12 **they need to fill out an adoption application, things**
 13 **like that.**
 14 **I do fill in for animal control officers if**
 15 **they call in sick or have to take a day off. So I**
 16 **was previously an animal control officer with the –**
 17 **with the shelter.**
 18 Q. So you go in the field sometimes?
 19 **A. Yes.**
 20 Q. What's your involvement with keeping track
 21 of reports, animal control reports?
 22 **A. The incident reports?**
 23 Q. Yes.
 24 **A. If – when the officers turn in the incident**
 25 **reports, I go through them to make sure they have as**

1 **much information as they could gather and the**
 2 **information is where it's supposed to be on the**
 3 **report. I check if it was a productive call or a**
 4 **nonproductive call.**
 5 **And I make copies of it and file it or give**
 6 **it to the – the copies to Cindy, and then she files**
 7 **them away, and then the rest of the reports I send**
 8 **down to the police department.**
 9 Q. Okay. So Cindy does the filing away?
 10 **A. Usually it's Cindy or Chris. With the**
 11 **incident reports, I usually put them away –**
 12 Q. Okay. So...
 13 **A. – when she's done going through them.**
 14 Q. Talking about the incident reports, I will
 15 have you look at just an example page. Okay. So
 16 this is in Exhibit 6. I am going to pass you that in
 17 this binder. Do you see at the bottom right where it
 18 says Sioux City records and then a bunch of zeros,
 19 837?
 20 **A. Uh-huh. Yes.**
 21 Q. Is this one of the incident report cards
 22 that you would look at?
 23 **A. No.**
 24 Q. What is this?
 25 **A. This looks like an impound card.**

- 1 Q. Okay. Do you have any role in filling out
2 these impound cards at all?
- 3 **A. Only if an owner comes in to reclaim a dog.
4 I can write down the owner's information, you know,
5 the cost of the impound fees, things of that...**
- 6 Q. Okay. So specifically using this as an
7 example, there's a couple of different types of
8 handwriting on there.
- 9 **A. Uh-huh.**
- 10 Q. Would you be kind of the person helping fill
11 out where -- the owner and the address and the
12 contact information?
- 13 **A. Yes.**
- 14 Q. That would be your role in filling these
15 out?
- 16 **A. Yes.**
- 17 Q. Okay.
- 18 **A. Yep.**
- 19 Q. Thank you. I will get that out of the way.
20 All right. So just recapping your functions
21 and your job duties, you said that customer service,
22 helping with adoption, paperwork and adoption
23 procedures --
- 24 **A. Uh-huh.**
- 25 Q. -- and that you'd fill in for animal control

- 1 officers if the animal control officers are off?
- 2 **A. Yes.**
- 3 Q. Anything else as far as functions? Sorry.
4 You also track reports and do that.
- 5 **A. Yes. Part of the customer service would be,
6 you know, filling in information on the impound
7 cards, things like that.**
- 8 Q. Okay. And I want to talk mainly today about
9 dog breeds and specifically a re- -- are you aware of
10 the lawsuit that's going on right now?
- 11 **A. Vaguely.**
- 12 Q. So generally it's about the pit bull ban.
- 13 **A. Okay.**
- 14 Q. And I want to talk about identification of
15 dogs as it relates to pit bulls.
- 16 **A. Okay.**
- 17 Q. So I asked you earlier about your background
18 and your experience kind of generally related to
19 animals and dogs. Just generally speaking, are you
20 ever asked to identify the predominant breed of a
21 dog?
- 22 **A. Yeah.**
- 23 Q. What is it that you base your opinion on?
- 24 **A. Just experience.**
- 25 Q. Okay. So your experience as -- in your

- 1 current role?
- 2 **A. Yeah. And life experience, I guess.**
- 3 Q. Just daily interactions with dogs?
- 4 **A. Yes.**
- 5 Q. Did anyone within your current job provide
6 you with any additional formal training on how to
7 identify dogs?
- 8 **A. Well, Cindy would point stuff out, you know,
9 if it -- if a dog appears to be one breed or another.**
- 10 Q. How would she do that?
- 11 **A. She would show us the dog and explain to us
12 and point stuff out.**
- 13 Q. Like specific traits and attributes?
- 14 **A. Yeah.**
- 15 Q. Okay. So let's talk about the municipal
16 code. Are you familiar with the Sioux City Municipal
17 Code?
- 18 **A. Yes.**
- 19 Q. Specifically as relates to animals?
- 20 **A. Yes.**
- 21 Q. Are you familiar with the pit bull ban?
- 22 **A. I am.**
- 23 Q. What's your understanding of that ban?
- 24 **A. I understand that dogs that appear to be or
25 look like pit bulls or American Staffordshire Pit**

