THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of General Session

R. Scott Sprouse, Circuit Court Judge

Appellate Case No. 2015-002459

State of South Carolina, Respondent,

v.

Debra Lynne Sheridan Appellant.

RECORD ON APPEAL
VOLUME I

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State of South Carolina

County of Anderson

In the Court of General Sessions

State of South Carolina,	)	
	)	
Plaintiff,	)	2015-GS-04-1175/01177
	)	
-vs-	)	
	)	November 19-20, 2015
Debra Lynne Sheridan,	)	
	)	
Defendant.	)	Transcript of Record
	)	

BEFORE:

The Honorable Scott Sprouse, Judge

APPEARANCES:

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(WHEREUPON, State's Exhibit Numbers 1 through 32 were marked for identification only.)

(WHEREUPON, court convened with all parties present, and the following proceedings were had commencing at approximately 9:11 a.m.)

THE COURT: All right. Good morning, gentlemen.

MR. TONEY: Good morning, Your Honor.

THE COURT: Is there anything before we bring the jury in? Have we marked all of our exhibits?

MR. MCLAIN: The State has, Your Honor.

THE COURT: Mr. Toney, have you had an opportunity to look at all of the exhibits?

MR. TONEY: I've looked at some of them. Obviously, we need to introduce each one in sequence.

THE COURT: All right. This is what we'll do. I'm going to get the jury in. This jury has not been sworn yet. And I will go ahead and give them my preliminary instructions. And I'm going to send the jury out to elect a foreperson. And Mr. Toney, you can review the State's proposed exhibits while they do that. And then we will ---

MR. TONEY: There will be a motion to suppress the evidence based on the search warrant.

THE COURT: Okay. Well, we'll deal with that after I send the jury out.

MR. TONEY: Sure.

THE COURT: Okay. Mr. Bailiff, if you'll get our jury for us, please, sir.

(WHEREUPON, the jury entered the open court at approximately 9:13 a.m.)

THE COURT: Who's our alternate juror?

THE CLERK: You're the alternate juror?

THE JUROR: I am.

THE CLERK: You need to change places with the gentleman in the red shirt.

(WHEREUPON, the jurors changed seats.)

THE COURT: Good morning, ladies and gentlemen.

THE JURORS: (In unison) Good morning.

THE COURT: I apologize for the delay this week. I know we've made you come back several days later. This has been an interesting week, needless to say, but we're ready to proceed on the case. And the first order of business will be for the clerk to swear you in as the jury in this case.

All right. Mr. Clerk?

(WHEREUPON, the jury was duly sworn.)

PRELIMINARY CHARGE

BY THE COURT:

All right. Ladies and gentlemen, before we start the trial, I'm going to give you some preliminary instructions. I'm going to explain our roles in the trial.

I am the judge of the law, and you will apply the law as I give it to you. You are the judges of the facts. As the judge of the facts, you have the duty to evaluate the evidence that is presented. Evidence is sworn testimony from the witness stand or any exhibits that have been entered into evidence. You, and you alone, determine the credibility of any witnesses that testify and how much weight to give their testimony.

Each attorney will have the opportunity to outline their positions and any evidence that he intends to present to support their claims. The attorneys will also have the opportunity to make a closing argument to you at the end. Keep in mind that the statements of the attorneys are not evidence but merely tools that they use to help you understand their respective positions.

The State has the burden of proof in this trial. It must prove beyond a reasonable doubt that the defendant is guilty of the offenses charged. If the State fails to meet that burden, then you must find the defendant not guilty. On the other hand, if the State does prove its cases beyond a reasonable doubt, then you must find the

defendant guilty.

The defendant is presumed innocent and has no burden of proof in this trial. You're going to get a more detailed definition later, but reasonable doubt is defined as a doubt that would cause a reasonable person to hesitate to act. And, again, you're going to hear more about that throughout the trial.

A few more things. This is not an endurance contest. We will take breaks as we go along. So if any juror gets in distress and you need to take a break, please let your bailiff know and we will accommodate you. We're not going to make you sit all day without taking a break.

Reiterating your preliminary instruction from Monday, there can't be any independent investigation of the facts or the law by any source: smart phones, internet, word of mouth. No independent research of any kind. You may not deliberate amongst yourselves when we take breaks. That means that you cannot discuss the case amongst yourselves until I instruct you to do so at the end. You can talk about anything you want to talk about in the jury room when we're taking breaks, but you can't deliberate about this case.

And, lastly, you cannot discuss the case with third parties. If we recess for lunch or you're out in the

hallway, these attorneys aren't going to talk to you. They're going to ignore you. It's not because they're trying to be rude, but it's because they know they can't talk to you. So keep that in mind. You can't discuss the case with third parties.

Now, one instruction I'm going to give you to start with also is that during the course of the trial, there may be objections. One attorney may object to something that the other attorney is seeking to present or some issue that comes up. It should not be interpreted that the Court favors one side or the other by a ruling an objection. The attorneys are simply doing their jobs to object. And my job is to ensure that each party receives a fair trial. So you should not interpret objections to mean that the Court favors one side or the other.

Also, there may be matters that have to be taken up outside of your presence. These are matters of law. This is not to hide things from you. It is merely to ensure that each party receives a fair trial.

So with that said, I'm going to ask you to return to the jury room for your first order of business. And that will be for you to elect a foreperson. This will be your presiding juror, the juror who will preside over your deliberations at the end. And this will also be the juror who communicates with the Court. If there are any

issues that arise, a note should be written by the foreperson to the Court.

So Mr. Bailiff, if you would take the jury back to the jury room. When you have elected a foreperson, please knock on the door and let the bailiff know.

(WHEREUPON, the jury exited the open court at approximately 1:19 p.m.)

THE COURT: Are there any exceptions to my preliminary instructions from the State?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Any exceptions from the Defense?

MR. TONEY: None, Your Honor.

THE COURT: All right. We will go in -- well, Mr. Toney, you have a motion. Let's go ahead and deal with your motion right now.

MR. TONEY: A couple of motions. The first one is the State has a lot of witnesses. They're all seated outside. They're all together. They have an opportunity -- I'm not saying they would -- but perhaps accidentally even to discuss the case with each other after their testimony and make sure their stories agree and give them unfair advantage. I think it's appropriate in a case like this that the witnesses be sequestered. In other words, once they obviously testify, they can't discuss the case with each other. And they should -- you know,

any witnesses who want to testify, they should have to remain outside. So this is a motion to sequester the witnesses.

THE COURT: Okay.

All right. Mr. McLain, do you have any objection to the witnesses being sequestered?

MR. MCLAIN: No, sir, Your Honor. Just I have told my witnesses not to speak with each other.

THE COURT: All right. Witnesses will be sequestered. And witnesses who have not testified would not be able to be in the courtroom or discuss their testimony with witnesses.

MR. TONEY: The next one is a motion to dismiss all the charges due to the lack of a search warrant. The State will stipulate there was no search warrant in this case, I believe. All the warrants say on their face -- and they will -- I believe they will admit that they came here due to a wellness check. This is what they say.

THE COURT: Uh-huh (affirmative).

MR. TONEY: There is no such right to a wellness check in the law. They came into a fenced yard. There were many officers. They brought trucks, and they basically just came in with no search warrant and began to search. And based on that, all charges should be dismissed.

THE COURT: All right.

Mr. McLain?

MR. MCLAIN: Your Honor, first of all, they did have -- the officers had a good-faith -- they had an agreement from previous charges that were being held basically in abeyance for a probationary-type period from magistrate court. In that agreement, it did say that during that eighteen-month period, they could from time to time check and make sure she wasn't mistreating dogs or keeping them in unsafe conditions. That agreement was put into effect on the 15th of -- the 13th of January of this year. Part of that agreement was that she relinquished a hundred and nineteen dogs that were in the care of PAWS. She did, in fact, relinquish those dogs to PAWS.

Two months later, my officers got a couple of anonymous tips. And they said, well, let's drive out there. They went out there, immediately saw a large number of animals. They smelled, you know, what they thought to be evidence that the living conditions were unacceptable. And, Your Honor, based on these arrests, the magistrate level charges were set for trial again because the magistrate prosecutor basically looked at it as a violation of the agreement.

It was set for trial in June of this year, June

23rd. And based on this agreement, the magistrate judge continued it, basically saying that there isn't a violation of the agreement. He acknowledged the agreement. There's not a violation of it because she doesn't have a conviction. So -- and I don't think Mr. Toney would argue that her case was continued in magistrate court based on this agreement. I think she's clearly benefitting from the agreement. And the agreement does say -- I do have a copy if the Court would like to see it.

THE COURT: Yeah, let me see a copy of it.

MR. TONEY: I would ask if he's going to show a copy to the Court he must introduce it.

THE COURT: Have you looked at it?

MR. TONEY: Yes, I have. And I deny that it's an agreement.

THE COURT: All right. Well, go ahead. Go ahead and mark it. Go ahead and mark it.

(WHEREUPON, State's Exhibit Number 33 was marked for identification only.)

THE COURT: All right. Mr. Toney?

MR. TONEY: Well, Your Honor, clearly this is not an agreement. An agreement under South Carolina law has to be between two or more parties. I think any agreement that's capable of being carried out more than

one year under the statute of frauds must be in writing.

Now, in this case, we have something signed by Thomas W. Dunaway, IV, and he's the only the person who has signed this. Nancy Devine, the Anderson County Chief Magistrate Judge, signed as the witness. My client did not sign this alleged agreement; therefore, there is no agreement. There is no meeting of the minds.

That doesn't even get into the meat of the so-called agreement. This agreement on page one of the agreement is what is -- by saying agreement, I'm not stipulating that it's an agreement. That's what it's titled. It says, "Debra Lynne Sheridan shall have until June 15th, 2016, to obtain legal permits to construct a seventy-five foot by seventy-five feet warehouse structure with concrete floors and proper drainage to operate an animal rescue organization with routine and random welfare checks to be conducted by the Anderson County Sheriff's Office or any other law enforcement agency with jurisdiction to ensure compliance with any and all state and county ordinances related to the care and treatment of animals." The phrase "with routine and random welfare checks" modifies the phrase "seventy-five feet by seventy-five feet warehouse structure." It plainly says, "Debra Lynne Sheridan shall have until June 15, 2016, to obtain legal permits to construct it." The agreement --

and it's just clear as the fact that there is a courtroom here today, the fact that the sun's in the sky, the fact that we're in the United States of American, this agreement says she has until 2016 to construct this facility with the routine checks. And the date today, I think, is November the 19th, 2015. Obviously, we're nine months away even now from this so-called agreement kicking in.

So the fact that this little ex-parte document, which is only signed by one party, if the State's relying on this -- which apparently they did. It's in every one of their warrants. It says, "we're here for a welfare check" in every one of these.

THE COURT: Well, let me stop you there.

Mr. McLain, was this a hearing? It looks like it was a -- it looked like the magistrate signed this as well.

MR. MCLAIN: Yes, Your Honor.

THE COURT: Was this in open court?

MR. MCLAIN: They had a hearing. And in magistrate court, they record their hearings with an audio recorder. And unfortunately, the audio recording malfunctioned. And I have spoken to Judge Devine about it.

THE COURT: Well, why didn't the solicitor's

office have the defendant sign the agreement?

MR. MCLAIN: It's my understanding that Mr. Toney would not allow his client to sign it.

MR. TONEY: Judge, that's not true that I wouldn't allow my client to sign it. The fact is my client did sign it. My client did not enter into this so-called agreement. And we deny the fact of the existence of an agreement. Every one of these warrants here today, Your Honor, every one of them says, "Animal was found during a court-ordered welfare check." I could read sixty or seventy of these for you, but they all say the same thing. "Animal was found during a court-ordered welfare check."

These officers have represented to the county and the state on scores of occasions that this was during a court-ordered welfare check. Every time they said it, they signed. It's an affiant. They have signed under oath on over maybe fifty, sixty occasions under oath, unless they committed perjury -- which I don't think they did -- that this was a court-ordered welfare check.

THE COURT: Well, Mr. Toney, you've got a document signed by a magistrate. It's titled agreement. But it appears to me that this was a hearing. And it appears to me the case was taken off the docket because of the provisions that were signed by the magistrate. So

I'm going to deny your motion. Again, your client's not on trial for violating the magistrate's court conditions. That's a different court. But I'm going to deny your motion to dismiss these indictments.

MR. TONEY: Yes, Your Honor.

THE COURT: And I will make this as a State's -- or let's -- what number is this? State's Exhibit Number 32?

COURT REPORTER: It's actually 33, Your Honor.

THE COURT: It's going to be 33?

COURT REPORTER: Yes, sir.

THE COURT: Has the jury ---

THE CLERK: Yes, sir. Juror number 168, Justin Seabrook, is your foreperson.

THE COURT: Okay.

MR. MCLAIN: Your Honor, did you want me to give Ivan Toney the pictures to make sure he had copies of them?

THE COURT: Yeah, let Mr. Toney look at the pictures before we get started.

COURT REPORTER: Is this going to be for ID only?

THE COURT: Yeah, that exhibit is for ID only at this point.

MR. TONEY: I am, at the appropriate time,

going to object to some of these pictures.

THE COURT: All right. Which ones do you -- let's pull out the ones you object to.

MR. TONEY: I hope I haven't gotten them out of sequence, Your Honor.

THE COURT: Mr. McLain, separate the ones that there are going to be problems.

MR. TONEY: Numbers -- State's Exhibits Number 18 through 27 are going to be problematic, Your Honor. We're going to object to those.

THE COURT: Okay.

MR. TONEY: I don't know when you want to be heard on that or when ---

THE COURT: We'll deal with that ---

MR. TONEY: Yes, sir.

THE COURT: --- when he seeks to lay his foundation to put them in.

MR. TONEY: Thank you, Your Honor.

THE COURT: So how many other exhibits? You have 1 through 17 no objection? All right. What are the numbers of the pictures?

MR. MCLAIN: The pictures are number 2 through 32.

THE COURT: All right. Well, let's -- they're marked. Let's put them in as they arise in your case.

All right. Anything further before we bring our jury back?

MR. MCLAIN: Nothing further, Your Honor.

(WHEREUPON, Court's Exhibit Number 1 was marked for identification only.)

THE COURT: All right. Mr. Bailiff, if you'll get our jury for us, please, sir.

(WHEREUPON, the jury entered the open court at approximately 9:34 a.m.)

THE COURT: All right. Mr. McLain?

MR. MCLAIN: May it please the Court, Your Honor.

THE COURT: Yes, sir.

OPENING STATEMENT

BY MR. MCLAIN:

Good morning, ladies and gentlemen. I know I introduced myself a couple of days ago. But my name is Austin McLain. I'm an assistant solicitor here in Anderson County for the Tenth Judicial Circuit. It's my job to prosecute criminal cases that occur within Anderson County.

And the case before you today is the State versus this defendant, Debra Lynne Sheridan. This all arose on March 18th of this year. Deputies with the Anderson County Sheriff's Office responded to Ms. Sheridan's

residence. And when pulling in the driveway, they immediately noticed an unusually large number of animals. Some of them were chained up. Some of them were caged. Most were living among piles of their own feces.

Now, as they stepped out of their vehicles that day, they immediately noticed a strong smell of ammonia, so strong they retrieved masks from the trunks of their cars before proceeding any further.

All in all, there were sixty animals found that day and seized, some with extreme hair loss, some with sores covering their bodies. Most not having access to food and water or clean sanitary living conditions.

The Judge told you earlier it's my job to prove guilt beyond a reasonable doubt. And that's absolutely true. The Judge will explain to you further exactly what reasonable doubt is. He'll go into detail later in the trial phase about the actual elements of each individual crime Ms. Sheridan is charged with. What I'd like to talk to you about this morning is what I intend to prove and how I intend to prove it.

Basically, I intend to prove to you that Ms. Sheridan's guilty of sixty counts of ill treatment of animals by depriving them of necessary sustenance and shelter. She's guilty of fifty-four counts of no proof of rabies for failing to have proper rabies

identification tags attached to fifty-four of the animals. And finally, she's guilty of possession of methamphetamine for, what it sounds like, possessing methamphetamine.

And to prove these things to you, I'll be showing you evidence through the trial process. Some of this evidence will be in the form of photographs of the scene that day, the conditions of the property that the dogs were living in. Some of the photographs will be of the dogs themselves, but the rest of the evidence will be testimony -- will be witnesses standing up here testifying to what they saw, what they smelled, what they heard when they were on scene that day.

You're also going to hear testimony from the vet who examined all sixty animals the day they were seized. This vet has continued to care for the animals over the past eight months and can testify as to the conditions of those animals.

And regarding the meth and the drug charge, you're going to hear from the officer who found the meth in Ms. Sheridan's pocket. And you're going to hear from a forensic chemist who will tell you about the chemical analysis performed on the substance that confirmed that it was, in fact, methamphetamine.

All I ask of you today is to listen to the testimony

presented, look at the evidence presented and use your common sense. At times, some of the testimony might seem redundant, but it's all important nonetheless. And if you use your common sense here today and at the close of evidence, I have no doubt you'll find the defendant guilty on all charges.

Thank you.

THE COURT: Mr. Toney?

OPENING STATEMENT

BY MR. TONEY:

Ladies and gentlemen, I appreciate your kind attention. As I stated before, my name is Ivan Toney. I represent Debra Sheridan. This is an important job for you because this is my client's life, and she has asked for this trial. And she has come before you, and she intends to present some evidence also.

I ask that you listen very carefully to what the State is going to say because my client has no burden of proof whatsoever. The State has to prove their case entirely. And that's only fair because they have lots of resources. They have lots of power. They come in here today. They've brought this case. They're the ones who intend to prove their case.

I ask that you hold their feet to the fire, that you look at all of their evidence, that you listen to it,

that you examine it very carefully.

In this case, Debra is a wonderful lady. She runs an animal rescue. She has placed -- and you will hear testimony that she has rescued and placed over five thousand dogs. This is over about fourteen or fifteen years. I don't understand how anybody can do it. I've had dogs before myself. I always thought one or two was fine, three or four was difficult. But she has gone out of her way to find every kind of stray animal that she can. She has rescued every dog that she can. She has gotten dogs from various animal shelters that were on the euthanasia list.

The evidence will show that she has cared for these dogs, taken donations on occasion, food, some money. But basically her case is going to show that -- we're going to show that she has devoted her life to these animals. She is not married. She has not had time for marriage because of these animals. She has no children. These dogs are like her children. She has put her heart, her soul, her passion into these animals.

You will hear the story about how she has placed these dogs up for adoption. She has found homes. She has driven across country on occasion to check on the quality of these homes. She has vetted the people that she's placed these dogs with as best as she can.

I understand the State is going to try to find flaws in her care. One aspect of this trial that I would ask you to focus in on is that the State will show that they have no manuals, procedures, policies, books, regulations on the care of an animal, on the proper conduct of an animal care facility. So when they say that she has failed to meet this or that standard, I want you to notice the fact that they will have no written standards, no policies, no procedures.

This lady has given her heart and soul for these dogs, and she wants to continue to try to help animals. Most of these animals that you see or many of them were due to be euthanized. She has gone out of her way to save and rescue them. People have thrown dogs over the fence, cats over the fence for her. I'm not saying that she asked them to throw dogs over the fence, but she'd wake up in the morning, and there would be dogs over the fence. She's just someone that loves animals.

I ask that you pay very close attention to all of the testimony and look at all of the evidence, and I thank you for your courtesy.

THE COURT: All right. Mr. McLain, call your first witness.

MR. MCLAIN: Your Honor, the State calls Lieutenant Joel Powell with the Anderson County Sheriff's

Office.