- 1 **Bull Terriers or American Staffordshire Terriers are
2 banned from the city of Sioux City.**
- 3 Q. So I am going to show you Exhibit 101 here,
4 page 37. It's held together by a binder clip. So if
5 it flips closed on you, it's page 37. Is what I am
6 showing you right there the general definition of pit
7 bull that you're familiar with?
- 8 **A. Uh-huh. Yes.**
- 9 Q. Told you. That's unavoidable. So what is
10 your role as related to the pit bull ban?
- 11 **A. I don't really have a role, I wouldn't say.
12 I don't know.**
- 13 Q. Are you ever asked --
- 14 **A. I mean...**
- 15 Q. -- to opine as to whether a specific dog is
16 a pit bull?
- 17 **A. Very infrequently.**
- 18 Q. How frequent would you say that is?
- 19 **A. I have no idea.**
- 20 Q. So under what circumstances would you be
21 asked to make that opinion?
- 22 **A. If an officer brings a dog into the office
23 and says, hey, does this look like a pit bull to you?
24 And I look at the dog, and I see the dog, and I say,
25 well, yeah, it kind of looks like a pit bull or it**

1 **doesn't look like a pit bull or – and then I tell**
 2 **them you need to – you know, we ask everybody that's**
 3 **there, hey, this – what do you think and what does**
 4 **that person think, and we go from there.**

5 Q. Okay.

6 **A. If there's any argument or any discussion,**
 7 **you know, over – about that particular dog, then,**
 8 **you know, we go to Cindy and say, hey, what do you**
 9 **think?**

10 Q. So if there's a – almost a dispute or
 11 differing opinions, you'll go to Cindy and she'll
 12 make the call?

13 **A. Yeah. And that doesn't happen very often.**

14 Q. Okay. But...

15 **A. It's pretty straight forward.**

16 Q. Okay. So is your role as related to the pit
 17 bull ban kind of a second opinion?

18 **A. Or third or fourth or fifth maybe.**

19 Q. Okay. But not the initial determination?

20 **A. No.**

21 Q. How about when you fill in for animal
 22 control officers?

23 **A. If the need arises, then, yes.**

24 Q. Has that ever happened, in your experience?

25 **A. Not that I can recollect, no.**

1 Q. You can't ever remember being out in the
 2 field and enforcing or identifying a dog as a pit
 3 bull?

4 **A. Not right off the top of my head. I don't**
 5 **cover for the officers very often. So...**

6 Q. Okay. Just when they're sick, you said?

7 **A. Yeah.**

8 Q. Okay.

9 **A. When they're sick or they need vacation time**
 10 **or something.**

11 Q. Got it. So I want to talk about how you
 12 were to identify – you were asked to identify what
 13 breed of dog a subject dog is.

14 **A. Okay.**

15 Q. I want to talk about how you do that. Is
 16 that okay?

17 **A. Sure.**

18 Q. So have you ever reviewed the United Kennel
 19 Club breed standards for the American Pit Bull
 20 Terrier?

21 **A. No.**

22 Q. How about the American Kennel Club breed
 23 standards for the American Staffordshire Terrier?

24 **A. No.**

25 Q. Or the American Kennel Club's breed

1 standards for the Staffordshire Bull Terrier?

2 **A. No.**

3 Q. So how is it that you would come to be
 4 familiar with what one of these purebred dogs looks
 5 like?

6 **A. Just experience.**

7 Q. Have you ever experienced on the job a
 8 purebred American Pit Bull Terrier?

9 **A. I...**

10 Q. I guess the first question is: How would
 11 you know whether a dog that is – is it fair for me
 12 to call it the kennel? Can I call it the kennel?

13 **A. The shelter?**

14 Q. Or the shelter? I will call it the shelter.

15 **A. Okay.**

16 Q. So how would you know whether a dog in the
 17 shelter is a purebred?

18 **A. Just looking at it.**

19 Q. So you – you'd be able to identify a dog as
 20 a purebred based on visual identification?

21 **A. Sure.**

22 Q. So...

23 **A. Or, mostly that breed. I mean...**

24 Q. Right.

25 **A. Yeah.**

1 Q. But specifically for a purebred – because
 2 if we flip back to – let's go back to page 37 of
 3 that in front of you.

4 **A. I have got to find it.**

5 Q. Yeah. Take your time. Let me know when
 6 you're there.

7 **A. I am here.**

8 Q. Okay.

9 **A. Sorry.**

10 Q. So the ordinance essentially splits the
 11 definition of pit bull into two separate categories.
 12 Is that fair? That says first the three specific
 13 breeds. The first part of the first sentence says
 14 American Pit Bull Terrier, American Staffordshire
 15 Terrier or Staffordshire Bull Terrier; right?

16 **A. Uh-huh.**

17 Q. That's a yes?

18 **A. Yes.**

19 Q. Okay. And then it goes on to any dog that
 20 has the appearance or characteristics of being
 21 predominantly, and then it lists those three
 22 purebreds; right?

23 **A. Yes.**

24 Q. So essentially it splits up into those three
 25 purebreds or dogs that exhibit the characteristics

- 1 and appearance of those purebreds?
 2 **A. Yes.**
 3 Q. So I guess kind of going back to what I was
 4 asking before, we referenced this definition. How
 5 would you know whether the dog is -- actually, strike
 6 that.
 7 Based on this definition --
 8 **A. Uh-huh.**
 9 Q. -- where if there are three purebreds, have
 10 you ever encountered a purebred of one of those three
 11 dogs listed there?
 12 **A. I don't know.**
 13 Q. Because it's based on visual identification?
 14 **A. Yes.**
 15 Q. So to your knowledge you have experienced
 16 mixed-breed dogs that you believe exhibit the
 17 appearance and characteristics of those breeds?
 18 **A. Yes.**
 19 Q. Okay. So it's fair to say that you make a
 20 breed determination based on visual identification?
 21 **A. Yes.**
 22 Q. It's not like you're looking at -- do you
 23 ever look at DNA --
 24 **A. No.**
 25 Q. -- or ownership breed paperwork, anything

- 1 like that?
 2 **A. No.**
 3 Q. So it's visual identification?
 4 **A. Yes.**
 5 Q. Okay. You know you're -- you have got the
 6 statute or the ordinance there in front of you. It
 7 says the appearance or characteristics of being
 8 predominantly one of those three breeds. I want to
 9 talk about how you make the determination of whether
 10 the dog is predominantly one of those. Okay?
 11 **A. Okay.**
 12 Q. So I want to go through a list of traits or
 13 features or characteristics that I have thought of
 14 and ask you if that's something that you would
 15 consider in making a determination. Is that fair?
 16 **A. Sure.**
 17 Q. Would you ever look at the coloring of a
 18 dog?
 19 **A. No.**
 20 Q. How about the pattern of the coloring?
 21 **A. No.**
 22 Q. The coat texture?
 23 **A. Yes.**
 24 Q. In what circumstances?
 25 **A. Most -- because different dogs have**

- 1 **different coat textures, different...**
 2 Q. Like fluffy or wiry?
 3 **A. You have double coats. You have, you know,**
 4 **like poodle coats. You have flat coats.**
 5 Q. Okay. I understand that. So how about coat
 6 length?
 7 **A. Yeah. That would be the same as with the**
 8 **coat texture, I would think.**
 9 Q. Oh, they're the same?
 10 **A. Yeah.**
 11 Q. How about the overall body size?
 12 **A. Absolutely.**
 13 Q. Does that include the type of body, like the
 14 shape?
 15 **A. Yes.**
 16 Q. The length?
 17 **A. Yep.**
 18 Q. The weight of the dog?
 19 **A. Yeah, for the most part. I am really not**
 20 **good at guesstimating weights of dogs. So I go more**
 21 **by visual appearance instead of actually weighing it.**
 22 Q. Okay. That's -- yeah. The apparent weight
 23 of a dog is what you're saying, the way it looks?
 24 **A. Yeah. Some...**
 25 Q. It appears to be...

- 1 **A. Like I said, I don't go by that very often**
 2 **because I have got a dog at home that should be**
 3 **40 pounds, and he's about 80.**
 4 Q. I think my...
 5 **A. And I have got another dog that should be**
 6 **seven pounds, and she's only about four.**
 7 Q. That's a tiny dog.
 8 **A. So -- she's a teacup. Yeah.**
 9 Q. Yeah. Okay. So how about muscle mass?
 10 **A. Not necessarily.**
 11 Q. No?
 12 **A. (Witness shakes head side to side.)**
 13 Q. How about the chest size?
 14 **A. That will be part of it, yeah.**
 15 Q. Topline angle? The angle from the shoulders
 16 down to the hips?
 17 **A. Not always, no. That could be different.**
 18 Q. But sometimes you might consider that?
 19 **A. Yeah.**
 20 Q. How about leg length?
 21 **A. Leg length.**
 22 Q. How tall the legs are?
 23 **A. Yeah. That's a consideration.**
 24 Q. The head shape?
 25 **A. Yes.**

- 1 Q. You said that one pretty definitively. Is
2 that a big one?
- 3 **A. Yeah.**
- 4 Q. The -- how about the length of the head?
- 5 **A. Sometimes, yeah.**
- 6 Q. The width of the head?
- 7 **A. Sure.**
- 8 Q. The muzzle shape?
- 9 **A. Yeah.**
- 10 Q. Eye color?
- 11 **A. No.**
- 12 Q. How about ear shape?
- 13 **A. Not often, no.**
- 14 Q. Ear size?
- 15 **A. No.**
- 16 Q. The neck size?
- 17 **A. No.**
- 18 Q. The shape of the neck?
- 19 **A. Oh, yeah, I guess.**
- 20 Q. Maybe?
- 21 **A. Maybe.**
- 22 Q. Depending on the dog?
- 23 **A. I look at the whole package.**
- 24 Q. Okay. So within that whole package, let's
25 see if there's other specifics that you'll consider.