JOEL POWELL,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:

Q. Lieutenant Powell, would you tell the jury what you do for a living?

A. I work with the Anderson County Sheriff's Office Animal Control Division.

Q. Okay. And how long have you worked for the sheriff's office?

A. Going on five and a half years.

Q. Okay. And had you had previous law enforcement experience?

A. Yes. I started with Anderson County back in 1991, January.

Q. Okay. And you said you worked for the Animal Control Division. Has your prior time with Anderson County been in that division?

A. The majority of it included it. It evolved into several different things, but animal control started back -- probably back in the early '90s, and I was part of it back then.

Q. And what is your current position?

A. Lieutenant.

Q. And what do your duties involve?
A. I oversee all of the animal control officers.
Q. Okay. And how long have you been in that capacity?
A. Five and a half years.
Q. Five and a half years?
A. Yes, sir.
Q. So were you working in that capacity on March the 18th, 2015?
A. Yes, sir.
Q. And on that day, did you come in contact with the defendant, Ms. Sheridan?
A. I did.
Q. And can you explain to the jury how you came into contact with her that day?
A. Well, to start with, we had a call for service out at Ms. Sheridan's residence for a well-being check on some animals. And that was the time when we rode by and noticed the animals from the road. And we pulled in and met Ms. Sheridan there at the residence.
Q. Okay. And you said we. Can you explain that?
A. Yes. It was myself and one of the other officers, Officer Bruce. We went by, and then that's when I contacted all the others to be on standby just in case we needed them.
Q. And as you drove up to the residence, what did you

see?
A. Well, we noticed the animals out between the mobile homes.
MR. TONEY: Objection. He can only testify about what he has seen.
THE COURT: Rephrase your question, Mr. McLain.
Q. As you drove up to the house, what did you see?
A. As I was stating, we noticed the animals between the two mobile homes.
MR. TONEY: I'm going to only ask him to testify to what he has seen, not what other people have seen. Objection.
THE COURT: I will sustain the objection. Rephrase your question. Or ask your question again. I think you rephrased it.
Q. Specifically, what did you see? Not what anyone else ---
A. I noticed animals between the two residences outside in kennels.
Q. Okay. And what, if anything, did you do at that point?
A. At that point, that's when we entered the driveway, pulled up to the residence to inquire about the well-being of the animals.
Q. Okay. And the driveway, is that in a fenced-in

area?
A. No, sir.
Q. Okay. And did you step out of your car at that point in time?
A. Yes, sir.
Q. And what, if anything did you notice as you stepped out of your vehicle?
A. Well, as I stepped out, I noticed the dogs ran up to the back gate there at the fence. And you could smell a strong odor of feces and just a strong pungent odor coming from the back yard area.
Q. Okay. And what, if anything, did you do after that?
A. At that time, we proceeded inside the fence to go to the first residence to see if anyone was at home.
Q. Okay. And were you able to make contact with anybody?
A. Not at the first residence. When we left the first residence going on up to the second residence was when we contacted Ms. Sheridan.
Q. Okay. And what did you do after you made contact with Ms. Sheridan?
A. That's when we -- I proceeded to inspect the animals that were on the property.
Q. Okay. And at any point, did another officer show up?

A. Yes, sir. Officer Bruce was with me at that time.
Q. And was he the only one with you at that time?
A. The others were in route.
Q. Okay. I want to take a step back. When you got -- when you initially went out to the residence, what was the address of that residence?
A. I don't remember the house number. All I remember is Hamlin Road. Hamlin Road.
Q. Okay. And is that road within Anderson County?
A. Yes, it is.
Q. Lieutenant, I'm showing you what's been pre-marked for identification purposes State's Exhibit 3, 2, 32, 31, 30, 29, 28, 17, 16, 15, 14, 13, 12, 11, 10, 9, 8, 7, 6, 5, and 4. Can you look through those, please?
A. Yes, sir.
Q. Lieutenant Powell, do you recognize those?
A. I do.
Q. And what do you recognize those to be?
A. These are the animals that were located on the property and the condition that they were in.
Q. Were you present when those photographs were taken?
A. I was, yes, sir.
Q. And do those photographs fairly and accurately represent or reflect the conditions of the property located at 818 Hamlin Road on March 18th, 2015?

A. Yes, sir, they do.
Q. Lieutenant Powell, now I'm showing you State's Exhibit 18, 19, 20, 21, 22, 23, 24, 25, 26, and 27. Will you take a look at those?
A. Yes, sir.
Q. And Lieutenant Powell, do you recognize those?
A. I do.
Q. And what do you recognize those to be?
A. This is the conditions that the animals were living in as far as the first mobile home. And it also looks like the section between -- the fenced-in area has about three sections, and this one section is in the middle. There was a little storage-type building, and some of them were in there.
Q. And were you present when those photographs were taken?
A. Yes, sir.
Q. And do those photographs fairly and accurately reflect the conditions of the property at 818 Hamlin Road on March 18th, 2015?
A. They do.
MR. MCLAIN: Your Honor, the State would move to have State's Exhibit 2 through 32 moved into evidence.
MR. TONEY: I object.
THE COURT: Mr. Bailiff, would you take our

jury to the jury room, please, sir?

THE BAILIFF: (No response)

THE COURT: Mr. Bailiff, would you take our jury to the jury room, please?

(WHEREUPON, the jury exited the open court at approximately 9:53 a.m.)

THE COURT: All right. Mr. Toney, state your objection.

MR. TONEY: Your Honor, pictures number 18 through 27, to my recollection, show the interior of the mobile home which is on the property. That home is abandoned. There are no dogs living in that house. The house has been flooded. It's been that way for two years. She had some plans to remove that mobile home, but the dogs were not living in that home. Because they're not living in that home, because they didn't have access to that home, those pictures are irrelevant.

Not only are they irrelevant because it's an abandoned home, they're highly prejudicial. The pictures in and of themselves are completely irrelevant. The fact is though that even if the Court finds they're not completely irrelevant -- and I believe they are -- any probative value they may have, which we contend is nil, is outweighed by the prejudicial effect. Since this is not related to the dog charges, we believe they should be

excluded.

THE COURT: Okay.

Mr. McLain?

MR. MCLAIN: Well, Your Honor, first off, Lieutenant Powell just testified that some of the animals were found in those areas. And secondly, to say the dogs weren't in there, I mean, the pictures are of rooms covered in animal feces. So dogs had been in there, and the pictures proved that. I think it absolutely is relevant to the living conditions some of the dogs were living in. And I don't think the prejudice outweighs the probative value. I think they're extremely probative. Of course, they're prejudicial. Anything I put up is likely going to be prejudicial to his client. But I don't think the prejudicial value outweighs the probativeness of it.

THE COURT: All right.

MR. TONEY: Your Honor?

THE COURT: Yes, sir.

MR. TONEY: In brief response, we think some raccoons may have gotten in there. This house has been abandoned for two years. You're going to find things in abandoned homes. In this case, there's nothing tying these particular dogs -- and each warrant is tied to a particular dog -- to this house. So these are completely

irrelevant. They're so prejudicial and they're so outrageous that they have the potential really to taint the entire trial in my opinion.

THE COURT: All right. I am going to overrule your objection, Mr. Toney.

MR. TONEY: Yes, sir.

THE COURT: So, Mr. McLain ...

Mr. Bailiff, if you'd get our jury, please, sir.

(WHEREUPON, the jury entered the open court at approximately 9:58 a.m.)

MR. MCLAIN: Your Honor, just for the record, the State moves to have State's Exhibit 2 through 32 moved into evidence.

THE COURT: State's Exhibit 2 through 32 are admitted into evidence.

MR. TONEY: Objection, Your Honor.

THE COURT: Your objection is noted for the record, Mr. Toney.

MR. TONEY: Yes, sir.

(WHEREUPON, State's Exhibits Number 2 through 32 were admitted into evidence.)

MR. MCLAIN: Your Honor, at this time I'd like to publish Exhibits 2 through 32 to they jury.

THE COURT: Yes, sir.

DIRECT EXAMINATION

CONTINUED BY MR. MCLAIN:

Q. Lieutenant Powell, if you would -- Lieutenant Powell, I'm showing you what's been entered as State's Exhibit 4. Can you explain for the jury where on the property this was located?

A. It appears to be one of the kennels that's between the two mobile homes.

Q. Okay. And do you remember how many kennels there were?

A. Not the exact amount. There was a couple of dozen at least.

Q. Okay. Now I'm showing you what's been marked as State's Exhibit Number 5. And where is that located?

A. The same location.

Q. This is State's Exhibit Number 6. And where is that located?

A. Those are the kennels between the two mobile homes.

Q. I'm showing you now what's been marked as State's Exhibit Number 8. Can you explain to the jury where that is located on the property?

A. This is the back porch of the first mobile home when you come on the property.

Q. And do you remember how many dogs were found in that area?

A. Probably ten or twelve in that area.

Q. Okay. This is State's Exhibit Number 11. Can you explain to the jury where that was located?
A. If you're coming from the first mobile home toward the second mobile home, this is just there right between the two.
Q. Okay.
A. Between the first fenced-in area to the -- what I would say the second and third fenced area.
Q. And were there animals located in that area?
A. Yes.
Q. And did those animals have access to that yellow bucket?
A. Yes, they had access to it. Yes, sir.
Q. I'm showing you what's been marked as State's Exhibit Number 12. And where is that located?
A. That's the same bucket as previous.
Q. Do you know what was located -- what was inside that bucket?
A. My understanding it would be dog feces and muddy water.
Q. I'm showing you now State's Exhibit Number 15. Can you tell the jury where that kennel was located?
A. That's also one of the kennels in the back yard.
Q. Okay. This is State's Exhibit Number 16. Where is this located?

A. That's located on the back porch of the first mobile home.

Q. Okay. State's Exhibit Number 17. Can you tell us where these animals were found and located?

A. That one looks more like the storage area between the two mobile homes.

Q. Okay. When you say storage area, can you give a little bit more detail?

A. Well, if you come from the first mobile home, proceed towards the second one, this building's located between the two inside the -- from the larger first fence, then there's a small fence which includes this area. And then you go into the next mobile home area.

Q. Okay. This is State's Exhibit Number 32. Is this the same animal that is depicted in State's Exhibit Number 17?

A. Yes, sir, I believe so.

Q. And where was this animal found again?

A. They was inside the storage building.

Q. This is State's Exhibit Number 28. Can you explain to the jury where this location was?

A. That is inside that storage area as you go in and back to the right in that little area.

Q. And how many dogs were located in that area to the best of your knowledge?

A. Probably about ten in that area.
Q. I'm showing you now State's Exhibit Number 30. Is this the same animal as depicted in State's Exhibit 28?
A. Pardon me? Excuse me?
Q. Is this -- this is State's Exhibit Number 30. Is this the same animal that was depicted in the previous picture, State's Exhibit Number ---
A. Yes, it is.
Q. This is State's Exhibit Number 3. Can you explain to the jury where this is located?
A. This is the section behind the second mobile home in the back.
Q. Okay.
A. Back corner.
Q. This is State's Exhibit Number 26. Can you tell the jury where this was located?
A. That appears to be back in the storage building area.
Q. Okay. And State's Exhibit Number 27?
A. The same area.
Q. And where at? Where was that?
A. In the storage building area.
Q. And were there animals located inside the storage building?
A. Yes, sir.

Q. This is State's Exhibit Number 25. Will you explain to the jury where this was located?
A. This is located back in the first mobile home.
Q. And were there animals located inside this mobile home?
A. Yes, there was.
Q. Was there feces located inside this mobile home?
A. Yes, there was.
Q. This is State's Exhibit Number 24. Where is this located?
A. In the first mobile home.
Q. And were there animals located in the vicinity?
A. Yes, sir.
Q. This is State's Exhibit Number 22. Can you tell the jury where this was located?
A. If I ain't mistaken, that's in that first mobile home also as you first enter toward the back. Back to the right maybe.
Q. And were there dogs found in this area?
A. Yes, sir.
Q. This is State's Exhibit Number 20. Can you tell the jury where this is?
A. If I remember correctly, that's still going to be in the mobile home.
Q. And were there dogs located in this area?

A. Yes, sir.
Q. This is State's Exhibit Number 18. Where was that located?
A. That's the first mobile home.
Q. And were dogs located in that area?
A. Yes, sir.
Q. Lieutenant Powell, at what point in time did you make a decision to seize the animals?
A. I think it was when we went through into the storage area. We knew then that we were going to be taking all the animals.
Q. Okay. And what is the process for doing that?
A. It's just the totality of the whole ---
Q. Let me stop you right there.
A. Sure.
Q. What is the actual physical process of seizing the animals and taking them?
A. We just let Ms. Sheridan know that we would be taking her animals today.
Q. Okay. At that point in time, was she placed under arrest?
A. She was.
Q. I have no further questions. If you'll answer any questions Mr. Toney has.
THE COURT: Mr. Toney?

MR. TONEY: Thank you, sir.

CROSS-EXAMINATION

BY MR. TONEY:

Q. Lieutenant Powell, do you have a book or a manual on how to run a rescue facility or for the care of dogs?

A. Do I have a book? No, sir.

Q. Does Anderson County have such a book?

A. No, sir.

Q. Is there a license or a set of certifications you get to run any kind of rescue or to keep animals in Anderson County?

A. No, sir.

Q. Is there any training?

A. Training for?

Q. Regarding the care of animals in Anderson County or anything like that. Any official training?

A. Yes. Well, just going by what the law states.

Q. Okay. But you don't have any specific rules as to care and feeding of animals, do you?

A. Well, it all depends on how you're phrasing that. We understand the fact ---

Q. Let me clarify it then, if I could.

A. Okay.

Q. Do you have specific rules on when you clean up animal waste?

A. It probably doesn't have a time frame on it, but it states in our laws that they have to have sufficient food, water and shelter and clean facilities to live in.

Q. So, in other words, there's no specific rules on animal waste; correct?

A. Probably not.

Q. What about how many times you have to clean the cages? There's no specific rules on that; correct?

A. Nothing specific.

Q. What about the size of the cages?

A. No, sir, no standard size.

Q. What about the composition of the cages?

A. No, sir.

Q. And so you don't have any specific rules on what's the right way to do things and the wrong way to do things?

A. It's basically like life. Common sense on most of it.

Q. Now, have you been out to the PAWS facility?

A. Yes, sir.

Q. And how many times have you been there?

A. Several hundred probably.

Q. Inside the -- and PAWS is run by Anderson County; right? It's the humane society, the dog facility, cat facility?

A. Anderson County, yes.
Q. Okay. The animals in there, none of them ever have dog tags on them inside the facility because they can get hung up on the cages; correct?
A. They have identification.
Q. They don't have tags on them, do they?
A. No. It's a collar is what they have on.
Q. But they don't have their tags on them, do they?
A. No, sir.
Q. And that's because they can get caught up in the cages; correct?
A. Yes, sir.
Q. Okay. And that's a safety concern?
A. Sure.
Q. How much -- does it state specifically -- you don't have any regulations of how much food or how often a dog is supposed to be fed in a day; correct?
A. I would say -- and this is our opinion because this is what we go by. They need to have access to that when they're in a kennel.
Q. Now, you have snapshots of some of the dogs. One of the dog's missing hair; correct?
A. Yes, sir.
Q. Now, for example, when Anderson County takes in dogs, sometimes those dogs have health problems; correct?

A. Of course. Yes, sir.
Q. As a matter of fact, many times they have health problems; correct?
A. A pretty good bit, yes, sir.
Q. How many dogs does Anderson County take in every year?
A. I couldn't even tell you that. I don't keep those records.
Q. In the thousands at least; correct?
A. Probably so.
Q. Maybe even several thousand a year?
A. Yes, sir.
Q. Some are kept alive and nursed back to health?
A. Yes, sir.
Q. Some are euthanized?
A. Yes, sir.
Q. Some are adopted out; correct?
A. Yes, sir.
Q. And you have procedures for all of those; correct?
A. Exactly.
Q. And dogs are taken in for various health reasons; those health reasons can be any kind of health reasons that pertain to animals? Anything ---
A. Typically.
Q. Anything that could be unhealthy for that animal,

you might find at least on occasion ---
A. Sure.
Q. --- in the animal facility for Anderson County; correct?
A. Yes, sir.
Q. Just like in a hospital, you're going to find some people with heart problems, some people with skin disease, some people with bullet wounds, some people with broken legs, every kind in the Anderson Area Medical Center?
A. Yes, sir.
Q. So you understand that Ms. Sheridan runs an animal facility or rescue; correct?
A. Yes, sir.
Q. And she takes in dogs; correct?
A. Yes, sir.
Q. And she may not kill the dogs in precisely the same way that Anderson County does; correct?
A. I'm sure.
Q. So she may keep a dog alive longer than Anderson County perhaps deems appropriate; correct?
A. I wouldn't know.
Q. Or shorter? But she has -- there's no specific guidelines on when to euthanize a dog and when not; correct?

A. Nothing specific unless you've got a vet. I mean, if you've got a vet advising you as to how to handle them, that's what we go by.

Q. I mean, you can have a dog that's in bad health, and you can be trying to keep it alive, but there can be different points of view as to how long that animal should be kept alive; correct?

A. There again, I refer back to the vet care. As long as it's under vet care, that's what we -- that's our standard.

Q. Let me give you a for instance. When people get old, some people think that they should have unlimited medical care; some people think, well, just let them die. And these are individual-type decisions; correct?

A. I would guess so.

Q. All right. And there's different -- sort of like different strokes for different folks. It's not one set of standards; correct?

A. As long as it's humane.

Q. Okay. Some people try to keep people alive a lot longer than other people feel they should be kept alive; correct?

A. I don't know.

Q. The only one I can think of off of the top of my head is like that Terry Schiavo case in Florida. But

there's different cases that you hear in the news where -- I mean, you're aware of this. You're a police officer since the '90s; correct?

A. Yes, sir.

Q. You read newspapers, you keep up on events; correct?

A. Of course.

Q. You hear about cases where someone is on life support or someone's healthy or unhealthy and there's a debate over when that person should be left to die, what they want, and how long they want to stay alive. These are common sort of debates; correct?

A. Yes, sir.

Q. All right, sir. In Anderson County I read -- how many dogs do they euthanize a year?

A. I don't know.

Q. I read last week that the week before they had euthanized a hundred and thirty-five dogs.

MR. MCLAIN: Your Honor, Mr. Toney is testifying.

THE COURT: Yeah.

MR. TONEY: Well ---

THE COURT: Sustained.

Mr. Toney, direct the witness in the form of a question.

MR. TONEY: I did intend to ask a question.

THE COURT: Well, rephrase your question.

MR. TONEY: I'll rephrase.

THE COURT: Rephrase your question.

MR. TONEY: Yes, sir.

Q. On occasion, Anderson County will euthanize a large number of dogs; correct?

A. I guess so.

Q. Maybe ten, maybe twenty on occasion, even up to a hundred or thereabouts?

A. I'm not aware of that many, but ...

Q. Okay. But it's safe to say that they euthanize hundreds every year; correct?

A. I'm sure we do.

Q. And they have an incinerator on the side of the facility; correct?

A. Yes, sir.

Q. And they make judgment calls as to how long they wish to care for these animals; correct?

A. When you state they, the vet ---

Q. The facility?

A. The vet ...

Q. So -- but different people can have different judgments as to how long they wish for an animal to be cared for; correct?

A. I'm sure they do. That's why we're here.

Q. All right. And the presence of skin disease, for instance, on a dog doesn't necessarily indicate at all whether that dog's receiving treatment or not, does it?
A. No, sir. Your paperwork would be able to tell that.
Q. It's interesting that you mention that. I received these medical records from Anderson County, from PAWS. Are these the medical records concerning these particular dogs?
A. I don't fill these out. I don't know what they represent.
MR. MCLAIN: Your Honor, I don't know if -- he can't testify to that.
THE COURT: Well, he just testified he can't identify them, so ...
Q. You say you depend on the vet to determine whether the dog's in good condition or not; correct?
A. To a point, yes, sir.
Q. You don't -- you're not the vet in this case; correct?
A. That's exactly right. I'm not.
Q. So you would rely on a vet to make the determination if a dog's in good condition?
A. Exactly.
Q. Now, Ms. Sheridan had cages in this facility; correct?

A. Yes, sir.
Q. Did all the cages have roofs on them?
A. Yes, sir.
Q. And some of them had dog houses in them, correct?
A. Yes, sir.
Q. So they had double roofs?
A. Sure.
Q. And there was water, clean water, in the facility; correct?
A. For a couple of them.
Q. Dogs don't have to be inside. They can be kept in cages; correct?
A. Yes, sir. That's right.
Q. And all over Anderson County, people have dogs that are outside and some dogs that are inside; correct?
A. Yes, sir.
Q. As a matter of fact, we would call them outside dogs and inside dogs. That's just the slang; correct?
A. Right. Yes, sir.
Q. There's no requirement that -- in the law that someone have an inside facility; correct?
A. To have a what, now?
Q. An inside facility? A building? So it could be cages. It could be roofs. It could be anything like that?

A. As long as it's got a roof and three sides on it.
Q. How many people came with you to this arrest or this scene?
A. How many total ended up there or ---
Q. Yeah. How many people initially came in?
A. Initially, it was two.
Q. And you put everybody else on standby; correct?
A. Yes, sir.
Q. Immediately; correct?
A. Not immediately, no, sir.
Q. Was the media there?
A. The media?
Q. Yeah.
A. After -- just about after we were done confiscating the animals, the media was there.
Q. Weren't there helicopters over ---
A. Yes, sir. Yes, sir. But where they come from, I don't know.
Q. You don't know where they came from?
A. No, sir.
Q. They just showed up? No one from your office called the helicopters?
A. Nobody from my office that I know of called them.
Q. Do y'all use a system of -- that logs in phone calls to Anderson County called CAD detail?

A. Yes, sir.
Q. Is this the log from the Anderson County, sir?
A. Yes, sir.
MR. TONEY: I move to introduce this as Defense Exhibit Number 1.
THE COURT: Any objection?
MR. MCLAIN: I don't know what date it's from.
THE COURT: Have you looked at it?
Let Mr. McLain look at it.
MR. TONEY: He gave it to me, Your Honor. So this is what he gave to me.
MR. MCLAIN: NO objection, Your Honor.
THE COURT: Okay. Defendant's Exhibit Number 1 will be admitted without objection.
Q. This is the -- I'm sorry. I beg your pardon.
(WHEREUPON, Defendant's Exhibit Number 1 was marked and admitted into evidence.)
Q. Sir, this is the log from Anderson County Sheriff's Office describing the time line of calls from dispatch time and on route times regarding this arrest; correct?
A. Yes, sir.
Q. And there was a call placed in there at ten twenty for a welfare check court-ordered; correct? I believe this is on the first page. I beg your pardon.
A. That's what it states, yes, sir.

Q. And then this is at ten twenty point twenty-five. So ten twenty in the morning; correct?
A. Yes, sir.
Q. And twenty-five seconds a.m.?
A. Yes, sir.
Q. So this was ordered, and this was called in at ten twenty in the morning; correct?
A. Yes, sir.
Q. Is that called in as you're on your way or as you're there? When is that made?
A. It was probably on the way.
Q. So once you get there -- there's a call made by you at ten forty-one a.m., Agent 10, Lieutenant Powell -- that's you; correct?
A. It is me, yes, sir.
Q. --- requesting transport unit to take one to A.C.D.C. and forensic unit; is that correct?
A. Yes, sir.
Q. So you called in on the way for a welfare check, and by ten forty-one, you were already calling the transport unit. I don't know what you'd call it. Maybe a paddy wagon?
A. It's what it said. It's a transport unit.
Q. Transport unit?
A. Yes, sir.

Q. It does indeed say a little above there, on route time is ten twenty, and your on-scene time is ten twenty; correct?

A. (No verbal response)

Q. This is in the box, the second box from the top. So you were ---

A. Okay. Yes, sir.

Q. Okay. And then all these other folks were dispatched later; correct? Shortly thereafter?

A. (No verbal response)

Q. Request to come? All these other officers?

A. Yes. That's the way they do it now.

Q. Dispatch ---

A. Dispatch, and that's when they were there.

Q. Yes, sir. A lot of these people were dispatched -- like this third page here. Jamie Doyle? Who's Jamie Doyle?

A. One of my officers.

Q. At ten twenty, the same time you were on route; correct?

A. That's what it says, yes, sir.

Q. And then Michelle Smith also at ten twenty; correct?

A. Yes, sir.

Q. Jerry Bruce, ten twenty; correct?

A. Yes, sir.

Q. So really on route at least four officers that I can see were called?
A. Yes, sir.
Q. You mentioned there was a strong odor of ammonia, I think, or urine?
A. I hadn't stated that at that time. But feces, yes, sir.
Q. Okay. A person might object to the smell at a certain location. For example, if we smell something in here, we might find that objectionable; correct?
A. Sure.
Q. But whether a dog objects to the smell is another matter; correct?
A. (No verbal response)
Q. What's objectionable to a person versus to a dog is two different things; correct?
A. Well, I'm not being smart. I just never smelled the way a dog smells.
Q. That's right. So we don't know what a dog finds objectionable versus what a human might find objectionable?
A. Exactly. That's what we go by, what we're finding objectionable.
Q. For example, dogs don't like to smell apples, for example; correct?

A. I don't know.
Q. That's what I've heard. That's ---
A. Okay. I haven't heard that.
Q. So there's different smells that dogs don't like that people may not find objectionable and vice versa?
A. You're asking a question on that?
Q. Is that correct?
A. I have no idea.
Q. Ammonia is in urine; correct?
A. Yes. After it sits a while, yes.
Q. It's also in common cleaning products; correct?
A. Yes, sir, that's right.
Q. The smell of ammonia is not regulated by any particular regulations, is it?
A. No, sir. Let me go through these pictures.
Q. There's a mobile home situated in the middle of this facility; correct?
A. (No verbal response)
Q. There's a mobile home, an abandoned mobile home; correct?
A. I don't remember an abandoned mobile home.
Q. Just one second. There's a single-wide trailer on this property; correct?
A. (No verbal response)
Q. A single-wide and a double-wide, and this is a

single wide?
A. The first one, I think, is a single-wide.
Q. Yes, sir.
A. Yeah.
Q. And some of these pictures -- I thought I had them in order.
MR. TONEY: Excuse me, Your Honor. I have to -- they've been placed in a different order.
Q. I'm handing you pictures 18 through 27. These represent what you testified, I believe -- and correct me if I'm wrong, please -- to be the mobile home when you enter the premises?
A. I believe this was the storage building.
Q. Okay. Sorry about that.
A. Now, this one would be the mobile home. Storage building, mobile home, mobile home, mobile home, mobile home, mobile home, mobile home, and mobile home.
Q. The mobile home pictures ---
A. Okay.
Q. Let me have these for a second. Okay. Sorry about that. Did you see any dogs in the mobile home?
A. Yes, sir.
Q. When you came, did you enter that mobile home?
A. At first, when we came up to the mobile home, I knocked on the mobile home.

Q. Okay.
A. There was no answer. So I left that mobile home and proceeded to the second mobile home. And that's when we made contact with Ms. Sheridan.
Q. So you, yourself, did not open the mobile home?
A. No, sir.
Q. So you, yourself, did not see whether or not there were any dogs in it at that time?
A. At that time, no, sir.
Q. All right. You would accept the fact that if there were no dogs in that home on that day, that that's not particularly relevant to this case; correct?
A. If there were what?
Q. If there were no dogs ---
A. If there were no dogs, right. Right.
Q. --- in this trailer. That's a big if. It's not been determined yet?
A. Right.
Q. The jury must determine that.
MR. TONEY: I don't need the lights turned out, Your Honor.
Q. This is the Exhibit Number 2. What does that show?
A. That shows the entrance of the rear of the property.
Q. The dogs in there, the ones you could see in there, have access; correct?

A. Access to what?
Q. They have room to move?
A. Sure. Yes, sir. Yes, sir.
Q. This is when you're approaching it?
A. Yes, sir.
Q. So you were taking pictures even on your approach; correct?
A. Yes.
Q. But you don't see any signs of animal neglect or abuse in this picture, do you?
A. I can't tell from -- by that picture at this moment.
Q. All right. That's Exhibit 2. This is Exhibit 3. What's that picture?
A. From what I can tell, it's a dog chained out at the back fence.
Q. There's a little dog house?
A. Yes, it is.
Q. Everything looks pretty reasonably clean around that dog house, doesn't it?
A. All I see is dirt from here.
Q. It's all right for a dog to sit in the dirt; is that correct?
A. Sure. Yes, sir.
Q. And the dog's on a chain?
A. Yes, sir. Looks like it.

Q. So there's nothing particularly wrong with this picture, is there?
A. There's no water.
Q. That bucket is a water bucket; correct?
A. Could be.
Q. Could be?
A. Could be.
Q. Now, when y'all came, the dogs were excited; correct?
A. Sure.
Q. And y'all are strangers, and dogs get excited when strangers come, especially ---
A. I imagine so.
Q. And in this case, this dog could easily have knocked over a water bucket; correct?
A. That's correct. But it would be a water spot there if he had.
Q. Now, if the medical records, the veterinary records, show that this dog was in good condition, then you would accept those veterinary records, wouldn't you?
A. As far as the condition of the dog from the vet, but not the condition of it as it stands right there.
Q. All right. But you don't know if that dog knocked that over? And you can't see behind that bucket in that picture, can you?

A. Probably not by that picture. But I promise you I walked up to that dog, and there was no water in that bucket.
Q. But you can't see it from the evidence you have here today?
A. From the picture, no, sir.
Q. I'm putting up here -- I'm not very good with these pictures. This is Exhibit 4, which has already been introduced, Officer Powell. Can you see it?
A. Yes, sir.
Q. This dog here, there's some food there; correct?
A. Yes, sir.
Q. My client is going to testify that she cleaned this cage up the day before. Does that sound reasonable to you?
A. If that's what she says.
Q. Yes, sir. Just so I don't forget anything, this is just another picture of exhibit -- the same cage, the same dog; correct? Exhibit 5?
A. The same space, yes, sir.
Q. This is Exhibit 5. This is another dog in a cage; correct?
A. Yes, sir.
Q. And if Debra says that she cleaned the cage out the day before and she just hadn't gotten around to cleaning

the cage out that morning yet, you would accept that; correct?

A. I would accept that as her statement as cleaning it out. I don't know that.

Q. Okay. And there's a water bucket in there; correct?

A. Yes, there appears to be a water bucket.

Q. All right. And there's a roof on that cage?

A. There's a roof.

Q. And this is not a wooden floor. This is composite deck; correct?

A. That's right.

Q. That's expensive boards; correct?

A. Yes, sir.

Q. All right. And the cage doesn't look rusty. It looks -- it's nice; correct? I mean, I wouldn't want to live in it.

A. Well, I wouldn't either.

Q. A dog might though; right?

A. Well, he's having to.

Q. Okay. I understand. And they have cages down at PAWS; correct?

A. They do, with three sides on it.

Q. Some of these may be out of order. This is the back view of the mobile home?

A. Yes, sir.

Q. And these dogs were sitting there looking at you?
A. Yes, sir.
Q. And they -- they look like they're curious and well nourished, don't they?
A. No, sir.
Q. They don't? In what way?
A. Well, you can't tell by that picture, but my knowledge of the dogs when we walked up on them, those are the ones that were having hair loss issues.
Q. And as you said, the dog could have hair loss issues when it comes into the facility; correct?
A. That's correct.
Q. And you can treat a dog for hair loss and it can still have hair loss; correct?
A. That's correct.
Q. For example, my dad has lots of hair, and my granddaddy had no hair.
A. Uh-huh (affirmative).
Q. And that doesn't mean that either one of them is healthy or unhealthy; correct?
A. No, sir.
Q. The presence of a lot of hair or hair loss doesn't necessarily indicate the dog isn't being taken care of?
A. We associate hair loss as a problem ...
Q. That's something ---

A. ... within the animal force.
Q. That's something you look at; correct?
A. Yes, sir.
Q. But it's not dispositive of the issue?
A. It's not what?
Q. Dispositive. It's not the final call?
A. Right.
Q. Now, you went on the back porch; correct?
A. Yes, sir.
Q. And once you went on there -- who went on the back porch first?
A. Myself.
Q. Yourself? And you left the gate open; correct?
A. No. The gate was already open.
Q. The gate was already open?
A. Yes, sir.
Q. The dogs move in and move out of there. Dogs are mobile; correct?
A. Right. Yes, sir.
Q. Any picture that you take one minute may not be representative of the location of the dogs even one minute later; correct?
A. That's correct.
Q. And you were there several hours that day; correct?
A. Yes, sir, we were.

Q. So when you take a picture -- some of these dogs may have followed you, are curious; correct?
A. Some did, no doubt.
Q. All right. I noticed in the first picture there were racks of dog houses stacked up; correct?
A. Pardon?
Q. In one of the first pictures, there were racks -- piles of -- a stack of dog houses stacked up?
A. It seems like it was right there at the front when you first come in.
Q. And there are also some little houses underneath the porch; correct?
A. Yes, sir.
Q. These obviously weren't being used; correct? They were just the roofs; correct?
A. I have no idea if she was using those for a house or what.
Q. So for all you know, they could have been just stored there; correct?
A. Could have been, yes, sir.
Q. And there's one bucket in the buckets that's a different color than all these buckets; correct?
A. Yes, sir.
Q. That's the yellow bucket; right?
A. Yes, sir.

Q. And that bucket, coincidentally, has poop in it instead of water; correct?
A. That's what it appeared to me.
Q. Just like little children's song, one of these things is not like the other; right?
A. Could be.
Q. So it's reasonable to assume that the purpose of this bucket was not for water but for poop; correct?
A. (No verbal response)
Q. And I apologize for using the term poop, but ---
A. That's okay. I'm used to that.
Q. --- I guess I should say dog feces.
A. I hear it different ways.
Q. Yes, sir. I'm not trying to use profanity in any way.
A. I just don't understand why we'd have a bucket of poop where all the dogs can get to it.
Q. The dogs are not necessarily going to eat poop out of a bucket, are they?
A. I would hope not.
Q. Okay.
A. But if they get hungry enough, they will.
Q. There's no indication that these dogs were hungry?
A. No. No, sir.
Q. And this is the dog -- this is Number 13. This is a

dog outside the puppy house; correct?
A. Yes, sir.
Q. And he or she's just laying there, just laying around; correct?
A. That's about all it does the whole time we were there, yes, sir.
Q. All right. Okay. This is Exhibit 14. This is a row of cages; correct?
A. Yes, sir.
Q. And there's several. There's not just one cage; there's ---
A. Several of them, yes, sir.
Q. --- cage after cage; correct?
A. Yes, sir.
Q. And they have dog houses in them; correct?
A. Yes, sir.
Q. And the door's on there, and there's buckets; correct?
A. Yes, sir.
Q. So the dogs have a roof, a cage and a bucket?
A. Had a bucket, yes, sir. Empty.
Q. There's not an excessive amount of poop in that cage, is there?
A. To me, that's excessive.
Q. You don't have any standards as to what's excessive

and what's not. You don't have any written standards, do you?

A. There again, we use common sense.

Q. And this is the composite flooring, once again, expensive?

A. I believe so on those, yes, sir.

Q. And that's off the ground; right?

A. Yes, sir. Yes, sir, it is.

Q. So that stops -- that airs out underneath; correct?

A. It does what?

Q. By putting it off the ground, you reduce moisture and eliminate mold and issues like that; correct?

A. I don't know about that.

Q. Well, just like -- just like you live in a house. And I'm sure that house is right -- not on the ground. I'm sure it's probably a little bit off the ground?

A. Yeah.

Q. May -- some houses have some crawl space; some have just a little bit. But they all are off the ground; correct?

A. Yes, sir.

Q. Unless it's a basement?

A. Yes, sir.

Q. Which in some cases the basement is right on the ground?

A. Right.
Q. But basements is where you get moisture problems usually; correct?
A. I would think so.
Q. And the actual house itself, as long as it's off the ground, is not going to have a moisture problem unless it's in a bad area?
A. The only moisture I would see there if it was raining.
Q. Okay. But since it's off the ground, the rain will drain; correct?
A. I'm sure it would after the rain had left.
Q. I'll withdraw that question.
A. Yeah.
Q. I think that's a little cumulative.
This is Exhibit 15. And this is the -- this is the corner shot, the same picture we just looked at, I believe. This dog here had a house in a cage; correct?
A. Yes, sir.
Q. And a bucket; correct?
A. Yes, sir.
Q. And if the vet report comes back that this dog is in good condition, you would accept that vet report; correct?
A. As far as the condition of the dog, but the

condition of the living space of the dog, I've still got a problem.

Q. This is in the morning when you did this check or raid or whatever you want to call it; correct?

A. It was a check. Yes, sir.

Q. And you accept that she maybe hadn't had time to clean out the cages that particular day; correct?

A. That day. Exactly. Yes, sir.

Q. All right. But she could have easily cleaned them out the day before; correct?

A. I wouldn't think so, not with that much poop.

Q. But you don't know that, do you?

A. I don't know what she feeds her animals or what. So, no, I can't testify that a dog would poop fifteen or twenty times a day, but it's not normal.

Q. This is a bed inside the -- what she calls the puppy house; correct?

A. Is that the one I refer to as the storage building? That'd be correct.

Q. I'm not sure.

THE DEFENDANT: Yes, it is.

Q. Yes, it is, sir.

A. Okay. Yes, sir.

Q. And this has an infrared heat system in it?

A. Has a what?

Q. This has heating and air, this particular building?
A. I don't know.
Q. Would you be surprised to learn that that's infrared heat?
A. I wouldn't be surprised at all.
Q. And those are expensive systems; correct?
A. I don't know.
Q. Would you be surprised if I told you it cost upwards of thirty thousand dollars for the infrared heat in that building?
A. If you say so.
Q. And they're sitting in a little bed; correct?
A. Appears to be.
Q. There's nothing wrong with that little bed, is there?
A. Pardon?
Q. There's nothing wrong with that little bed, is there?
A. No, sir.
Q. All right.
A. Not with the bed.
Q. This is the other side of the same building that you refer to as a storage building, and I call it the puppy building, I think.
A. Okay.

Q. I'm not sure where either one of them are, where it is. You've been there. But that's where the puppies were; correct?
A. Some of them, yes.
Q. And puppies poop a fair amount; correct?
A. Probably so.
Q. It looks like maybe one day's worth of poop in there, maybe a little less; correct?
A. I wouldn't say that.
Q. You don't know though; do you?
A. I wouldn't say that.
Q. There was six puppies and a mom in there; correct?
A. I do not remember the total number.
Q. And they have a nice big tray of food there; correct?
A. They do.
Q. Dog food? Does the food look clean and good?
A. I don't remember that.
Q. This is another shot. This is Exhibit 29. Correct me if I'm wrong, please. But I believe that's the same area, same bowl of food?
A. Appears to be.
Q. And there's a bucket of water; correct?
A. It looks empty to me. Are you talking about the one at the front?

Q. Yeah.
A. Yeah, it looks empty to me.
Q. Okay. If you look right there, if you look closer, you can even see the water level right here, can't you?
A. There is a stain there. And I don't remember if there was water in that particular bucket or not.
Q. You don't remember? Perhaps you can't see the water level as clearly as you might because the water's so nice and clean; right?
A. Or stained. I don't know.
Q. So you don't know?
A. The bucket may be stained, you know. It could be clean water, sure.
Q. All right.
A. I just don't remember on that.
Q. Now, this dog here looks terrible; right?
A. In my opinion, he does, yes, sir.
Q. Just like if you go into a hospice or an old folks home, you'll see people that, if you were inclined to think that way, you'd swear they should maybe be put down; correct?
A. I don't know about that. But I'd love to see some vet records on that puppy or that dog.
Q. Would it surprise you if I told you that that dog's had ten thousand dollars worth of treatment?