- 1 How about, like, the jaws or jawline?
- 2 **A. Yeah. That's something you would look at in
3 a dog.**
- 4 Q. Do you ever look at the tongue color?
- 5 **A. No.**
- 6 Q. The tail shape?
- 7 **A. No.**
- 8 Q. The size of the tail?
- 9 **A. No.**
- 10 Q. So you mentioned that it's kind of the whole
11 package. You know, you have got the ordinance there
12 if you need to refer to it, but it says predominantly
13 one of those breeds.
- 14 **A. Uh-huh. Yes.**
- 15 Q. How is it that you come to the determination
16 that it's predominantly one of the breeds? Because
17 we just went through -- let me rephrase my question.
18 Because we just went through, you know, 20
19 or 25 different indicators on a dog. And, you know,
20 obviously there are differences in those indicators;
21 right?
- 22 **A. Yes.**
- 23 Q. So if there are differences in those
24 indicators, how is it that you come to the
25 determination that a predominant breed of a dog is

- 1 one of those three purebreds?
- 2 **A. Just by looking at it.**
- 3 Q. Well, sure. I mean, it's going to be a
4 visual identification, but, I mean, what about all of
5 those different traits tells you this is a pit bull?
- 6 **A. Just my experience of seeing other pit bulls
7 or dogs of that type.**
- 8 Q. So is it like a comparison to other
9 photographs?
- 10 **A. No. Just other dogs. I have -- you know,
11 it's...**
- 12 Q. Do you actually...
- 13 **A. A Chihuahua is different than an Am Staff --**
- 14 Q. Sure. That --
- 15 **A. -- you know.**
- 16 Q. -- is definitely true. That is definitely
17 true. But as far as, you know, if you're called to
18 give your second or third opinion, whatever the case
19 may be, and you look at the dog, is it kind of a
20 check the box to determine if it's predominant?
- 21 **A. No.**
- 22 Q. Is it -- is...
- 23 **A. We don't have a checklist that we go through
24 and, well, it has this size head or legs are this
25 long or -- you know, you just look at it.**

- 1 Q. It's just you know it when you see it?
- 2 **A. Yeah.**
- 3 Q. Okay. So what happens if people disagree?
- 4 **A. Then we leave it up to the boss.**
- 5 Q. Okay. So mainly it would be Cindy's
6 decision?
- 7 **A. Yeah, if there's a big disagreement. For
8 the most part, we'll all pretty well educated enough
9 to know the difference between dog breeds --**
- 10 Q. Sure.
- 11 **A. -- I would think.**
- 12 Q. Okay. Do you ever use photographs as a
13 reference?
- 14 **A. No. I've never used photographs as a
15 reference.**
- 16 Q. There's a chart in the shelter, right, a
17 breed chart?
- 18 **A. Yeah.**
- 19 Q. Do you ever...
- 20 **A. We've got one hanging up in the back.**
- 21 Q. Do you ever use that?
- 22 **A. I don't.**
- 23 Q. Have you seen anyone else use that?
- 24 **A. Not that I can recall.**
- 25 Q. Do you know why that's up there?

- 1 **A. In case somebody does need it, I guess.**
 2 Q. As a potential reference?
 3 **A. Yeah.**
 4 Q. Okay. So in your experience, either with
 5 South Sioux City or at the adoption center, how often
 6 have you encountered any purebred dog, not just a --
 7 one of the three pit bulls?
 8 **A. I have no idea. I am -- daily. I mean, we**
 9 **had dogs in every day.**
 10 Q. So specifically related to known purebreds?
 11 **A. I have no idea. I can't say definitively**
 12 **one way or another.**
 13 Q. Okay.
 14 **A. I mean, we have dogs that come in that look**
 15 **like purebreds.**
 16 Q. Okay. But as far as, like, a documented
 17 purebred, can you think of how often you would have
 18 had a documented purebred come through?
 19 **A. I don't know if we -- that we document**
 20 **purebreds. We go by appearance. If it comes in and**
 21 **it looks like a black lab, we write down that it's a**
 22 **black lab.**
 23 Q. Okay. When you're making determinations, I
 24 think you mentioned earlier that you don't consider
 25 DNA?