A. It would very much surprise me because it's not working.
Q. And sometimes treatment doesn't work, does it?
A. I can't affirm that.
Q. Okay. Is it possible that Debra Sheridan is very soft-hearted and doesn't want to put down a dog that's had ---
MR. MCLAIN: Your Honor, there's no way he can testify to feelings.
THE COURT: Sustained.
MR. TONEY: Excuse me, Your Honor, just one second. There's a lot of pictures here.
Q. This picture here is in the office area; correct?
A. (No verbal response)
Q. Correct?
A. What's the office area?
Q. I'm just referring to that. I'm not sure. It's in the ---
A. If that's the office -- I don't know if that -- I just don't know.
Q. It's behind the closed door on the upper level; is that correct?
A. Could be.
Q. Y'all opened that door; correct?
A. If we went in the building and there was a door,

yes, we opened it.
Q. There's no dogs in there, but there's some cat food; correct?
A. That looks like a dog right there to me.
Q. There were no dogs in there initially when you opened it; correct? There's some cat food though?
A. To the best of my memory, yes, that dog was in there.
Q. There's some cat food though; correct?
A. I see a tray of food, yes, sir.
Q. It's got the round like -- almost like the breakfast cereal, the round cat food look about it; is that correct? The little circles? I'm not up on all of this. I'm ---
A. And I'm not getting where you're pointing at.
Q. That's for cats; correct?
A. Oh, I don't know.
Q. All right. And this is the same dog that was laying in the dog bed in one of the earlier pictures a few pictures ago; correct?
A. I don't know if that's the same one or not.
Q. It could be; correct?
A. I'm sure it could be.
Q. And this is the dog in the one area.
A. Okay.

Q. And that's the same dog there; right?
A. Could be.
Q. I mean ---
A. I mean, I'm not saying it is. There were so many animals, you know, I don't know. Could be.
Q. I can't tell them apart either, but one was pretty similar to the other one; correct?
A. Yes, sir.
Q. As a matter of fact, they don't look similar, they look identical; correct?
A. Looks pretty close.
Q. Because the dogs move around; right?
A. Yes, sir.

MR. TONEY: Sir, Mr. Bailiff, the light could probably be placed on.

THE COURT: Mr. Bailiff, if we could get our lights back on, please, sir.

Q. When you remove dogs from the house, you use catch poles; correct?
A. The majority of the time, yes, sir.
Q. What is a catch pole?
A. It's a safety device for an officer to remove an animal.
Q. What does it look like?
A. They are about six foot long with a loop on one end

and a tension on the other end to where you can draw it tight.

Q. Do dogs sometimes -- maybe some dogs are traumatized by them, some dogs aren't; correct?

A. Oh, sure.

Q. And it's disruptive at the very least, correct, to the dogs? They're not happy about it?

A. Yes. It's a safety issue for the officers. Now, what the dog feels, I don't know.

Q. Yeah. Okay. And sometimes the dogs are jerked around by these catch poles; correct?

A. That's true. Not by the catch pole, but by their action.

Q. I understand. They resist. They don't like it, just like we wouldn't like a noose being put around our necks?

A. Exactly.

Q. They resist. And officers have to do that because they could get bit in the face or on the hands or something like that; correct?

A. Yes, sir.

Q. I mean, I'm sure they're all experienced, but it happens on occasion, doesn't it?

A. What's that?

Q. Dog bites and things like that?

A. Sure.
Q. Let me ask you something just about the standard of care in this case, what is appropriate. Just as a rough point, dogs don't have the same standard of care as humans, do they?
A. Daily care, yes, sir.
Q. They don't have the same -- we don't require people to be kept in the same condition, children, as dogs; correct?
A. Well, we require dogs to be in sanitary conditions in an enclosed area with three sides and a top.
Q. Let me give you an example. If I took a child and put the child in a cage out back, give the child a bowl of food and a bucket of water, that may not be a violation.
A. No. I think you'd have a problem.
Q. But I could be charged with something like kidnapping, or I could be facing multiple felony charges. And that's just a fact. You've been an officer since the nineties; correct?
A. Yes, sir.
Q. I mean, that's just a fact. If a parent did that, at the very least, they would have serious, serious problems and maybe would even be on the national news; correct?

A. I'm sure it would be.
Q. And yet people all over Anderson County have dogs in cages out back with a bowl, with a roof. And it's acceptable; correct?
A. Depends on what's in the bowl.
Q. All right. But the point is that what's good for a dog is not necessarily the same for a human; correct?
A. I'm sure. We're not discussing how we're keeping a human up. We're discussing the living conditions of these animals.
Q. And you've testified that you don't have any manuals, procedures or precise regulations as to what's acceptable for the care of a dog versus a human?
A. We have the law, and that's what we apply.
Q. Were these dogs happy with Ms. Sheridan?
MR. MCLAIN: Your Honor, there's no way he can answer that.
THE COURT: Rephrase your question, Mr. Toney.
Q. Did the dogs seem ---
MR. TONEY: Yes, I think I should rephrase that question.
Q. From what you observed, did the dogs -- did they seem like they were afraid of Ms. Sheridan?
A. I don't know about Ms. Sheridan, if they was afraid there, but they were very aggressive towards the officers

that were out there.
Q. There were a lot of officers that day; correct?
A. Yeah, there was.
Q. If I tell you the exams came back from PAWS that maybe one, or at the most perhaps two, were antisocial -- this is your own vet's exams -- would you accept those?
A. What I accepted that day was what was toward the officers that day. Now, after they got into the PAWS, their whole circumstances, I'm sure, is going to change.
Q. Yes, sir.
MR. TONEY: If I could have just a second, please, sir, Your Honor?
THE COURT: Yes, sir.
MR. TONEY: That's all the questions I have for Lieutenant Powell, Your Honor.
THE COURT: Okay.
Mr. McLain, any redirect?
MR. MCLAIN: I have nothing further, Your Honor.
THE COURT: Any objection to this officer being excused?
MR. MCLAIN: No, sir, Your Honor.
MR. TONEY: No objection, sir.
THE COURT: All right. Thank you, Officer. You are excused. Leave the exhibit up here.

Mr. McLain, call your next witness.

MR. TONEY: Is it possible to use the restroom?

THE COURT: We'll take a short break. We'll take a short break.

MR. TONEY: Thank you, sir.

THE COURT: Mr. Bailiff, take our jury out, please.

(WHEREUPON, the jury exited the open court at approximately 11:03 a.m.)

THE COURT: All right. We'll be in recess.

(WHEREUPON, court stood in recess for a short break.)

THE COURT: Counsel, approach.

(WHEREUPON, a bench conference was held off the record.)

THE COURT: All right. Mr. Bailiff, if you'd bring our jury back for us, please, sir.

(WHEREUPON, the jury entered the open court at approximately 11:16 a.m.)

THE COURT: All right. Mr. McLain?

MR. MCLAIN: Your Honor, the State calls Jason Hanks with the Anderson County Sheriff's Office.

JASON CRAIG HANKS,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:

Q. Deputy Hanks, what do you do for a living?

A. I'm an Anderson County Sheriff's Deputy. I work in the Animal Control Division.

Q. Okay. And how long have you worked for the sheriff's office here in Anderson?

A. For the sheriff's office, I started working in 2010.

Q. Okay. And have you spent from 2010 till present in the animal control?

A. Yes, sir.

Q. Did you have any prior law enforcement experience prior to coming to Anderson County?

A. I worked for the Anderson County Public Safety from 2006 to 2010 for the Animal Control Division.

Q. Okay. And what is your current official position within the sheriff's office?

A. I'm a corporal. I'm a field training officer for the Anderson County Sheriff's Office Animal Control Division.

Q. Okay. How long have you worked in that capacity?

A. Since 2013.

Q. Okay. And so were you working in that capacity on March 18th, 2015?

A. Yes, sir.

Q. Okay. And did you come into contact with the

defendant in this case, Ms. Sheridan, on that day?
A. Yes, sir.
Q. And where did you make contact with Ms. Sheridan?
A. I didn't have very much verbal communication with Ms. Sheridan on that day. I was observant and was around her on the property that day. But on that day, that's when I came into contact with her. I didn't have very much conversation with her.
Q. You were on her property that day?
A. Yes, sir.
Q. The property located at 818 Hamlin Road in Anderson?
A. Yes, sir.
Q. And can you describe the property?
A. Go ahead. Describe the property?
Q. Yes, sir.
A. When I arrived on the scene, you pull up to driveway. And there is a trailer to your left, and there is a fence area that was closed with a chainlink fence with a gate. I approached the chainlink fence. My job was to be the perimeter -- on the outside of the perimeter observing what's going on. Once I came through the gate, there was a large amount of dogs that came towards the gate towards me. There was a lot of feces, a lot of urine, on the grounds inside the gate. And we called that the fenced area number one.

Q. Okay. Approximately how many dogs were in the fenced-in ---

A. There was approximately around twenty, twenty-something dogs inside the fenced area number one. And most of them were small or medium-sized dogs.

Q. Okay.

A. I did a lot of observing on the fenced area number one because I waited until the other deputies do their job as they move on progressing up through there. So most of -- one other thing that I saw was most of the -- some of the animals that was on the porch and everything had severe skin disease. You could smell the skin disease. As I approached ---

Q. What does that smell like?

A. It's kind of hard to tell. If you've worked in my capacity, you can tell it's either the mange. It's got a distinct smell to it. It's like a sickening smell. Not like a flea infestation smell, stuff like that. But it's sort of t-- hat's how we -- you know, since we've been around that many animals, you know, we've kind of gotten used to how that smells.

As I went inside the fence -- none of the animals out there were mean or anything inside the fenced area number one. But a lot of them approached me. Most of the animals that had the skin disease were sickly, and

they stayed on the porch. And so when I walked up onto the porch, there was several dogs that had the severe mange, that had the severe skin disease, that was -- you know, their skin was breaking apart. You could see blood on their skin is coming out. It's like oozing out. The dogs were laying on blankets that were soiled with urine. You could smell the ammonia, and you could see it. The feces, fresh feces, dried feces.

Q. There was fresh feces on the blanket?

A. Yes, sir. And some of the -- you know, there was a lot of blankets up there. But sometimes you can see, I guess, the wood of the porch. You can also see the feces on the wood of the porch like that.

There was no water up on the porch. There was no water inside the fenced area number one. When we got down, we -- there was several upside down dog houses, probably four or five of them, that was sitting out up under her porch. They were sitting on the ground. You know the ground was wet.

There was no water inside fenced area number one. There was no food bowls, no food in the food bowls in fenced area number one.

Q. Were there any buckets in there?

A. If there were, there was only one or two. The only bucket that I did see inside fenced area one was at the

-- when you walk up through the next fence area to the right-hand side, inside fenced area one was a yellow bucket. And it was filled with feces and urine. And that's the only bucket that I really paid attention to.

Q. And how many dogs did you say were in fenced area number one?

A. Around nineteen to twenty-something animals. And, you know, the cats can come and go, jump the fence and stuff like that.

Q. Did all nineteen or twenty of those dogs have access to that bucket that had feces?

A. Yes, sir. Inside that fenced area number one.

Q. Okay. When you were up on the porch, did you enter the actual trailer?

A. No, sir, I did not go into the actual trailer. There was another deputy along with the forensic photographer that went in the trailer. The only thing I did observe -- I can't quite remember how many dogs actually came out of the trailer, but there was one picture that one dog did come out of the trailer that we photographed it. I don't know how many dogs -- there weren't very many dogs inside the trailer.

Q. Okay. And what, if anything, did you do after that?

A. Sir?

Q. What, if anything, did you do after you left the

porch area?

A. The porch area -- then my next job was to proceed inside another gate that was separated between another gate. There was a little bitty walk area. And what we decided to call that was the cat/puppy house. It was a utility building that had animals that can go inside and outside of the door. And you can -- but once we got there, there was a dog house inside them two areas. And we presumed the dog was dead living in the dog house. The dog was just laying on its side. It was a large black and tan Rottweiler mix-type dog. It didn't respond to us or anything, so we presumed that dog was dead. So we went around.

Q. You said it didn't respond. What did you do to try to get it to respond?

A. Well, we clapped our hands. We hollered at it. We yelled at it. And, you know, it didn't -- it didn't blink its eyes or anything. So we left that animal alone. And it did turn out that the animal finally got up and walked out. So that's the first thing that we noticed. So when we ---

Q. Was there any food or water located in that area that that dog could access?

A. The only food inside the dog had access -- that that dog had access to was inside the cat/puppy house. There

was no dog food on the ground inside the cat/puppy house. There was a silver pan that was on top of a kerosene heater that had water in it. And I'm assuming that's where the cats got the water from. But the dogs could not reach that water.

Q. Okay. So explain to the jury what you saw when you went into the, quote unquote, cat/puppy house?

A. The cat/puppy house is a fairly large utility building. Once you walk in, you can see on the floor that it had feces and urine. There's fresh feces, fresh urine, and it's been there for a long time. And when you walk in on your left-hand side, it was sort of like a shelf that goes to the left side of the building. She had a lot of pesticides, cleaning solutions and stuff like that on the left-hand side.

There was cats -- the cats were all -- can free range, free run. And there was some of them that was sitting inside the insulation and some of them that had, you know, skin conditions sort of like what the dogs had but not, you know, as pronounced. I did see the one part they had cat food on top of the shelf up there. And the only water that I saw with the cats was the silver pan that was sitting on top of a kerosene heater. And the cats had to jump inside the water pan to get the water because there was no ledges because the pan took a

biggest section of the top.

There was dogs in there. I can't remember how many dogs. I mean, it was at least five or six dogs. They was severely -- had the mange. There was severe skin infection. One of them had the same thing as the other one where the blood and everything was oozing out of the skin. Some of the cats had pronounced -- you could hear them coughing and stuff like that. And that's usually considered with an upper respiratory infection.

None of the dogs had access to water. None of them had access to food. All the cat litter boxes were overfilled with the feces. She -- if you go -- when you walk in to the door and if you look to the right, there's some steps that leads up to another little part on the building that's inside the building.

She had a puppy kennel or a baby cage separating the floor from the rest of the main grouping area. Inside there, there was a mother dog, five or six puppies. And there was some strange looking dog that later come out to be a Cocker Spaniel. It was totally hairless. It was emaciated. You could see all of the bones. The hip bones were protruding. The animal fell down a couple of times when we was trying to go in there and see what was going on. That floor was saturated with urine. That floor was saturated with feces.

And there was another room that you can go into, if you go back into the right-hand side of the building, that had her computers, her video monitoring system, the leashes, collars and stuff. And that also -- that floor had feces and urine, but there was no animals currently inside that room when we got there. And that's basically, you know, what I observed inside that building.

Q. Did you go anywhere else on the property?

A. Yes, sir, I did. I went out the building to the left through a gate. And we called that fenced area number two. But it's a large piece of property that enclosed with a chainlink fence that's surrounding the property. And there was probably twenty-something dogs out there that could run freely on that property. But them dogs, there was no shelter for them dogs to run to. There was no water, no water bowls, out there on the free-range property. There was no food bowls out there for the free-range property. Most of them dogs was unsociable. We couldn't really get close to them.

The yard wasn't as bad.

Q. What do you mean you couldn't get close to them?

A. They were real unsociable. They hadn't been -- you know, we couldn't call them like a normal pet or a domesticated animal. You know, you call your dog to come

to you. You know, you can tell that the animal did not want to be around humans. They'd just run off.

The yard was filled with urine, urine spots, fresh urine puddles, the feces. And inside that, the fenced area number two, that's where her kennels were. And she had some kennels that was going on the side of the property, and she had a bunch of kennels in like a little circle part over here. And in over half of them kennels, the dogs in there, some of them had hair loss.

They was all -- almost all of them had feces in the kennels; some of them didn't have feces in the kennel. Some of them had water; some of them didn't have water. Some of them had food; some of them didn't have food. Most of the feces that was there were a couple of days old feces.

Q. How could you tell that?

A. The color of the feces. It's sort of like, you know, when you have feces it's dark brown or it's in a roll or puddle. And it's usually dark brown, some type of brown color. As the sun hits it and over a couple of days, it turns white and kind of powderized. And that's what some of them -- it was old feces and new feces.

There was a dog in the kennel that was on a chain and inside the kennel. And he had another little kennel that was -- like a kennel piece that was blocking his

side. But he had a hole in there where he can get through the hole. And there was some rags and feces. So every time he would come up under the hole, he would get choked on his chain even though he would wallow in the feces and the urine. And that's basically most of the fenced area number two and all the kennels.

In her front yard, we're going to call that her personal fenced area. And that's her -- there's another type of fenced area right there. She only had one dog in there, and that was like a black-and-tan Doberman. We asked her, and she considered that her personal dog. The dog did not have any shelter. The dog did not have any food. It didn't have any water, and the dog was very thin.

Q. And does that cover the entire ---

A. That did. The fenced area one, the puppy house, fenced area two, the kennels and her personal fenced area.

Q. And were you present when the dogs were actually seized?

A. Yes, sir.

Q. And how many animals total were actually seized that day?

A. It was fifty-three dogs and seven cats.

Q. Okay. And did you sign the warrants?

A. I did. I signed the warrants.
Q. Did you at any time confer with Dr. Powell at PAWS prior to signing the warrants?
A. Yes, sir. The day after the seize or after the incident, I went and spoke with Dr. Powell before I went and seen the judge.
Q. Okay. And at any time on the 18th while you were at the property in the presence of Ms. Sheridan, were you provided with any sort of form of proof that any of the dogs on that property had been vaccinated for rabies?
A. My understanding was when I was observing -- and that's what the deputies were doing is they was ---
MR. TONEY: Objection. Objection to his answer. He's saying from his understanding from what he was observing with other deputies.
THE COURT: All right. Rephrase your question, Mr. McLain.
Q. Were you provided with any proof of ---
A. No, sir, I was not.
Q. Okay. Did you see if any of the dogs had tags on their collars?
A. No, sir, they did not.
Q. And based off of that, what did you do?
A. Well, since there was no medical condition or any medical information provided or with the visible

conditions that I saw and no proof of rabies vaccinations, that's when I decided, you know, to issue the warrants and have her arrested.

Q. Okay. I have no further questions. If you'll answer any questions Mr. Toney has.

THE COURT: Mr. Toney?

CROSS-EXAMINATION

BY MR. TONEY:

Q. Officer Hanks, you conferred with the veterinarian before issuing the warrants?

A. The next day, yes, sir.

Q. Next day? And you relied on -- you're not a vet, are you?

A. Sir?

Q. You're not a veterinarian?

A. No, sir, I'm not.

Q. And as to the condition of the animals, you would be willing to go with whatever the vet said. Whatever the vet says is the condition of the animals, you would stipulate and agree that that is the condition of the animals; correct?

A. If it's an internal issue. I can do external issues.

Q. What do you mean you can do external issues?

A. If it has an open wound or if it has skin

conditions, that's self-explanatory. You know, if they're having a lot of blood coming out or oozing out.

Q. Now, Anderson County has a vet; correct?

A. Yes, sir.

Q. And this vet has gone through many years of school; correct?

A. Yes, sir.

Q. You understand it's harder to get into vet school than it is to be a lawyer or a doctor? You understand this, don't you?

A. No, sir.

Q. It's extremely difficult. And the places are extremely limited. You know this; correct?

A. No, sir.

Q. You have to get a doctoral-level degree; correct?

A. Yes, sir.

Q. They're a doctor of veterinary medicine, and they have to intern also; correct?

A. Yes, sir.

Q. And the schooling even to get into vet school -- it's probably easier to get into medicine than it is to get into vet school. You understand this, don't you?

A. No, sir.

Q. It's very competitive?

A. No, I don't understand.

Q. Okay. If a vet -- if your vet -- I mean, this is the vet that Anderson County hires. If that vet examined the dogs and issued a report, you'd be willing to go with that report, wouldn't you?

A. With the internal injuries, yes, sir.

Q. Well, I understand because you should be able to overrule a vet. If the vet says one thing and you say another, probably you are correct; right?

A. Not on the external injuries.

Q. Not on the external injuries?

A. That's correct.

Q. You think your judgment should overrule your own vet's?

A. She didn't rule that. We both ruled that.

Q. Okay. Now, since the vet doctor has said one thing, tell me -- I understand you may not have ten years of science training like a vet. How many years of science training do you have?

A. I have the only thing that I've been trained on at the sheriff's office. I don't have a degree in veterinary.

Q. So you don't even have one year of science training? Do you have ten hours of science training?

A. No, sir.

Q. Okay. Do you have a manual or a book or a set of

standards as to how to care for dogs?
A. Not on me, but we do have that.
Q. You do?
A. Yes, sir.
Q. Where is that book?
A. Well, it's at the office.
Q. And what's it called?
A. It's made by the National Animal Control Association of North America.
Q. And that's the standard you use ...
A. Yes, sir.
Q. ... to determine if someone's in violation of the laws in this case?
A. Sir?
Q. And that's the book you use to determine if someone's in violation of the animal statutes in this case regarding animal neglect?
A. No, sir. That's not the book I used for the violation of the -- I used the law that's in Anderson County for the violations.
Q. So you don't follow this book you have back at the office?
A. It's an advisory tool for looking at the animal if they're sick, emaciated, in distress, first aid, first-aid response.

Q. Does it set standards of care as to how often you should clean cages out, for instance, or how much water, how many times there should be vet visits? Things like that?

A. It's not a veterinarian book.

Q. Okay. But does it sets standards of care as to how many times -- for example, if someone was to operate a rescue or even if you just had a few dogs, does the law state how many times you're to exercise the dog every day, how big the cage is going to be?

A. No, it doesn't say any exercise or how long the dogs have to be in a cage.

Q. As a matter of fact, it doesn't give any specific information as to the care of animals, does it?

A. Nothing about how long it was to be inside of that.

Q. Okay. So there's no state manual on how to run a rescue either; correct?

A. I don't know.

Q. There's no statute on running a rescue, no regulations, no nothing; correct?

A. Just statutes -- tax exemption status.

Q. Okay. The law is pretty nonspecific as to what's required of dog owners; correct?

A. Sir?

Q. The law is quite nonspecific as to what's required

of dog owners as to the standard of care? There's no preference in the law -- there's nothing where you can go and say, well, you cleaned the cage up yesterday but you were supposed to clean it out at night and not yesterday morning. There's nothing like that, is there?

A. Yes, sir.

Q. There is?

A. Yes, sir.

Q. And where's this book?

A. It's in the statute.

Q. Okay. It's in the statute? Really? Perhaps you could ask the solicitor to show you a copy of the statute. I'm sure he has it. Tell me where in the statute it is. What's the code number?

A. I don't ---

Q. And read to me the section.

A. Well, it's the ill treatment of animals.

Q. And it tells you how often you're to clean the cages?

A. No, sir. It tells you it's unsanitary conditions.

Q. Okay. But it doesn't tell you specifically how long you're -- how often you're to clean a cage, how often you're to change the water. It doesn't say that specifically, does it?

A. Not in the law code.

Q. Okay.

Anderson County has a rescue; correct?

A. Sir?

Q. Anderson County has a rescue?

A. Has a rescue?

Q. Yes.

A. We have a lot of rescues.

Q. PAWS is Anderson County's rescue; correct?

A. That's a county-owned facility for county-owned animals. It's not a rescue.

Q. All right. I'm sorry. And there are a lot of rescues in Anderson County, you said?

A. Yes, sir.

Q. How many are there?

A. I have no idea.

Q. PAWS takes in dogs from all over; correct?

A. No, sir. They just take from Anderson County residents.

Q. They take many dogs from Anderson County residents; correct?

A. I assume so.

Q. These are dogs that maybe someone doesn't want, maybe they found the dog in the street, or maybe the dog's too big for the house and they have small children. It could be many reasons; right?

A. Yes, sir.
Q. Some of the dogs they take in are healthy, and some are not healthy; correct?
A. That's correct.
Q. And that's why they have a veterinarian, a vet, at PAWS and they have a sick area, and they have all these medicines and facilities; correct?
A. Yes, sir.
Q. Some dogs are healthy and some dogs aren't?
A. That's correct.
Q. And they take in dogs that have -- some dogs have skin conditions, some dogs don't; right?
A. That's correct.
Q. Some dogs maybe have been fighting and they have wounds, and some dogs don't?
A. That's correct.
Q. Some dogs maybe even have broken bones where they've been hit by a car, and some dogs don't; correct?
A. Yes, sir.
Q. And they follow certain procedures, I guess, or maybe they make assessments as to what they're going to do with these dogs?
A. I think so.
Q. Some dogs they put down; some dogs they keep alive. Correct?

A. Yes, sir.
Q. But there are right now on any given day, any year, any time, there are at least some sick dogs at PAWS? I mean, on any day of the week? Any day?
A. Yes, sir.
Q. And they make judgments as to whether they're going to -- how they're going to try to treat a dog or put the dog down?
A. That's correct.
Q. And those are individual judgments as to how long they want to try to keep a dog alive or not; correct?
A. No, sir. If it's a medical problem, it's done by the veterinarian staff.
Q. Okay. Sometimes the vets kill the dogs. They euthanize them. I'm not saying that they shoot the dog or anything. But they give the dog and injection and dispose of the dog properly; correct?
A. Yes, sir.
Q. Debra Sheridan runs a rescue; correct?
A. I don't know.
Q. That's your understanding; correct?
A. That's my understanding.
Q. And she takes in strays or people give her dogs or she gets dogs from somewhere; correct?
A. Somewhere.

Q. Okay. Some of the dogs she takes in are in good condition and some aren't; correct?
A. Yes, sir.
Q. And assuming -- I mean, I'm assuming that she tries to nurse some or all of these dogs back to health; correct?
A. I don't know.
Q. I mean, you said you saw medicines or something in the office; correct?
A. Sir?
Q. I mean, she does give the dog medicines at times; correct?
A. Who?
Q. Ms. Sheridan.
A. I have no idea.
Q. The mere presence of a dog with a skin condition does not mean that that dog is not receiving medical treatment?
A. I asked her that day was they receiving medical treatment, and she was unable to provide any.
Q. Debra had cages in this place; correct?
A. Sir?
Q. Ms. Sheridan had cages in the facility; correct?
A. Yes, sir.
Q. And these cages had roofs on them; correct?

A. Yes, sir.
Q. And they had a huge building with beds; rights?
A. Yes, sir.
Q. And all of the cages had roofs on them, and some of them had dog houses inside of them?
A. That's correct.
Q. Now, that day, the animal control officers met down the street and then went to the facility sometime, or at least some of the officers did; correct?
A. Yes, sir.
Q. Some went there initially, and some met at a meeting place, and then all went in together?
A. That's correct.
Q. And when you came there, the dogs are understandably -- I mean, when dogs see strangers, they bark; right?
A. They weren't barking, not the dogs in the first fenced area. They just came and greeted me at the fence.
Q. So they were pretty sociable; right?
A. Yes, sir, in the first fenced area.
Q. Okay. Come to greet you maybe like dogs that are happy and have been treated well?
A. They didn't look like they was treated well.
Q. But they weren't unsociable, were they?
A. They was sociable.
Q. Okay. So the dogs didn't even bark, they just come

to greet you; correct?

A. They seemed like they were doing that, yes, sir.

Q. And just for the record, dogs don't have to be inside. They can be kept outside in appropriate cages; right?

A. If they have appropriate shelter, food and water.

Q. People keep dogs all over Anderson County outside; right?

A. Sir?

Q. People all over Anderson County have dogs outside. Some outside; some inside?

A. That's correct.

Q. These dogs here, there are all buckets of water near them; correct?

A. Sir?

Q. There were all buckets of water available to them; correct?

A. No.

Q. All of them did?

A. No, not all of them.

Q. When did you arrive at the scene?

A. When did I arrive on scene?

Q. Were you one of the first on the scene?

A. Yes, sir.

Q. Is it possible that any of these dogs overturned any

buckets?
A. Only one in one kennel.
Q. And you looked at all of the dogs simultaneously all over the property?
A. Yes, sir.
Q. These dogs here in these pictures -- have you seen the pictures which have been introduced?
A. Sir?
Q. Have you seen the pictures which have been introduced?
A. No, sir, I have not.
Q. This is Exhibit Number 2. You can't see any feces in that picture, can you?
A. Yes, sir, I can.
Q. Where is it?
A. If you look to the right, there's like a little pallet out there. Take a right. Them dark spots that's on the ground right there, that's piles of feces.
Q. Okay. But it doesn't look like there's -- it's not noticeable, is it?
A. Well, it was to me.
Q. Not in this picture, is it?
A. I can tell it in the picture.
Q. But someone looking at it who's not as experienced can't even see it; correct?

A. Sir?
Q. Someone who's not experienced can't even identify it from this picture, can they?
A. I can't answer that.
Q. Okay. But by any reckoning -- you say you can recognize it, but it doesn't look like it from here, does it?
A. I can tell it from here.
Q. You can tell it, but maybe someone else can't; correct?
A. I can't answer for anybody else.
Q. All right. This is Exhibit Number 3 which has already been introduced. It looks quite clean in that picture, doesn't it?
A. That's her daddy's dog. That's not one of the dogs we messed with.
Q. Okay. So the answer to that is yes; correct?
A. No, sir.
Q. This is Exhibit 4. Now, this shows some feces; correct?
A. Yes, sir. That's the one I was talking about that had the chain on with a choking hazard. He can actually come through that fence right there, and he can come inside, you know, right there.
Q. Now, you don't know how long that feces has been

there?
A. Had to be two or three days old because it's already turned white.
Q. But you don't know when that cage was cleaned, do you?
A. Sir?
Q. You don't know when that cage was last cleaned?
A. It hasn't been cleaned in two or three days.
Q. There's one, two, three, four, five, six, seven piles of poop; correct?
A. That's unsanitized condition.
Q. That dog could have pooped that much in twenty-four hours?
A. I have no idea.
Q. That's right. You don't know, do you?
A. (No verbal response)
Q. This is Exhibit 6. This is the dog that you -- that was there; correct? This is one of your exhibits or the solicitor's exhibits, Exhibit 6. That shows a dog on a dog house in a cage; correct?
A. Yes, sir.
Q. And that cage has a roof; right?
A. Yes, sir.
Q. And it's off the ground; right?
A. Yes, sir.

Q. And it's that expensive composite boarding?
A. Sir?
Q. It's that composite boarding; correct?
A. I can't hear you. What did you say?
Q. I beg your pardon. It's composite; right?
A. I've got two hearing aids, and I can't hear.
Q. Maybe it's not you. Maybe it's me. Maybe I just need to speak more clearly.

THE COURT: Re-ask the question. The witness wasn't able to hear your question.

MR. TONEY: Sorry about that.

Q. That's composite boarding; correct?
A. Yes, sir.
Q. And that's pretty expensive; correct?
A. Yes, sir.
Q. And you can see a little bit of poop in that picture; right?
A. Feces, yes, sir.
Q. And -- feces. I beg your pardon. But nothing that couldn't have been done in twenty-four hours, not in that picture; right?
A. It can be cleaned.
Q. Let me ask you this. You actually had a forensic photographer come out; right?
A. Yes, sir.

Q. And the job of the photographer was to document the evidence; right?
A. Yes, sir.
Q. And the evidence that you have is what's contained in these pictures?
A. That dog right there was charged for unsanitized condition. That's the evidence there that they see inside the kennel.
Q. Now, you came at approximately ten forty in the morning that morning?
A. That's correct, sir.
Q. And you don't know if she had a chance to clean the cage that morning; right?
A. That feces had been there a couple of days.
Q. You don't know that though. You didn't have that house under surveillance, did you?
A. When they change color, it takes a couple of days for feces to change color.
Q. You don't know if that cage was cleaned the day before. You didn't watch it, did you?
A. No, I didn't watch that kennel. No, sir.
Q. All right. This is Exhibit 7, the next in the sequence. These are dogs in the facility; correct?
A. Yes, sir.
Q. And as you say, they're quite sociable?

A. Some of them. The sick dogs, those on the porch, stayed on the porch. Most of them dogs, the small dogs there and there was a couple of medium-sized dogs, that did greet me at the gate.

Q. These dogs aren't running from you or the photographer. They're just sitting there; right?

A. That's correct.

Q. They seem like they're very much unafraid of people; is that correct?

A. Them are, yes, sir.

Q. Like dogs that maybe have been treated quite well?

A. They've been socialized.

Q. So socialization doesn't just happen. Someone has to socialize them; correct?

A. Somebody at some time.

Q. Okay. So somebody worked with these dogs? Somebody loved them; right?

A. They were socialized.

Q. All right. I see a couple of pieces of feces there, but it looks generally quite clean, doesn't it?

A. (No verbal response)

Q. Doesn't it look quite clean in that picture?

A. Yes, sir.

Q. Okay. These were dog houses that I believe you referred to in your testimony, correct, under the porch?

A. It's the top of a dog house.
Q. The top. It's just the top of the dog house; right?
A. That's correct.
Q. That's not the entire dog house?
A. That's correct.
Q. This is obviously just parts of dog houses being stored; right?
A. Yes, sir.
Q. You referred to a bucket with some poop in it; correct?
A. (No verbal response)
Q. That would be the yellow bucket; right?
A. Yes, sir.
Q. Because there was a yellow bucket with poop in it different in color from all the other buckets; right?
A. That's the only yellow bucket I saw right there.
Q. And that's the one that had the poop in it; right?
A. It looks like feces and poop and urine.
Q. So that's the feces bucket. That's the one you put the feces in when you clean up, right, obviously?
A. I have no idea.
MR. TONEY: And that would be Exhibit 11, just for the record.
Q. Now, you said a dog you thought was dead. Is this the dog that you thought was almost dead?

A. Yeah, that's the one I was talking about. It took several minutes for him to respond to us.
Q. And he was a little listless; correct?
A. Sir?
Q. He was perhaps a little listless that day?
A. I think so.
Q. But whatever his reasons for being listless -- is it possible this dog -- do you know any of the history of this dog?
A. Do I know of any of the history of the dog?
Q. Yes, sir.
A. No, sir.
Q. Do dogs ever get separation anxiety?
A. I can't answer that question.
Q. Any dogs ever in the world get separation anxiety?
A. I can't answer that question.
Q. I mean, there's all kinds of stories of dogs going to their master's funerals and being upset when their master's gone. Dogs can get anxious when they're not around their owner; correct? They can get anxious -- I mean, this is common, isn't it?
A. I can't answer that question about that dog.
Q. You don't know what the condition of this dog was, what emotional state, do you?
A. No. I just knew he wasn't responsive at first, and

I thought he was dead, and then he came alive.
Q. If there were reasons that dog may have not been responsive, you would be willing to defer to a vet, wouldn't you?
A. Yeah. I asked for medical records, and she didn't have any.
Q. Okay. Would you be willing to defer to a veterinarian for your opinion as to the reasons for the dog's non-responsiveness?
A. At that time, the vet made the decision on that. But that's not the reason why I signed the warrant on that particular dog.
Q. So you and the vet disagreed.
A. We didn't agree or disagree on anything.
Q. All right.
Here's Exhibit 14. And this shows a row of cages; right?
A. Yes, sir.
Q. And these cages don't look rusty, do they?
A. No, sir.
Q. And they're up off the ground; right?
A. Yes, sir.
Q. And they've got the expensive composite decking; right?
A. Yes, sir.

Q. And that's the good stuff that won't necessarily splinter and warp. It's treated and composite, so it's high-quality ---

A. Yeah. The flooring was, yes, sir.

Q. And there's a nice new roof on top of it; right?

A. Yes, sir.

Q. And dog houses in-between in each one or most of them or all of them; right?

A. Yes, sir, most of them did have water.

Q. So they not only had a -- so they all had -- most of them had water, you say. They all had roofs and the dog house; right?

A. Yes, sir.

Q. So they had double roofs. Now, there's some feces in that cage; right?

A. Yes, sir.

Q. You don't know how long that feces has been there; do you?

A. On that picture there, there's different colorations of the feces. You have fresh feces, brown in the front. Then you have the white feces that's in the back. So that's, again, was two or three days.

Q. But that house, once again, wasn't under surveillance before this date, was it?

A. I have no idea.

Q. You don't know, do you?
A. No, sir.
Q. Here's the, I guess you call it, the puppy/cat area. I guess it's as good a description as any. This is the area where the puppies were; right?
A. Yes, sir.
Q. And you can see the water in that bowl; right?
A. No.
Q. You can't?
A. No, sir.
Q. You can see where it's darker on the side, can't you?
A. It looks dirty to me.
Q. Okay. And there's food right there?
A. Yes, sir.
Q. The nice big tray of food that can't be turned over; right?
A. That's correct.
Q. And there's a dog eating the food; right?
A. Yes, sir.
Q. And there's some feces in there; right?
A. There's a lot of it.
Q. But there was six or seven puppies in there plus a mama; right?
A. Yes, sir.

Q. So maybe not too much feces for all of those dogs?
A. There was a lot.
MR. TONEY: That's all the questions I have of this witness.
THE COURT: All right. Any redirect?
MR. MCLAIN: Nothing further from the State, Your Honor.
THE COURT: Okay. All right. Thank you. Any objection to this witness being excused?
MR. TONEY: None, sir.
MR. MCLAIN: No, sir, Your Honor.
THE COURT: All right. Officer, you are excused. Thank you.
THE COURT: Okay. All right. Ladies and gentlemen of the jury, we are going to break for lunch at this point. Do not discuss the case with third parties, do not deliberate amongst yourselves, and do not conduct any third-party or independent research into the case. I hope everyone has a good lunch. Be back in the jury room at two o'clock.
(WHEREUPON, the jury exited the open court at approximately 11:59 a.m.)
THE COURT: Okay. Anything before we go into recess?
MR. MCLAIN: No, sir, Your Honor.

MR. TONEY: Nothing, sir.

THE COURT: All right. We will be in recess until ---

MR. TONEY: Two fifteen, did you say?

THE COURT: Well, I told them to be back at two. We'll try to be back at two. We'll get started at two fifteen. So if you have any issues or anything, we can deal with those before we bring the jury in.

MR. MCLAIN: Thank you, Your Honor.

(WHEREUPON, court stood in recess for a lunch break.)

THE COURT: All right. Counsel approach.

(WHEREUPON, a bench conference was held off the record.)

THE COURT: Okay. Anything from the State before we bring our jury back in?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Anything from the Defense?

MR. TONEY: Nothing further, Your Honor.

THE COURT: Okay. Mr. Bailiff, if you can get our jury for us, please, sir.

THE BAILIFF: All right.

(WHEREUPON, the jury entered the open court at approximately 2:18 p.m.)

THE COURT: All right. Mr. McLain, call your

next witness.

MR. MCLAIN: Your Honor, the State calls Leandra Smith with the Anderson County Sheriff's Office.