- 1 **A. No.**
 2 Q. Why is that?
 3 **A. I don't know. That's just a decision the**
 4 **city's made.**
 5 Q. If an owner presented a DNA test, would that
 6 be something you'd consider in...
 7 **A. No.**
 8 Q. Why is that?
 9 **A. Because how do I know they took the DNA from**
 10 **that dog?**
 11 Q. So how about if the -- Cindy ordered a DNA
 12 test done on a dog and the DNA results came back?
 13 Would that be something you'd consider?
 14 **A. Not if it looks like a pit bull and the DNA**
 15 **comes back as a Chihuahua. Then I am not going to**
 16 **call that dog a Chihuahua even if the DNA says that.**
 17 Q. Okay. So a visual appearance will always
 18 trump the DNA for you?
 19 **A. For me, yes.**
 20 Q. Okay. Were you involved with the actual
 21 impounding of the dogs?
 22 **A. No. Only if someone finds one running loose**
 23 **and brings it into the off- -- into the office.**
 24 Q. Like a citizen found one and brought it in?
 25 **A. Yeah.**

- 1 Q. Have you ever encountered a situation where
 2 a citizen found one running loose that was deemed to
 3 be a pit bull?
 4 **A. I have no idea. I don't remember.**
 5 Q. Okay. What kind of dogs do you own?
 6 **A. Do I own?**
 7 Q. Yeah.
 8 **A. I own six dogs.**
 9 Q. All right.
 10 **A. And as far as I am concerned, they're all**
 11 **mutts --**
 12 Q. Okay.
 13 **A. -- for -- well, except one. Maybe two.**
 14 **Chip's a Chihuahua, and my -- I have a Pug named**
 15 **Otis.**
 16 Q. What are the other names?
 17 **A. What's that?**
 18 Q. What are your other dogs' names?
 19 **A. I have a dog named Mojo, a dog named Waffle,**
 20 **a dog named Otis, Madison, Libby and Chip.**
 21 Q. Fun names. So if you were asked to give
 22 your opinion on the predominant breed of any of your
 23 dogs --
 24 **A. Uh-huh.**
 25 Q. -- what would the predominant breed of those

- 1 other dogs be?
 2 **A. Madison is a Teacup Chihuahua. Libby is a**
 3 **long-haired Teacup Chihuahua. Otis is a Pug. Chip**
 4 **is a standard Chihuahua. Waffle is a Heinz 57. He's**
 5 **got a little bit of everything. He's got pit bull in**
 6 **him. He's got American Staffordshire Pit Bull**
 7 **Terrier, whatever you want to call it, in him.**
 8 Q. Okay.
 9 **A. He's got Boxer in him. I have no idea.**
 10 Q. I have never heard a dog called a Heinz 57
 11 before.
 12 **A. And then I have got Mojo, and Mojo has got**
 13 **the -- yeah, he looks like an Am Staff.**
 14 Q. Okay.
 15 **A. So...**
 16 Q. Have you ever had DNA tests done on any of
 17 them?
 18 **A. No.**
 19 Q. So when you say that they -- you think that
 20 these dogs -- your dogs have Am Staff or
 21 Staffordshire in them, it's based on visual?
 22 **A. Yes.**
 23 Q. When making the breed -- when making the
 24 breed determination, do you ever refer to the breed
 25 standards from any of these kennel clubs?

- 1 **A. No.**
 2 Q. Or written descriptions for these?
 3 **A. No.**
 4 Q. So what happens if a dog owner disputes a
 5 determination that the subject dog is a pit bull
 6 under the ordinance?
 7 **A. If they dispute that it's a pit bull?**
 8 Q. (Nods head up and down.)
 9 **A. They have the opportunity to go in front of**
 10 **the city manager and plead a case to him, I guess.**
 11 Q. Have you ever been involved with a
 12 situation –
 13 **A. No.**
 14 Q. – where a dog owner has ever disputed the
 15 determination?
 16 **A. No. No.**
 17 Q. In your opinion are certain breeds more
 18 aggressive than others?
 19 **A. No.**
 20 Q. Okay. In your experience are physical
 21 features or characteristics predictive of how a dog
 22 is going to behave?
 23 **A. No.**
 24 Q. Are you familiar with the plaintiff in this
 25 case, Kali Myers?

- 1 **A. No. Just through hearsay at the shelter.**
 2 Q. Okay. So you never dealt with her?
 3 **A. No, other than I did speak with her on the**
 4 **phone, I believe, maybe on one or two occasions when**
 5 **her dog was at the shelter. And that was it.**
 6 Q. Involved – were you ever involved with the
 7 determination of what kind of a breed of dog her dog
 8 was?
 9 **A. No.**
 10 Q. Ever asked to give an opinion as to that?
 11 **A. No, not that I recall.**
 12 Q. So in your experience how often are there
 13 disputes as to the predominant breed of a dog?
 14 **A. Like, how?**
 15 Q. Yeah. Let me rephrase that. So dogs are
 16 impounded – are all dogs that are impounded, are
 17 they assigned what – a predominant dog breed?
 18 **A. Yeah, generally.**
 19 Q. So if a dog comes into the shelter, there
 20 will be a predominant breed attached, name attached
 21 to it?
 22 **A. Yes.**
 23 Q. Once it comes into the shelter, how often is
 24 that determination disputed or challenged amongst the
 25 staff?