LEANDRA MICHELLE SMITH,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:

Q. Deputy Smith, what do you do for a living?

A. I'm a deputy sheriff for the Anderson County Sheriff's Department.

Q. And what is -- how long have you worked for the sheriff's office here in Anderson County?

A. For fourteen months.

Q. Okay. And what is your current position with the sheriff's office?

A. I'm a deputy in the animal control department.

Q. And how long have you worked in that capacity?

A. For the sheriff's department for fourteen months. I was previously with the City of Anderson in the same position.

Q. Okay. For how long were you with the City?

A. Five years.

Q. Were you working in your current capacity on March 18th, 2015?

A. I was.

Q. And on that day, did you come into contact with the defendant in this case, Ms. Sheridan, at her residence, 818 Hamlin Road?
A. Yes, sir.
Q. And what were the circumstances surrounding the contact you made with Ms. Sheridan that day?
A. I'm sorry. Can you be a little more specific?
Q. What led you to go out to her residence and make contact with her that day?
A. I was there at the direction of my lieutenant for a welfare check.
Q. And were you present when dogs were taken from her property?
A. Yes.
Q. And taken to PAWS?
A. Yes, sir.
Q. And at any point in time, do you recall if Ms. Sheridan was placed into custody?
A. Yes, sir. She was placed under arrest by Deputy Bruce.
Q. Okay. And do you recall if Ms. Sheridan was searched prior to being placed into custody?
A. She was not searched prior to being placed in custody, no.
Q. When was she searched?

A. Ms. Sheridan was search after Deputy Bruce placed the handcuffs on her. At that time, she began to request to go to the restroom.

Q. Okay.

A. And being the only female on the scene, I performed a search of Ms. Sheridan of her clothing and her person.

Q. Now, is that a standard procedure ---

A. It is.

Q. --- to search them after the cuffs have been placed on them?

A. Yes.

Q. And why is that?

A. Just because you're not going to search them before you had a reason to.

Q. Okay. And so you said you searched her clothing and her person?

A. Yes.

Q. And what, if anything, did you find when you searched her?

A. Ms. Sheridan had -- in her front left pocket, she had four small pocket knives, all under four inches. Completely legal. Those were taken out of her pocket and left on a table there with her father. In her front right pocket was a small ziplock baggie containing a white crystal-like substance and an approximately three-

inch long cut drinking straw which also had the same white substance inside.

Q. Okay. And where was that found again?

A. In her front right pocket.

Q. And what did you do with the substance once you took possession of it?

A. While I was on scene, I -- the latex glove I was wearing, I held it in my hand and turned the latex glove inside out with the -- both the baggie and the cut drinking straw still inside and then later transferred it to an evidence bag.

Q. Okay. And what, if anything, did you do after that?

A. I took it to the Anderson County Sheriff's Office and placed it into evidence.

Q. Deputy Smith, I'm showing you what's been pre-marked for ID purposes only State's Exhibit Number 1. Do you recognize that?

A. Yes, sir.

Q. And what do you recognize that to be?

A. These are the items that I placed into evidence that I found on Ms. Sheridan's person or in her pocket.

Q. How do you recognize them as those items?

A. The numbers match what I have on the receipts. We obtained little evidence receipts that I kept. The numbers here match the numbers there.

Q. And what numbers -- are they case numbers?
A. They are control numbers just for transmission records. The way the baggies are made, they have a tear-off at the top and with the numbers that correspond. That way we have a copy of what we dropped off, you know, just in case we need to reference it again. And then the same numbers are on the baggies that are placed in the evidence drop box.
Q. And when you place the evidence in the evidence drop box, do you have access to it after that at all?
A. No, sir.
Q. And when you placed that specific piece of evidence in the evidence drop box, was it in substantially the same condition as when you first found it?
A. Yes.
Q. Have you tampered with it at all?
A. No.
Q. And have you seen that substance between the day you dropped it off and today?
A. No.
Q. I have no further questions. Please answer any questions that Mr. Toney has.
A. Yes, sir.
THE COURT: Mr. Toney?
MR. TONEY: I have no questions of this

witness.

THE COURT: Okay. Any objection to this witness being excused?

MR. MCLAIN: No, sir, Your Honor.

MR. TONEY: None.

THE COURT: Thank you, Officer. You may leave. You are excused.

THE WITNESS: Yes, sir. Thank you.

MR. MCLAIN: Your Honor, the State calls Belinda Lee with the Anderson County Sheriff's Office.

BELINDA LEE,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:

Q. Ms. Lee, who are you employed by?

A. Anderson County Sheriff's Office.

Q. And how long have you worked there?

A. Thirty-three years.

Q. And what is your current position with the sheriff's office?

A. Evidence technician.

Q. Okay. And you said you've worked there thirty-three years. How long have you been an evidence technician?

A. Six years.

Q. Okay. What did you do prior to that?

A. I worked in records. I worked in the warrant division and investigation department.
Q. Okay. And what do your duties include with your current position?
A. I enter all the evidence that's turned in through the officers and put it in their perspective places.
Q. Okay. Organize it?
A. Right, uh-huh (affirmative).
Q. And in your current position, have you ever come into contact with any evidence collected in connection with the case against Ms. Debra Sheridan?
A. I did.
Q. Okay. And how do you know?
A. I have the paperwork that the officer filled out and turned in.
Q. Okay. Do you know on what date you initially came into contact with the evidence?
A. On March the 18th.
Q. Okay. And where did you first take the evidence?
A. Out of the evidence locker.
Q. Okay. And who all has access to the evidence locker?
A. My sergeant, myself and the other technician lady that works in the office with us.
Q. Okay. And once you picked up the evidence in this

case, what did you do with it?
A. I entered it into the system. It's sealed up when I get it. I put what we call a bar code label on it with the case number, and I filed it.
Q. Did the packaging or the container that it was in seem tampered with at all?
A. No, sir.
Q. And have you changed or altered the packaging or the substance at all?
A. No.
Q. Ms. Lee, I'm showing you what's been marked as State's Exhibit 1 for ID purposes. Do you recognize this item?
A. I do.
Q. And what do you recognize that to be?
A. What we call a BEST kit.
Q. Excuse me? I'm sorry.
A. We call this a BEST kit.
Q. Okay. And what does that exactly mean?
A. It's where the officers enter the drugs to be sent to the Anderson/Oconee Forensic Lab.
Q. Okay. And how do you determine on that packaging what case that goes with?
A. The officer fills out an evidence sheet, and this is what I get my information off of.

Q. Okay. And have you ever taken that evidence anywhere outside of the evidence area?
A. I did. I took it to the Anderson/Oconee Forensic Lab on March the 19th.
Q. Okay. And you left it there?
A. Yes, I did.
Q. And then at some point, did you come back into possession of that substance?
A. I did. I went back and picked it up on May 21st, 2015.
Q. Okay. And what did you do with it once you picked it back up?
A. We have a designated area in our vault where we store all of this -- the drugs. And I entered it into the vault.
Q. And so that was kept in the vault since May?
A. Right.
Q. And when you picked it back up from the forensics lab, did it look like it had been altered with at any -- other than any kind of testing that might have been done to it?
A. No. It comes back -- when I picked it up, it's in the seal just like it is now.
Q. And who seals it into that sealed bag?
A. The lab technician in the ---

Q. Is there any marking on there that shows that they were the ones that sealed it?
A. Yes. This is her paperwork here. This is her label.
Q. Okay. I have no further questions at this time. If you'll answer any questions Mr. Toney has.
THE COURT: Mr. Toney?
MR. TONEY: I have no questions for this witness.
THE COURT: All right. Any objection to this witness being excused?
MR. MCLAIN: No, sir, Your Honor.
MR. TONEY: None. None, sir.
THE COURT: Thank you, ma'am. You are excused.
MR. MCLAIN: Your Honor, the State calls Meredith Lanford with the Anderson/Oconee Regional Forensics Lab.

MEREDITH LANFORD,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:
Q. Ms. Lanford, can you tell the jury what you do for a living?
A. My job is a forensic chemist with the Anderson/Oconee Regional Forensics Laboratory.

Q. And specifically, what does it mean to be a forensic chemist?
A. Evidence that is brought to our laboratory, I analyze for suspected controlled substances.
Q. And how long have you worked in that position at the forensics lab?
A. I've worked with the Anderson/Oconee Lab for nine and a half years, and I worked a year at the Charleston Police Laboratory.
Q. At the Charleston Police Laboratory, did you have similar duties?
A. Yes, I did.
Q. And what type of training or education have you received to qualify for a position as a forensic chemist?
A. I have a bachelor of science degree in chemistry from Clemson University. I then went on to complete the forensic science certificate program at Greenville Technical College. I was trained and certified as a forensic drug chemist with my previous employer as well as my current employer. I was trained in the area of forensic drug chemistry with Drug Enforcement Administration. I'm a member of the American Chemical Society as well as the Clandestine Laboratory Investigating Chemists. And each year I have to have some kind of training or attend a seminar in the area of

forensics as well as complete a proficiency test in the area of forensic drug chemistry.

Q. And with your job, how many analysis -- how many analyses do you do on a substance in a given week? Let me rephrase. How many substances do you test in a given week?

A. In a given week, probably over a hundred.

Q. Okay. And have you ever had the opportunity to analyze a substance and determine whether or not the substance actually contained specifically methamphetamine?

A. Yes, I have.

Q. And do you know how many times you've done that?

A. Probably well over a thousand.

Q. Okay. And are those types of analyses part of your regular job duties?

A. Yes, it is.

Q. And Ms. Lanford, have you ever been qualified as an expert in your field in courts of general sessions here in South Carolina?

A. Yes, I have.

Q. How many times?

A. Twenty-one.

Q. And how many of those twenty-one times did you actually testify?

A. All twenty-one.

MR. MCLAIN: Your Honor, at this time the State moves to have Meredith Lanford qualified as an expert witness in the field of forensic chemistry and narcotics analysis.

THE COURT: Any objection?

MR. TONEY: No objection.

THE COURT: All right. Ms. Lanford would be admitted as an expert in forensic chemistry for narcotic drug analysis.

Q. Ms. Lanford, I'm showing you what's been marked as State's Exhibit Number 1 for identification purposes. Do you recognize that?

A. Yes, I do.

Q. And what do you recognize that to be?

A. This is what we call a BEST kit, which is we ask our agencies that give us evidence to put their evidence in these plastic bags in order to submit it for analysis. And after I'm done analyzing the evidence, I put our lab stickers and seal it with my date and initials.

Q. And how can you specifically identify what individual case it goes with?

A. It has the Anderson County Sheriff's Office case number, and then we also assign it a laboratory number. And each kit also has a control number that we keep up

and track with too.
Q. And when did you specifically receive that BEST kit?
A. I received this on March 19th, 2015.
Q. And what do you do when you receive it? What is your first steps you take?
A. When they turn in evidence, I just make sure that the BEST kit is sealed and -- properly sealed and the paperwork is filled out. And we scan that into our system, and it's then placed into an evidence drawer until I'm ready to analyze it.
Q. And where did you receive this?
A. I received this in our laboratory from Belinda Lee from the Anderson County Sheriff's Office.
Q. And what was the purpose of this coming into your possession?
A. In order to determine if any controlled substances were present.
Q. And did you analyze the substance?
A. Yes, I did.
Q. And is it now in the same or substantially the same condition as when you first received it other than any steps you had to take to analyze it?
A. Yes, it is.
Q. And what did you do with the substance once you were done with the analysis?

A. I put it in this outer bag. I label all the inside bags with my lab number, my initials and seal it with the date and my initials.

Q. And do you remember who picked the substance up from you at the lab?

A. Yes. Belinda Lee.

MR. MCLAIN: Your Honor, at this time the State moves to have State's Exhibit Number 1 moved into evidence.

MR. TONEY: I need to examine it, Judge.

THE COURT: Yeah, let Mr. Toney look at it.

MR. TONEY: No objection.

THE COURT: All right. State's Exhibit Number 1 would be admitted without objection.

(WHEREUPON, State's Exhibit Number 1 was admitted into evidence.)

Q. Ms. Lanford, in regards to State's Exhibit 1, will you please explain to the jury the test that you performed on that substance to analyze it for controlled substances?

A. The first thing that I do in an analysis is remove the substance from whatever packaging it is in. And I believe in this case it was in a clear plastic ziplock bag. So I removed the substance from that bag and took a weight of just the substance. I then performed two

screening tests on the substance. One is a color test, and one is on an instrument in our lab call an ultraviolet visible spectroscopy. I then do two confirmatory tests on other instruments in our lab to confirm if there is a substance, the controlled substance, present.

Q. And based on the testing you performed on this substance, were you able to form an opinion as to what that substance is?

A. Yes. I found that this substance contained methamphetamine at zero point zero six grams.

Q. And once again, what did you do with the substance once you were finished testing it?

A. Once I finished testing it, I put everything back in the bag and sealed it up in our bag.

Q. Did you mark it at all?

A. Yes. I marked all the inner bags with the lab number and my initials. And I also mark where I've sealed it, heat sealed the outer bag. And, of course, attached the stickers as well.

Q. Ms. Lanford, I have no further questions at this time. If you will, answer any questions Mr. Toney has.

CROSS-EXAMINATION

BY MR. TONEY:

Q. Zero point zero six grams, that's six one-hundredths

of a gram?
A. Yes.
Q. I'm trying to visualize that. If that was compared to a small spoonful of sugar, how much would that be?
A. It is a very small amount. But as you can see in the bag, it's enough to ---
Q. It's so small ---
A. --- do an analysis.
Q. I'm sorry. It's so small you can barely even see it; correct?
A. No, not in this case. You can see it in the corner of the bag.
Q. Show it to me, if you don't mind.
(WHEREUPON, the witness complied.)
MR. TONEY: That's all the questions I have of this witness.
THE COURT: Anything further from this witness?
MR. MCLAIN: No, sir, Your Honor.
THE COURT: Any objection to this witness being excused?
MR. TONEY: None.
MR. MCLAIN: No, sir, Your Honor.
THE COURT: Thank you, Ms. Lanford. You may leave. You are excused.
MR. MCLAIN: Your Honor, the State calls Dr.

Kyle Powell.

KYLE POWELL, DVM

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. MCLAIN:

Q. Dr. Powell, can you tell the jury exactly what you do for a living?

A. I'm a full-time veterinarian for Anderson County PAWS Animal Shelter.

Q. And how long have you been a veterinarian?

A. Since 1992.

Q. And specifically, how long have you been a veterinarian at PAWS here in Anderson County?

A. I started in August of 2009.

Q. And what is your official job title?

A. Staff veterinarian.

Q. And what are some of the duties as a vet of the job you hold?

A. I'm responsible for the herd health of all of the animals that are presented to the animal shelter. I'm responsible for maintaining compliance with all of the regulatory agencies that our shelter intersects with. I assist animal control officers with investigations and appearances in court and education and training of staff.

Q. And what type of training or education have you

received to qualify for a position as a veterinarian?
A. I graduated from the University of Georgia. It's an AVMA accredited school of veterinary medicine. You have to pass your national boards, your clinical competency exams and the State of South Carolina boards in order to practice medicine. My license is in good standing and has been since I started.
Q. And can you explain to the jury a little bit more in depth about the licensing process to become a veterinarian other than passing the boards. What does that actually mean?
A. The national boards are a test. It takes about a day to a day and a half to pass it. It is a comprehensive knowledge and skills test. If you do not practice, you do not get to -- if you don't pass it, you don't get a license. You cannot practice. The South Carolina board is more laws and regulations. They want to make sure that the vets know what rules they're supposed to follow. Clinical competency is as close as they can come to actually putting you through your paces in a clinic situation. All these scores are taken together to determine whether you should be allowed to touch a live animal in a medical way.
Q. And are there yearly requirements to keep your license with the state active?

A. Yes. Every two years, I have to have thirty hours of continuing education. Typically, these are at seminars. Some of them can be done online. I like to go to the hands-on, talk-to-the-other-professionals seminars.

Q. And have you attended any other sort of education or training outside of your veterinary degree that helps you in your job as a vet?

A. Yes. I am currently in a master's degree program through the University of Florida in veterinary forensics.

Q. And Dr. Powell, while working at PAWS, have you ever had the opportunity to examine mistreated or neglected animals?

A. Yes, sir.

Q. And how many times a year would you say that you do that?

A. Every day that I'm in the office.

Q. And have you ever qualified as an expert witness in state courts in South Carolina regarding the health and well-being of animals?

A. In the state courts, no. In the magistrate's courts, yes, sir.

Q. Okay. Did you actually testify those times?

A. Yes, sir.

Q. How many times? Do you remember?
A. At least a dozen.
MR. MCLAIN: Your Honor, the State moves to have Dr. Kyle Powell qualified as an expert witness in the field of veterinary medicine.
MR. TONEY: That's fine.
THE COURT: All right. Dr. Powell would be admitted as an expert in veterinary medicine without objection.
Q. Now, were you working at PAWS on March 18th, 2015?
A. Yes, sir.
Q. And do you remember anything specifically from that day?
A. I remember we did an intake of a large number of animals from animal control.
Q. Do you know where those animals came from?
A. I understand that they came from Ms. Sheridan's property.
Q. Have you had the opportunity to look at photographs from the living conditions the animals taken from that property were living in?
A. Yes, sir.
Q. And did that aid in you forming an opinion on the welfare and well-being of those animals?
MR. TONEY: Objection. I'd like to be heard.

THE COURT: All right.

Mr. Bailiff, would you take our jury out?

(WHEREUPON, the jury exited the open court at approximately 2:49 p.m.)

THE COURT: Okay. Mr. Toney, state your objection.

MR. TONEY: Your Honor, she's been asked to give an opinion as to the ultimate guilt or innocence of my client, whether or not my client violated state law. That's what I believe she's been asked to do. That belongs to the jury. And in this case, she's been qualified as a doctor of veterinary medicine, but not as any kind of expert on the laws of the state or as to whether or not my client breached the standard of care of which there has been no evidence provided. Because apparently they have testified there are no regulations on the subject, just the regulation saying adequate food, water, and shelter.

THE COURT: Mr. McLain's question, though, was asking her if she had reviewed photographs. Now, what is your objection to the photographs that are already into evidence?

Mr. McLain, now, I'm assuming you're talking about the photographs that are already into evidence?

MR. MCLAIN: That's correct, Your Honor. She's

used them to help form an opinion on the welfare of the dogs.

THE COURT: So, Mr. Toney, what is your objection to the question if she's reviewed the photographs?

MR. TONEY: I think she's being asked if these dogs have violated the law. I think that's essentially what she's being asked, if Ms. Sheridan's violated the law.

THE COURT: That's not the question that he asked. I mean, do you have an objection to the question that he asked? Now, she's not going to give -- she's obviously not qualified to give a legal opinion, and that's not the question before the Court.

MR. TONEY: I think that's essentially what she's being asked.

THE COURT: Well ---

MR. TONEY: And she's not -- there's been no testimony that she's been to the scene. There's been no testimony that she's been -- that's she able to give this kind of opinion.

THE COURT: Well, Mr. Toney, an expert is entitled to inform the trier of fact what things the expert relied on to form their opinion, so I'm going to overrule your objection and I will allow the question.

MR. TONEY: May I use the restroom for a minute, please? I beg your pardon.

THE COURT: Okay. Take five minutes.

(WHEREUPON, court stood at ease.)

THE COURT: Okay. Mr. Bailiff, if you'd go get our jury, please, sir.

(WHEREUPON, the jury entered the open court at approximately 2:55 p.m.)

THE COURT: Mr. McLain, proceed.

DIRECT EXAMINATION

CONTINUED BY MR. MCLAIN:

Q. Dr. Powell, have you, in the course of your job -- I know you've said you've brought in animals -- or you examined animals. Have you had the opportunity to review photographs of the living conditions that the animals that you received at PAWS were living in ---

A. Yes, sir.

Q. --- prior to March 18th?

A. Yes, sir.

Q. And did those photographs aid you in coming to an opinion on the welfare of those animals?

A. They very much informed my opinion.

Q. Specifically, did you examine an animal with the identification number A25190867?

A. If you would give me the last four digits again,

please, sir?
Q. 0867.
A. Yes, sir, I did.
Q. And what was the results of your examination?
A. This was a Labrador Retriever mix. It had a little bit of hair loss, but it was determined that was mostly from old fight or bite wounds and didn't require any treatment. We gave it a microchip to track it through the clinic, and we vaccinated it.
Q. And did you begin any further treatment on that day?
A. Just monitoring for any medical issues that might arise.
Q. And based on your examination the animal, the review of the living conditions and your expert opinion, had that animal been provided with the necessary sustenance and shelter?
A. This one, yes, sir.
Q. And did you have the opportunity to examine an animal with the last four digits of the ID number 0921?
A. Yes, sir.
Q. And what were the results of your examination of that animal?
A. This was a Border Collie mix. It was very thin on intake. Responded very well to regular diet and clean housing.

Q. Have you continued to treat that animal?
A. It required no further treatment other than daily maintenance.
Q. Is that animal still at PAWS now?
A. Yes, sir.
Q. And has its condition improved over the last eight months?
A. It reached a normal healthy condition and has maintained it.
Q. And based on your examination of the animal and review of the living conditions, in your expert opinion, had that animal been provided necessary sustenance?
A. In my opinion, it was either provided insufficient sustenance or sustenance of too poor a quality to maintain normal body weight.
Q. And did you examine a dog with the last four digits of the ID number 0992?
A. Yes, sir.
Q. And what were your results of the examination?
A. This animal was a Shepherd mix. It appeared to be normal. We have just maintained it. Vaccinated it. Taking care of it. It was in good shape when he came in; it continues to be in good shape.
Q. And you have continued to treat this dog over the last eight months?

A. Yes. Any medical issues that come up with any of these dogs are addressed when they occur.
Q. And based on your examination of this dog and a review of the living conditions it was staying in, in your expert opinion, had this dog been provided with the necessary sustenance and shelter?
A. Sustenance and shelter, yes.
Q. Did you examine a dog with the last four 1083?
A. Yes, sir. This was a Rottweiler mix dog. At presentation it was normal. We kept it vaccinated. We microchipped it. It showed up normal. It's continued to be normal. Required no further treatment.
Q. And have you continued to treat this dog?
A. We've continued to maintain its health.
Q. Has its condition improved at all over the last eight months?
A. It has maintained a good condition.
Q. And based on the examination and the review of the living conditions, in your expert opinion, had that dog been provided with the necessary sustenance and shelter?
A. Yes, sir.
Q. Did you examine a cat with the last four 1201?
A. Yes, sir.
Q. And what were the results of those examinations?
A. This was a gray and white domestic short-hair mixed

cat. It had advanced dental disease. But other than that ---

Q. Do you continue to treat the animal?

A. We have. We do not have the resources to do dental cleaning, but we have maintained it on soft, easy-to-eat food.

Q. And based on your review of living conditions and your examination, was this animal provided necessary sustenance and shelter?

A. I have seen photos of the living conditions that the cats were in. I would have to say no. Even though the cat was normal, the living conditions were sub-par.

Q. Did you examine a cat with the last four of 1266?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was a gray domestic medium-hair cat. He had skin irritations. He had severe crusting on the eyes, around the nose, the chin, the neck, and around the base of his tail at the anus and the genitals. It was intensely itchy and painful. I have had to continuously address his issues. It seems to be a food allergy. We order and feed him a special diet. Periodically, I have to treat him for flare-ups just to keep him comfortable.

Q. And has his condition improved at all in the last eight months?

A. Yes.
Q. And based on your examination of the dog [sic] and the living conditions, in your opinion was this cat provided the necessary sustenance and shelter?
A. He was in good flesh when I saw him. Again, the pictures that I saw of the living conditions were substandard.
Q. Did you review a cat with the last four of 1310?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a light cream colored domestic medim-hair. It presented with upper respiratory disease. It had dark green discharge, crust, weepy eyes, red eyes, discharge from the eyes. The conditions from which -- he was just exposed to other cats; other cats were exposed to this cat. He responded very, very well to antibiotic treatment and isolation.
Q. And based on continued treatment, has his condition improved over the last eight months?
A. Yes, sir.
Q. And in your opinion, based off of the examination of the cat, the treatment plan, the living conditions you reviewed, was this cat provided necessary sustenance and shelter?
A. Perhaps necessary sustenance, but substandard

housing. And I did not get any evidence, any indication, that his upper respiratory had been addressed.

Q. Did you review a cat with the last four of 1384?

A. Yes, sir.

Q. And what was the result of that examination?

A. This is a black-and-white domestic short-hair. It was in good flesh and in good shape and has continued to be in good shape. It also was housed in what we've referred to as the cat house. Just cats in and out and exposed to each other.

Q. Based on your examination of not only the animal but the living conditions, what is your opinion on whether or not that cat had been provided necessary sustenance and shelter?

A. It appeared to have had enough food to maintain normal body weight. The housing conditions were substandard.

Q. Did you examine a cat with the last four of 1450?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was a calico short-haired cat. Her examination normal. I do think she was a little pudgy. She did have a scar that indicated she'd been previously spayed. She did not come in with any health or medical issues and continues to thrive.

Q. And based on your examination and review of living conditions, in your expert opinion, had that cat been provided necessary sustenance and shelter?
A. Sustenance perhaps. Shelter substandard.
Q. Did you examine a dog with the last four of 1558?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a female Shepherd mix. Extremely unsocial. I did chip her, vaccinate her. She tested negative for heart worms. Hands on have been kept to a minimum. We handle her with kid gloves. She's still unsocial.
Q. Has her condition improved at all over the last eight months?
A. She's put on more flesh, but she is still unsocial.
Q. And based off of your review of the living conditions and your examination of that dog, in your opinion, had that dog been provided the necessary sustenance and shelter?
A. It appeared to have had the necessary sustenance and shelter.
Q. And did you examine a dog with the last four or 1668?
A. Yes, sir.
Q. And what were the results of that examination?
A. I found hair loss. Again, this was a black Lab mix

male dog. They seemed to be old rough and tumble dog play wounds. They did not require further treatment.

Q. Have you continued to treat that dog?

A. We have maintained his health. He's in good flesh.

Q. And based off your review of the living conditions and examination of the animal, in your opinion, had that dog been provided the necessary sustenance and shelter?

A. Yes, sir.

Q. Did you examine a dog with the last four of 1717?

A. Yes, sir.

Q. And what were the results of that examination?

A. It had some hair loss, again, from rough and tumble play with other dogs. Other than that, it was in good flesh and was healthy.

Q. Do you continue to treat this dog?

A. We've maintained his condition.

Q. And in your opinion, had that dog been provided necessary sustenance and shelter?

A. This particular dog, yes, sir.

Q. Did you examine a dog with the last four of 1767?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was a male, appeared to be a Pit Bull/Basset Hound mix. This dog was also very unsocial. More of a timid, scared of everything unsocial than an aggression

antisocial. We chipped and vaccinated it. Tested negative for heart worms. Its health has improved. It will interact with a couple of members of staff, but with everybody else, he runs to the back of the cage and hides.

Q. And in your opinion -- based on your examination, in your opinion, had that dog been provided the necessary sustenance and shelter?

A. It seemed to have been, yes, sir.

Q. Did you examine a dog with the last four of 1840?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was a black Lab mix. There were no abnormalities, no issues with him. We vaccinated him and microchipped him.

Q. Do you continue to treat?

A. We continue to maintain him, yes, sir.

Q. And in your opinion, had that dog been provided necessary sustenance and shelter?

A. Yes.

Q. And did you examine a dog with the last four of 1896?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was another antisocial dog or unsocial.

Healthy but continues to be iffy to handle. There's nobody on staff that it has accepted.

Q. And based on your examination, did you form an opinion on whether or not this dog had been provided the necessary sustenance and shelter?

A. Sustenance and shelter.

Q. Did you examine a dog with the last four of 1986?

A. Yes, sir.

Q. And what were the results of that examination?

A. It was a Labrador mix. He had old scars from previous dog fights, roughhousing. Other than that, there were no medical issues on presentation.

Q. And had that dog been provided necessary sustenance and shelter?

A. Seemed to have been.

Q. Did you examine a cat with the last four of 2038?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was a white domestic medium-hair cat. It also had a severe upper respirator infection similar to the previous sick cat that I had seen. We have cleaned it up, treated it and is thriving today.

Q. And its condition has improved in the last eight months?

A. Yes, sir.

Q. Based on your view of the living conditions and your examination of this cat, what is your opinion on whether or not it had been provided necessary sustenance and shelter?
A. Necessary sustenance, substandard shelter.
Q. Did you examine a cat with the last four of 2090?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was another white domestic medium-hair. It also had upper respiratory infection like the other two cats. Had an old orthopaedic injury to the left-rear leg. It walks funny. It's an old healed fracture.
Q. Have you continued to treat this animal?
A. We treated the upper respiratory disease, and the cat is thriving today.
Q. And based on your review of the living conditions and your examination of the cat, do you have an opinion on whether or not it had been provided necessary sustenance and shelter?
A. Necessary sustenance, substandard housing.
Q. Did you examine a dog with the last four of 2160?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a brindle and white Chow mix dog. It had no medical issues or concerns on presentation. We

continue to maintain it.
Q. And in your opinion, had that dog been provided necessary sustenance and shelter?
A. Yes, sir.
Q. Did you examine a dog with the last four of 2203?
A. Yes, sir.
Q. And what were the results of that examination?
A. The dog was in good condition on presentation. No medical issues or concerns.
Q. And in your opinion, had that dog been provided necessary sustenance and shelter?
A. Yes, sir.
Q. Did you examine a dog with the last four of 2268?
A. Yes, sir.
Q. And what were the results of that exam?
A. This was a senior dog, a Chihuahua, a little white and black Chihuahua. Other than age-related changes, there were no medical issues or concerns with this puppy.
Q. And in your opinion had that dog been provided necessary sustenance and shelter?
A. Necessary sustenance. Possibly it had -- the area in which it was kept was not the most sanitary or the healthiest.
Q. Did you examine a dog with the last four of 2316?
A. Yes, sir.

Q. And what were the results of that examination?
A. This was a chocolate Cocker Spaniel. It was emaciated. Hair loss over eighty percent of its body. It had mange caused by a mite that gotten down to the hair follicles. This condition had gone on so long that it had such deep skin infection on top of the mites that there are actually pits and holes and crust and craters on this dog's body that were both itchy and painful.
Q. And have you continued to care for and treat this dog?
A. Yes, sir. We treated the deep skin infection. That has cleared up. We have treated the Demodex mite. That infection has cleared up. Every hair follicle that was capable of regrowing hair has regrown hair. He's put on flesh, and he's thriving.
Q. And based on your examination of this animal and the animal's living conditions, in your opinion, had this dog been provided sustenance and shelter?
A. Necessary sustenance -- I'm sorry. No sustenance. Either poor quality sustenance or not enough of the good stuff. And there was no evidence that it had been given medical care for its condition.
Q. Did you examine a dog with the last four of 2362?
A. Yes, sir.
Q. And what were the results of that examination?

A. This was mostly a Maltese mix, a little white dog. There were no medical issues or concerns on presentation. It continues to be healthy.

Q. And in your opinion, had that dog been provided the necessary sustenance and shelter?

A. Probably good sustenance. It was in good shape. The area that it was removed from was unsanitary.

Q. Did you examine a dog with the last four of 2428?

A. Yes.

Q. And what were the results of that examination?

A. This was a Terrier Beagle mix. It was healthy on presentation. There have been no medical concerns or issues since.

Q. And in your opinion, had that dog been provided the necessary sustenance and shelter?

A. Yes, sir.

Q. Did you examine a dog with the last four of 2487?

A. Yes, sir.

Q. And what were the results of that examination?

A. There were no medical concerns or issues on presentation, and there continue to be no concerns or problems with this dog.

Q. And in your opinion, had that dog been provided necessary sustenance and shelter?

A. It appeared to be, yes, sir.

Q. Did you examine a dog the last four of 2562?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a senior Shih Tzu missing the majority of its hair. It had a condition called dry eye where the eyes just do not produce enough tears, the front of the eyeball itself. This had gone on so long that it had pigmented over. The dog was functionally blind. It has no hair. The skin, in an effort to protect itself has gotten -- it looks like elephant skin. This is end-stage. That skin is never going to be healthy. We continue to treat this dog with twice weekly medicated baths. We treat it with twice daily artificial tear ointments. We're keeping him comfortable is what we are. We cannot reverse any of the skin damage or the skin changes.
Q. Had the -- more specifically on the dry eye, had that been treated earlier, would the be dog blind now?
A. It could have been controlled. This breed is prone to it. You typically cannot reverse it, but you can keep them comfortable.
Q. In your opinion, had this dog been provided the necessary sustenance and shelter?
A. Sustenance, yes. The area from which it was removed was unsanitary, and he was -- we had to clip hair and

pick crust off his eyes to even see what the eyes looked like when he was presented.

Q. Did you examine a dog with the last four of 2634?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was on a Husky Retriever mix. There were no medical issues or concerns on presentation, and there continue to be no concerns.

Q. In your opinion, had that dog been provided necessary sustenance and shelter?

A. Yes, sir.

Q. Did you examine a dog with the last four of 2678?

A. Yes, sir.

Q. And what were the results of that examination?

A. It was a long-coated, long-haired Chihauhau mix. There were no medical issues on presentation, and there continue to be no medical issues or concerns.

Q. In your opinion, had that dog been provided the necessary sustenance and shelter?

A. Seemed to have been, yes, sir.

Q. Did you examine a dog with the last four of 2744?

A. Yes, I did.

Q. What were the results of that examination?

A. This was a chocolate Pomeranian mix. Looks like a little fox. She was pregnant. She delivered three

puppies on April the 24th. Mother did well; the puppies did well. They continue to do just fine.

Q. And based on your review of the living conditions of this animal and your examination of the animal, had it been provided necessary sustenance and shelter?

A. Sustenance, I would have to say yes. She delivered normal puppies and had normal milk. Was able to nurse everybody. Shelter, where she was housed was inappropriate for a pregnant dog.

Q. Did you examine a dog with the last four of 2785?

A. Yes, sir.

Q. What were the results of that examination?

A. This was the liver and white Pomeranian mix. This also had mange caused by the Demodex mite. Hair loss around the eyes, under the neck, on the feet. We were able to -- we have treated that. No more issues with it since.

Q. And its condition has improved?

A. Oh, yes.

Q. Based on your examination of this dog and review of the living conditions, had this dog been provided necessary sustenance and shelter?

A. Seemed to have been, yes, sir.

Q. Have you examined -- did you examine a dog with the last four of 2840?

A. Yes, sir.
Q. And what were the results of that examination?
A. This was a Beagle mix. She was quite obviously nursing. The enclosure she was in had her puppies in there. It was the same enclosure in which the hairless emaciated Cocker Spaniel was in. So you had a mother dog, nursing puppies with an unrelated male, one food source. Not appropriate conditions for a nursing animal. She weaned them soon after we brought her up. The puppies are still doing wonderfully, and mom is doing fine now.
Q. Based on your examination of this dog and review of the living conditions, was this dog provided the necessary sustenance and shelter?
A. Necessary sustenance, but the housing conditions were substandard.
Q. Did you examine a dog with the last four of 2875?
A. Yes, I did.
Q. And what were the results of that examination?
A. This dog also was pregnant. This was a difficult pregnancy. It required an emergency caesarean section on the 6th of April. She had six puppies. All but one died. That one puppy is still doing okay. She was not producing any milk whatsoever. From indications, she went into labor and then stopped. She just didn't have

it in her to complete the puppies. We had to go in to try to save everybody. We managed to save one puppy. She never showed any kind of maternal instinct. She didn't want anything to do with the remaining puppy. It had to be hand reared from hour zero.

Q. And based on your review of the living conditions this dog was in and your examination, in your opinion had this dog been provided necessary sustenance and shelter?

A. I don't think so because if she had the sufficient nourishment, she would have been able to have a healthier pregnancy and been able to nurse her puppies. And better health will better support maternal instincts. We might have had more than one puppy make it out of the litter of six.

Q. Did you examine a dog with the last four of 2952?

A. Yes, sir.

Q. And what was the result of that examination?

A. This was a healthy puppy. It was born to the Beagle that was in the enclosure with the hair loss, scrawny Cocker Spaniel.

Q. And based off your review of the living conditions and examination, had that dog been provided necessary sustenance and shelter?

A. It had been nursing mom, so it was a rolly-polly little puppy. The housing conditions, puppies should

really not be exposed to unrelated male dogs.
Q. Did you examine a dog with the last four of 3007?
A. Yes.
Q. And what were the results of that examination?
A. This was another one of the puppies of the Beagle mom in the enclosure with the Cocker Spaniel. Same issues. It had been nursing mom, so it was getting enough sustenance from her. But the housing conditions were substandard.
Q. And did you review a dog with the last four of 3060?
A. Yes, sir.
Q. And what were the results of that examination?
A. Gray and white Pomeranian mix. No issues on presentation other than a matted overgrown hair coat and nails. He's since been groomed several times. He's doing well. He's thriving.
Q. Has his condition improved?
A. Oh, yes. Yes, sir.
Q. And based on your review of the living conditions and your examination, had this dog been provided the necessary sustenance and shelter?
A. Sustenance, yes. He was in an area that was substandard.
Q. Did you examine a dog with the last four of 3105?
A. Yes, sir. This is another puppy in the litter of

the Beagle in the cage with the Cocker Spaniel. Same things apply. It was receiving enough sustenance from the mother. And unfortunately, it was housed with an adult male dog with medical issues.

Q. Did you examine a dog with the last four of 3144?

A. Yes, sir. Another puppy, same litter.

Q. And what were the issues again for this dog?

A. The issue -- sustenance was fine was because it was still nursing the mother dog. It was housed with an adult male dog unrelated with medical conditions.

Q. Did you examine a dog with the last four of 3204?

A. Yes, sir.

Q. What were the results of that examination?

A. This was another puppy. Same issues. Same concerns.

Q. And what could happen to those puppies being penned up with an unrelated male dog?

A. Some male dogs don't care for puppies. They'll try to kill them. They can be too rough with them. These puppies were exposed to the feces from the male dog. And whatever issues -- there's no way to look at a dog with hair loss and determine whether that is a mange that's contagious or a mange that is not. That's a microscopic diagnosis. So this dog with a potentially contagious skin condition was put in with a nursing mom and puppies.

There was one food source, so that's even more dangerous if you've got a thin dog that's going to guard the food source and protect it.

Q. Did you examine a dog with the last four of 3246?

A. Yes, sir.

Q. And what were the results of that examination?

A. This was another one of the puppies.

Q. That was housed with the adult male dog?

A. Yes, sir.

Q. Did you examine a dog with the last four of 3314?

A. Or 3319?

Q. I'm sorry. 3319?

A. Yes, sir, I did.

Q. And what were the results of that examination?

A. This was a Dachshund mix. It had hair loss. The skin was infected to the point where it was cracked. There were craters. There were pits where the infection and the ooze had just eaten away and burned down through the skin. I'd say easily sixty percent of the hair was gone. All of the skin was infected. It turned out to have the non-infectious form of mange. It responded well to aggressive antibiotic treatment and treatment for mange. It's grown back as much hair as it is possible for the dog to grow back.