- 1 **A. Amongst the staff?**
 2 Q. Sure.
 3 **A. Not very often, if ever, that I can**
 4 **remember.**
 5 Q. So...
 6 **A. Maybe once or twice, but not very often, no.**
 7 Q. Are you talking about breed in general or
 8 breeds related to pit bulls?
 9 **A. Breeds in general.**
 10 Q. So if a dog comes in under any breed that's
 11 listed on the impound card except for the one or two
 12 situations, that's generally what the decision is?
 13 **A. Yeah, generally what – you know, I mean, if**
 14 **you look at the – all of the dogs that we impound, I**
 15 **am sure it happens more often, but I don't remember a**
 16 **whole lot of them.**
 17 Q. Okay. But in your experience it doesn't
 18 happen frequently where a dog comes in and then
 19 there's a debate and then the predominant breed
 20 determination changes?
 21 **A. No.**
 22 Q. Has that ever happened with a dog that was
 23 deemed to be a pit bull –
 24 **A. No.**
 25 Q. – when it came in?

- 1 **A. I mean, I suppose if it has, I mean, I don't**
 2 **recall any specifics.**
 3 Q. In – so in your experience specifically do
 4 you remember any circumstances where a dog came in as
 5 a pit bull and then was changed to not a pit bull?
 6 **A. Maybe once or twice.**
 7 Q. Will you tell me about those?
 8 **A. I don't remember. The officers may bring in**
 9 **a dog that they think is a pit bull and when, you**
 10 **know, anybody else looks at it and if they think**
 11 **otherwise, then we'd say, bring it up front and have**
 12 **Cindy look at it.**
 13 Q. Sure.
 14 **A. I don't remember any specific incidences**
 15 **right off the top of my head, no.**
 16 Q. Okay.
 17 **A. You know, I can't tell you, like, three**
 18 **weeks ago, last year, or something on this date.**
 19 Q. No, but do you remember it ever happening?
 20 **A. I mean, I am sure it's happened, but I**
 21 **don't – you know, I know it has happened, but I**
 22 **don't remember the exact situation that it's**
 23 **happened.**
 24 Q. In your experience have there been
 25 circumstances where a dog has been deemed to be a pit

1 bull and, nevertheless, released back to the dog
2 owner?
3 **A. I don't know.**
4 Q. Again, in your experience if...
5 **A. I don't think so. Not that I have dealt**
6 **with, no.**
7 Q. Yeah. And I don't want you to speculate as
8 to what other people have done or anything like that.
9 **A. Yeah.**
10 Q. Just specifically with what you have
11 experienced.
12 **A. Well, yeah, not with my recollection or**
13 **experience, no.**
14 Q. Okay. I want to talk about the tracking
15 reports from the previous day.
16 **A. Okay.**
17 Q. You said that one of your job functions is
18 to keep track of the reports that come in from the...
19 **A. The incident reports. Yes.**
20 Q. Right. I want to talk about that some
21 specifically with related to enforcement of the pit
22 bull ban.
23 **A. Okay.**
24 Q. So how's that – how do you handle those,
25 the incident reports where the reason for the

1 incident is the pit bull ban?
2 **A. Oh, gosh, I have no idea. You mean like**
3 **I – restate your question.**
4 Q. Yeah. So if there – am I correct that when
5 you come in, part of your daily duties are to handle
6 the incident reports from the prior day?
7 **A. Yes.**
8 Q. So if amongst the incident reports from the
9 prior day there's an enforcement of the pit bull
10 ban – you still...
11 **A. Okay.**
12 Q. You still with me?
13 **A. Yeah. If – like if somebody had a call for**
14 **an illegal pit bull at a residence?**
15 Q. Sure.
16 **A. Okay. Sure.**
17 Q. So if you had that incident report, what do
18 you do with that incident report?
19 **A. Same thing I do with all of the others.**
20 Q. Which would be?
21 **A. I check to make sure all of the information**
22 **on it is there that's needed that we had – if the**
23 **officer's had that information, if it's put on there**
24 **correctly, like dates and times. I see what their**
25 **findings were for the call. I, you know, see if it's**

1 **a productive call or a nonproductive call, and I**
2 **check it off and make a copy.**
3 Q. Do you contact the owners, the dog owners?
4 **A. Most of the time there's no owners on them.**
5 Q. Okay.
6 **A. I mean, if – I don't contact the owners,**
7 **no.**
8 Q. You don't do that as part of your...
9 **A. Like, I don't – there's not owners on an**
10 **incident report –**
11 Q. Okay. It doesn't...
12 **A. – unless we impounded a dog.**
13 Q. Sure. But if you impounded a dog and
14 there's owner information, would you contact the
15 owners under those circumstances?
16 **A. Myself, no.**
17 Q. No. Okay.
18 **A. Not necessarily.**
19 Q. When you say productive versus unproductive
20 call, what does that mean?
21 **A. If they get a call for a dead squirrel and**
22 **they remove the dead squirrel, they did something on**
23 **the call. It was productive. If they get a call for**
24 **a dead squirrel and they drive around and they don't**
25 **remove the dead squirrel for one reason or another,**

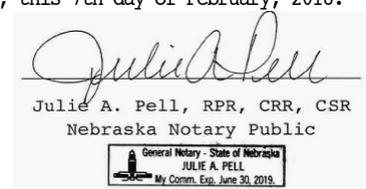
1 **it's nonproductive.**
2 Q. Got it. Okay. So if we're talking about
3 enforcing the pit bull ban, would a productive call
4 be someone calling in saying, I think there's a pit
5 bull on the loose –
6 **A. Okay.**
7 Q. – and then would – what would make that
8 productive, responding to that call?
9 **A. Well, it would be any call – any dog at**
10 **large call.**
11 Q. Okay.
12 **A. If they got a call for a dog at large and**
13 **they went and they found the dog and they impounded**
14 **the dog and they looked for the dog, that's a**
15 **productive call. If they drove around the block once**
16 **and didn't find the dog, that's nonproductive.**
17 MR. HASAN: Okay. Okay. Do you want to
18 take a quick break?
19 THE WITNESS: Sure.
20 (A recess was taken from
21 12:44 p.m. to 12:48 p.m.)
22 Q. (By Mr. Hasan) So going back to, you were
23 talking about how it is that you form an opinion on
24 dog breed determination.
25 **A. Uh-huh.**

1 Q. What the predominant breed of dog is. Is it
 2 fair to say that it's based on your personal
 3 encounters with dogs?
 4 **A. Yes.**
 5 Q. Have you ever reviewed or studied any
 6 scientific studies or reports on ability to identify
 7 the predominant breed in a dog?
 8 **A. No.**
 9 Q. What did you do to prepare for today?
 10 **A. I put on makeup.**
 11 Q. Earlier Chris said that he took a shower.
 12 MR. VONDRAK: That's the second time that
 13 something like that's happened.
 14 **A. I don't get dressed up very often. So this**
 15 **is about as dressy as I get.**
 16 Q. (By Mr. Hasan) Did you review any documents
 17 or any...
 18 **A. I am a farmer.**
 19 Q. Did you review any documents or anything
 20 like that?
 21 **A. Just the ordinance that you gave me.**
 22 Q. Okay. Did you speak with any of your animal
 23 control officer peers?
 24 **A. No.**
 25 Q. Cindy or Chris?

1 **A. They told me the date and time that I am**
 2 **supposed to be there.**
 3 Q. Besides that?
 4 **A. No. No. I mean, they kind of gave me a**
 5 **general idea, hey, you've got a deposition about the**
 6 **pit bull ban. And I know I was supposed to be here**
 7 **last week, but I couldn't be. So...**
 8 Q. Yeah. That's -- that's...
 9 **A. That's about the gist of it.**
 10 Q. The scheduling actually worked out well for
 11 everyone. So...
 12 **A. Mother nature. She's a character this time**
 13 **of a year.**
 14 Q. That was a beast of a snowstorm.
 15 **A. Yes.**
 16 Q. Big one.
 17 **A. Yeah.**
 18 Q. But what did Cindy or Chris tell you about
 19 today?
 20 **A. Just that you were going to have a**
 21 **deposition about the pit bull ban.**
 22 MR. HASAN: Okay. All right. That's all I
 23 have for now.
 24 THE WITNESS: Okay.
 25 MR. VONDRAK: I have no follow-up.

1 MR. HASAN: That's all I have for good
 2 then.
 3 THE WITNESS: All right.
 4 MR. VONDRAK: Thank you.
 5 THE WITNESS: Uh-huh.
 6 MR. HASAN: You have the right to read and
 7 sign your deposition transcript, essentially to look
 8 at the questions I asked and the answers you provided
 9 and make any changes to your answers. I believe the
 10 answer is going to be that you'll read and sign, but
 11 I will ask your attorneys to...
 12 THE WITNESS: Just send me, like, a copy of
 13 it?
 14 MR. HASAN: Yeah.
 15 MR. VONDRAK: Yeah. We'll review it with
 16 you and have you sign it.
 17 THE WITNESS: Okay. Yeah. I would like to
 18 have a copy of that.
 19 MR. HASAN: Perfect. Thank you for your
 20 time.
 21 (The deposition concluded at 12:51 p.m.)
 22
 23
 24
 25

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 KENNA ANDERSON
 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 7th day of February, 2018.
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| 1 | Affix [1] 49/24 Again [1] 41/4 age [1] 5/2 aggressive [1] 37/18 ago [1] 40/18 agreed [1] 4/2 al [1] 49/2 alcohol [1] 8/24 almost [1] 21/10 aloud [1] 4/18 also [3] 6/22 10/11 18/4 always [2] 28/17 34/17 Amendment [2] 3/5 49/1 American [10] 19/25 20/1 22/19 22/22 22/23 22/25 23/8 24/14 24/14 36/6 amongst [3] 38/24 39/1 42/8 ANDERSON [7] 1/14 3/8 4/4 5/1 5/10 48/6 49/3 angle [2] 28/15 28/15 animal [22] 9/16 9/17 9/23 9/24 10/1 10/4 10/6 10/21 11/25 12/2 12/12 12/24 13/4 14/3 14/9 15/14 15/16 15/21 17/25 18/1 21/21 45/22 animals [8] 12/11 12/16 12/18 13/10 13/14 13/19 18/19 19/19 another [4] 19/9 28/5 33/12 43/25 answer [5] 6/2 8/10 8/11 15/8 47/10 answers [6] 6/4 6/14 8/22 9/1 47/8 47/9 any [35] 5/19 7/18 7/25 8/24 9/6 9/8 11/20 11/24 12/21 12/23 13/3 13/22 13/25 14/5 17/1 19/6 21/6 21/6 24/19 33/6 35/22 36/16 36/25 39/10 40/2 40/4 40/14 44/9 44/9 45/5 45/16 45/17 45/19 45/22 47/9 anybody [1] 40/10 anyone [2] 19/5 32/23 anything [10] 5/19 7/14 7/22 8/14 8/20 13/25 18/3 25/25 41/8 45/19 apparent [1] 27/22 appear [1] 19/24 appearance [7] 24/20 25/1 25/17 26/7 27/21 33/20 34/17 Appearances [1] 3/2 appears [2] 19/9 27/25 application [1] 15/12 applications [1] 15/11 appropriate [1] 7/12 approximately [1] 11/3 April [1] 10/19 argument [1] 21/6 arises [1] 21/23 around [3] 12/16 43/24 44/15 aside [1] 14/8 ask [6] 6/3 7/8 7/10 21/2 26/14 47/11 asked [9] 14/23 18/17 18/20 20/13 20/21 22/12 35/21 38/10 47/8 asking [3] 13/18 14/22 25/4 assigned [1] 38/17 Assistant [1] 2/9 Association [1] 12/1 assume [1] 7/15 attached [3] 38/20 38/20 48/15 attended [1] 13/22 attorney [2] 4/11 48/11 attorneys [3] 2/9 5/16 47/11 attributes [1] 19/13 audible [2] 6/13 6/19 avoid [3] 6/15 6/16 7/8 aware [4] 9/2 9/4 10/10 18/9 away [3] 16/7 16/9 16/11 | B bachelor [1] 11/17 back [8] 24/2 24/2 25/3 32/20 34/12 34/15 41/1 44/22 background [4] 11/15 11/20 14/10 18/17 bad [1] 7/8 ban [11] 18/12 19/21 19/23 20/10 21/17 41/22 42/1 42/10 44/3 46/6 46/21 banned [1] 20/2 base [1] 18/23 based [6] 23/20 25/7 25/13 25/20 36/21 45/2 basic [1] 11/22 Basically [1] 6/2 beast [1] 46/14 before [7] 4/5 10/20 11/8 14/2 25/4 36/11 49/21 behave [1] 37/22 behavior [1] 12/12 being [6] 5/2 8/3 12/16 22/1 24/20 26/7 believe [5] 10/16 12/8 25/16 38/4 47/9 Besides [1] 46/3 best [5] 6/16 7/4 7/4 7/7 7/11 between [2] 4/2 32/9 big [5] 13/14 13/18 29/2 32/7 46/16 binder [2] 16/17 20/4 biology [2] 11/18 11/19 bit [3] 5/23 6/1 36/5 black [2] 33/21 33/22 Blackwell [1] 2/3 block [1] 44/15 blood [1] 9/5 body [3] 12/14 27/11 27/13 boss [3] 10/10 10/11 32/4 bottom [1] 16/17 box [2] 2/10 31/20 Boxer [1] 36/9 break [5] 7/18 7/21 7/22 7/25 44/18 breed [29] 14/21 14/24 18/20 19/9 22/13 22/19 22/22 22/25 23/23 25/16 25/20 25/25 30/25 32/17 35/22 35/25 36/23 36/24 36/24 38/7 38/13 38/17 38/20 39/7 39/10 39/19 44/24 45/1 45/7 breeds [11] 12/21 18/9 24/13 25/17 26/8 30/13 30/16 32/9 37/17 39/8 39/9 Briar [1] 11/13 bring [2] 40/8 40/11 brings [2] 20/22 34/23 brought [1] 34/24 bull [37] 18/12 19/21 20/1 20/7 20/10 20/16 20/23 20/25 21/1 21/17 22/3 22/19 23/1 23/8 24/11 24/14 24/15 31/5 34/14 35/3 36/5 36/6 37/5 37/7 39/23 40/5 40/5 40/9 41/1 41/22 42/1 42/9 42/14 44/3 44/5 46/6 46/21 bulls [5] 18/15 19/25 31/6 33/7 39/8 bunch [1] 16/18 |
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