Q. Have you continued to treat this for the last eight

months?
A. Yes.
Q. And its conditions have improved?
A. Yes, sir.
Q. And based on your review of the living conditions and the examination of the animal, in your opinion, had this dog been provided necessary sustenance and shelter?
A. Necessary sustenance perhaps. Dogs with hair loss -- this dog was at-large running around with some other animals. It's not a good idea to have a potentially contagious skin condition exposing other dogs.
Q. Did you examine a dog with the last four of 3365?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a black miniature Schnauzer mix. There were no medical concerns or issues on presentation, and there continue to be no concerns.
Q. Do you have an opinion on whether or not this dog had been provided the necessary sustenance and shelter?
A. He seemed to have been provided with the necessary sustenance and shelter.
Q. Did you examine a dog with the last four of 3435?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was maybe a Pomeranian Dachshund mix. It was

difficult to tell. This dog has had extensive hair loss, again, over sixty percent of its body. Deep-seated skin infection. Pits, craters, intense itchiness and pain. Turned out to have the non-contagious form of mange. Responded very well to treatment with antibiotics and treatment for the mange.

Q. And based on your examination of this dog -- well, first let me ask. Do you continue to treat this animal?

A. Yes.

Q. And has its condition improved over the last eight months?

A. Yes, sir.

Q. And based on your examination of the dog and its living conditions, in your opinion, had this dog been provided the necessary sustenance and shelter?

A. Sustenance, yes; shelter, no. Again, this was another hair-loss dog that was roaming around mixing with other animals and had access to the house where the cats were kept.

Q. And did you examine a dog with the last four of 3483?

A. Yes, sir.

Q. What were the results of that examination?

A. It was a young Pit Bull mix. It was maybe half grown. There were no issues or concerns on presentation,

and there continue to be no concerns.
Q. In your opinion, had that dog been provided the necessary sustenance and shelter?
A. Yes, sir.
Q. Did you examine a dog with the last four of 3619?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a large Boxer mix. This dog had a severe hookworm infection. And hookworms actually attach to the lining of the intestine straight to the blood supply, so it can be pretty devastating. We de-wormed him, and he has continued to thrive since.
Q. Is there any way to know if a dog has hookworm other than doing a test at your office?
A. It's a microscopic diagnosis.
Q. Based on your review of the living conditions and the examination, do you have an opinion as to whether or not this dog had been provided necessary sustenance and shelter?
A. Sustenance and shelter, perhaps. The issue of parasites had apparently not been addressed.
Q. And how is hookworm prevented?
A. By keeping the feces out of the area that the dog is living, prompt daily cleaning of feces, de-worming. Most monthly heart worm preventions contain an ingredient that

will go through and kill any worms the dog may have picked up in the previous month. It is possible to keep dogs free of hookworms easily and cheaply.

Q. Did you examine a dog with the last four of 3648?

A. Yes, sir.

Q. What were the results of that examination?

A. There were no medical issues or concerns on presentation, and there continue to be no concerns. She was in heat when she came in, but that's not a concern.

Q. And do you have an opinion as to whether or not this dog had been provided necessary sustenance and shelter?

A. She seemed to have been provided with that, yes, sir.

Q. Did you examine a dog with the last four of 3695?

A. Yes, sir.

Q. What were the results of that examination?

A. This is a black Basset Hound mix, possibly some Labrador in there. He was normal. There were no issues or concerns on presentation, and there continue to be no issues or concerns.

Q. Had this dog been provided the necessary sustenance and shelter?

A. It seemed so, yes, sir.

Q. Did you examine a dog with the last four of 3730?

A. Yes, sir.

Q. What were the results of that examination?
A. There were no medical concerns or issues on presentation. It was a young dog, teenage dog, if you will. There continue to be no issues or concerns.
Q. Do you have an opinion as to whether or not that dog had the necessary sustenance and shelter?
A. Seemed to have been provided with some, yes, sir.
Q. Did you examine a dog with the last four of 3760?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a mostly white Border Collie mix. There were no medical issues on presentation, and there continue to be no medical issues.
Q. And had that dog been provided the necessary sustenance and shelter?
A. I believe so, yes, sir.
Q. Did you examine a dog with the last four of 3789?
A. Yes, sir.
Q. And what were the results of that examination?
A. A black Labrador. No medical concerns or issues on presentation, and there continue to be no concerns or medical issues.
Q. And do you have an opinion as to whether or not that dog had necessary sustenance and shelter?
A. Seemed to have been provided with some, yes.

Q. Did you examine a dog with the last four of 3820?
A. Yes, sir.
Q. What were the results of that examination?
A. This was a Cocker Spaniel/Poodle mix. No issues or concerns on presentation. She has required several groomings. Her hair cut tends to mat. But other than that, she's doing well.
Q. In your opinion, had this dog been provided the necessary sustenance and shelter?
A. I believe so.
Q. Did you examine a dog with the last four of 3869?
A. Yes, sir.
Q. And what were the results of that examination?
A. This was a Cairn Terrier mix, cream colored. Looked like a blonde Toto. There were no concerns on presentation, and there continue to be no concerns or issues.
Q. And in your opinion, had that dog been provided the necessary sustenance and shelter?
A. Yes, sir.
Q. Did you examine a dog with the last four of 3933?
A. Yes, sir.
Q. What were the results of that examination?
A. He was entered as being injured. The only injury I could find was an old healed scrape on his right hip.

Other than that, he seemed to be in good condition.
Q. Based on your review of the dog's living conditions, had that dog been provided the necessary sustenance and shelter?
A. Seemed to have been, yes, sir.
Q. Did you examine a dog with the last four of 4014?
A. Yes, sir.
Q. What were the results of that examination?
A. Another Labrador Retriever mix, black Lab mix. Had some old wounds to his face and to his left rear leg. Looked to have been the result of maybe a minor dog fight or roughhousing with other dogs. Other than that, he seemed to be in good shape.
Q. And in your opinion, had that dog been provided the necessary sustenance and shelter?
A. Seemed to have been, yes, sir.
Q. Did you examine a dog with the last four of 4150?
A. Yes, sir.
Q. What were the results of that examination?
A. This is a white-and-black spotted Basset Hound mix. There were no medical issues or concerns on presentation, and there continue to be no medical issues or concerns.
Q. In your opinion, had that dog been provided the necessary sustenance and shelter?
A. Yes, sir.

Q. Did you examine a dog with the last four of 4176?
A. Yes, sir.
Q. What were the results of that examination?
A. Well, this was a Boxer mix. He would be called iffy. You have to be careful approaching him and handling him. Other than that, there were no medical concerns or issues with him.
Q. In your opinion, had that dog been provided necessary sustenance and shelter?
A. Seemed to have been, yes, sir.
Q. Did you examine a dog with the last of 4220?
A. Yes, sir.
Q. What were the results of that examination?
A. This was a small Rottweiler mix-looking dog. There were no medical concerns or issues on presentation.
Q. Did you form an opinion as to whether or not this dog had had the necessary -- had been provided the necessary sustenance and shelter?
A. Necessary, yes.
Q. Did you examine a dog with the last four of 4275?
A. Yes, sir.
Q. What were the results of that examination?
A. This was an adult male Doberman Pinscher. He was very thin. He had hookworms, he had whip worms, both of which actually latch onto the lining of the intestine

right into the blood supply. And he had coccidia, which is another intestinal parasite that can cause diarrhea and loss of condition.

Q. What causes -- we know what hookworms are. What causes a dog to get -- what did you say?

A. Hookworms, whip worms and coccidia. Unsanitary conditions. They can pick them up from another dog's stool.

Q. And based on your examination of the dog and review of the living conditions, had this dog been provided the necessary sustenance and shelter?

A. It was difficult to tell whether he had had either a poor diet, an insufficient diet or whether the diet was unable to keep up with the intestinal parasites.

Q. Did you examine a dog with the last four of 4306?

A. Yes, sir.

Q. And what was the result of that examination?

A. This is a Welsh Corgi mix, a small male dog. He did test heart worm positive. Other than that, there were no other medical issues or concerns on presentation.

Q. And how do you go about preventing heart worm?

A. There are a number of monthly heart worm preventions on the market. It is very easy and very inexpensive to keep a dog on heart worm prevention.

Q. How does a dog wind up getting heart worms?

A. From mosquitos. And a heart worm infected dog has baby heart worms that live in the blood vessels on the outside of the body. When a mosquito takes a blood meal, it sucks up some of the baby heart worms with it. When it goes and it bites another dog while it is -- when it bites, the baby heart worms go into that dog, and the whole cycle starts up again. What the heart worm prevention does is it goes through once a month and kills the baby heart worms before they have time to get to the right chamber of the heart and mature and start having more babies.

Q. And based on your examination of this dog and a review of its living conditions, had this dog been provided the necessary sustenance and shelter?

A. Sustenance and shelter, yes.

Q. Did you examine a dog with the last four of 4334?

A. Yes, I did.

Q. And what were the results of that examination?

A. This was obviously a very pregnant Chihauhau mix dog. She required an emergency C-section on the 31st of March. We were able to save five of the six puppies. One was stillborn. This was a case of she got so far into labor and did not have the wherewithal to continue delivering the puppies.

Q. And based on your review of this dog's living

conditions and your examination, had this dog been provided the necessary sustenance and shelter?

A. Sustenance, perhaps. She was housed inappropriately for a pregnant dog.

Q. Did you examine a dog with the last four of 4366?

A. Yes, sir.

Q. What were the results of that examination?

A. This was another Pomeranian mix. It also had severe hair loss. It had the non-contagious mange. It had skin infection to the point where the skin was cracking. It was blistering. There were craters. There were pits. I had to sedate this dog to do an exam, he was so painful. We have since treated him. He has grown hair back where he has healthy follicles, but he continues to need routine clipping.

Q. And has his condition improved over the last eight months?

A. It has improved.

Q. Based on your examination of the dog and review of the dog's living conditions, had that dog been provided necessary sustenance and shelter.

A. Sustenance, perhaps. The place where the dog was housed was substandard.

Q. Dr. Powell, I'm showing you what's been entered as State's Exhibit Number 4.

A. Okay.
Q. Have you had an opportunity to review this picture?
A. Yes, sir.
Q. What, if anything, sticks out in this picture to you?
A. The broken wire on the cage, the diagonal panel of the cage.
Q. And why is that an issue?
A. The sharp ends of the wire are exposed. The dog is, for some reason, chained inside an enclosure. There's old feces, there's new feces, in the picture.
Q. And what can the presence of old feces or new feces inside an enclosure like that ---
A. That there's not daily cleaning.
Q. And why is that unhealthy for an animal?
A. Because feces grow all kinds of nasty stuff. They grow bacteria. They attract wildlife. They spoil. If he has worms, he will just continuously reinfect himself, even if you start treating him. You've got to get -- you've got to take feces away. It's just unsanitary.
Q. Dr. Powell, I'm now showing you what the State entered as State's Exhibit Number 5.
A. Okay.
Q. What, if anything, sticks out to you in this photograph?

A. This is the same dog. He is crawling through the broken wire with a chain attached to his neck. That's a choking hazard. If the feces are not being removed routinely, I question whether anybody would catch a choking incident in time to help the dog, save the dog.
Q. This is State's Exhibit Number 6. What, if anything, sticks out to you in this photograph?
A. The amount of feces left there. You've got some that are no less than three days old. The dog is up on top of his house. There is protection from the elements coming down, but no protection unless he goes up in that box from anything blowing from either side. And if it's coming from the front of the box, it's just going to blow straight in.
Q. Dr. Powell, this is State's Exhibit Number 8. What, if anything, sticks out to you in this photograph?
A. This is an area where a lot of the smaller dogs were housed. The dog here in the foreground is one of the ones that had issues with mange. The brown things to the right of it are feces. They were all living and defecating in this same area. This is where two of the pregnant dogs were housed.
Q. And why is that unsanitary?
A. Feces are a source of infection. They're a source of parasitic infection. Mother dogs should not be --

they should be by themselves.
Q. Dr. Powell, this is State's Exhibit Number 15. What, if anything, stands out to you in this picture?
A. The amount of feces. This cage backs up on -- you could have wildlife underneath that run. You could have if coming in from the side. I'm mostly concerned with rats and mice. They carry a disease call leptospirosis which can cause kidney failure. You've got an excellent attractant sitting there with the feces, not to mention the spread of parasites and bacteria.
Q. This is State's Exhibit Number 17. What, if anything, sticks out to you in this photograph?
A. Working from the outside in, the flooring is not one that you could disinfect. There's no way to sanitize or disinfect that flooring. We have one of the Dachshunds that had severe mange and deep skin infection sharing living space with one of the cats. There's no way anybody can look at that picture and tell whether that was contagious or non-contagious. If you don't know if it's contagious, don't let the animal mix it up with other animals.
Q. Dr. Powell, this is State's Exhibit Number 18. What, if anything, sticks out to you about this?
A. Just the filth and debris.
Q. And would that be a sanitary area for a dog to live

in?

A. That's not a sanitary area for any living creature to live in.

Q. This is State's Exhibit Number 19.

A. The same. That's unsanitary. That's filthy.

Q. This is State's Exhibit Number 20. What, if anything, sticks out to you in this photograph?

A. The amount of feces on the floor, and the flooring does not seem to be the kind of floor that you could sanitize or disinfect easily.

Q. Why is that so important?

A. Well, if you've got animals -- if you've got a rotating population of animals -- say a group of dogs comes in, does all this. Then you have new dogs coming in. Well, everybody's exposed to whatever everybody else before them has. It's like children in a daycare. If you mix everybody in, they're going to share germs. They're going to share parasites.

Q. State's Exhibit Number 22?

A. It's a feces-crusted floor.

Q. And in your opinion, is there any way to sanitize it?

A. No, sir. No, there's no way to sanitize that.

Q. This is State's Exhibit Number 24?

A. Again, this is filthy. The floor does not appear to

be a surface you could sanitize or disinfect. So it just goes on and on as a source of infection and contamination.

Q. This is State's Exhibit Number 25. What, if anything, sticks out to you about this photograph?

A. Dirty cages, soiled furniture, soiled flooring. I can't even begin to tell what some of the items on the floor are. There's no way to disinfect a recliner.

Q. Would it be sanitary for a dog to even be in that room much less live in that room?

A. No. For people to go in there, we have to wear personal protective gear -- I mean, boots, hats, the whole nine yards -- before we can go in a place like that.

Q. And this is State's Exhibit Number 26?

A. We have a food bowl next to a garbage bag next to the feces on the floor. Again, the floor is material that you cannot disinfect or sanitize. I see at least three different kinds of flooring in that picture.

Q. And State's Exhibit Number 27?

A. We have a cleaning bucket next to food bowls. There's an upturned bowl. I don't see any water bowls. The flooring is filthy and is not a material that can be sanitized or disinfected well.

Q. Would it be sanitary for any dog to even be in that

room?

A. No, sir. Could you put that one back up again, please, sir? My other concern is the space heater. When one's in that condition, I have to question a fire hazard, electrical hazard with one being put in a house like that.

Q. This is State's Exhibit Number 28?

A. This is the Cocker that was emaciated, that was thin. That was the only bowl of food in that enclosure. Up underneath the table on your right, you can see one of the puppies. There appear to be puppy training pads, feces in there. This picture doesn't show it. One other does. The mother is off underneath the white table to the left. But we've got the puppy mixing it up with a dog with skin issues, one source of food and who knows whose feces mixed all in there.

Q. And this is State's Exhibit Number 29?

A. This also -- you can see the mother dog down underneath the red triangle.

Q. And remind the jury why it's not safe for the mother and puppies to be with an unrelated male?

A. Unrelated males frequently will like to kill the puppies, especially given the trigger of if there's one food source and I'm very, very thin.

Q. State's Exhibit Number 30. Is this the same animal

that's pictured in that previous picture?
A. Yes, sir. That's the Cocker Spaniel.
Q. And that animal has received adequate medical care for the past eight months?
A. Yes, sir.
Q. And what is that animal's condition now?
A. Where he's got healthy undamaged hair follicles, he has grown new hair. We continue periodically to have to treat his eyes. He does have a little bit of dry eye. But other than that, he's bouncing off the walls. He's a happy Cocker Spaniel.
Q. So you wouldn't consider this a -- basically a dog hospice patient?
A. No. It's a chronic medical condition, but it is not an end-of-life condition.
Q. This is State's Exhibit Number 32?
A. This is one of the mange Dachshunds. All the areas on there that you see that are black or spotted black, when we peeled the scabs up, it was raw, oozing, bleeding wound, sometimes so deep that it looked like pits and craters. It's just roaming at-large in that room. The green object going from top to bottom is a drop cord. That concerns me because dogs chew. That's a hazard. That's a shock electrocution hazard.
Q. And have you continued to treat this animal?

A. Yes.
Q. And has this animal's condition improved?
A. Yes, sir.
Q. And this animal did not have an end-of-life condition?
A. No, sir. This is a chronic condition, but it is not an end-of-life condition.
Q. Dr. Powell, even the dogs that you examined that seemed healthy on the outside, was it sanitary for them to be living on a property like that with those conditions?
A. No, sir. No, sir. At the shelter, it takes us an average of ten minutes per animal to meet their daily needs. That includes washing the bowls, feeding them, cleaning where they defecated and urinated. That doesn't include addressing any medical conditions that crop up. It does not include taking them out and walking them around. I believe there were sixty animals on this premises. You're looking at ten hours just to meet their basic needs a day.
Q. So in your opinion, can one person meet the basic needs of sixty animals?
A. Not ten hours a day seven days a week, no, sir.
Q. Dr. Powell, I don't have any further questions at this time. If you'll answer any questions Mr. Toney has.

A. Certainly.

THE COURT: All right. Mr. Toney?

MR. TONEY: Yes, sir.

CROSS-EXAMINATION

BY MR. TONEY:

Q. This is a copy of your report, ma'am?

A. This one, this is a copy that staff makes when animals are taken in, yes, sir.

Q. These include your diagnoses or your reports?

A. These reports right here. This is just the intake exams, vaccinations that were given.

Q. And this was done by PAWS?

A. Yes, sir. They were all received at PAWS.

MR. TONEY: I move to introduce this as Defendant's Exhibit Number 2.

THE COURT: Any objection?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: All right. Defendant's Exhibit Number 2 will be admitted without objection.

(WHEREUPON, Defendant's Exhibit Number 2 was marked and admitted into evidence.)

Q. If I could summarize some of this. We have to go through most of this again.

A. That's fine.

Q. The analysis started at 0867?

A. The dogs start at 0867. The cats came in on two separate animal control officer trucks, so they're interspersed.

Q. Ma'am, you stated that 0867 has necessary sustenance and shelter?

A. Seemed to have been, yes, sir.

Q. And also 0992?

A. I've got -- okay. 0992, yes, sir.

Q. I'm skipping some.

A. 0921 is up next.

Q. I understand. I'm just going through the ones that you said had necessary sustenance and shelter.

A. Okay.

Q. 1083?

A. Yes, sir.

Q. 1558?

A. Yes, sir.

Q. 1668?

A. Yes, sir.

Q. 1717?

A. Yes, sir.

Q. 1846?

A. I have an 1840 and an 1896.

Q. I'm sorry. 1840 and 1896?

A. Yes, sir.

Q. And the next number, which confused me initially, was 1986. That one also was provided necessary sustenance and shelter by what you previously testified?
A. Yes, sir.
Q. And then 2038 provided necessary sustenance and shelter?
A. Yes, sir. That was one of the cats with upper respiratory.
Q. I'm not trying to go through all this, ma'am. I'm just trying to isolate the ones that you said had necessary sustenance and shelter, and then I'm going to ask you some questions on the other ones.
A. The 2038 cat was housed in the cat house. So it would not have had adequate shelter. It would have had substandard shelter.
Q. You said necessary sustenance and substandard shelter. And then 2160 ...
A. Yes, sir.
Q. ... had necessary sustenance and shelter?
A. Uh-huh (affirmative).
Q. 2203?
A. Yes, sir.
Q. 2268?
A. Yes, sir.
Q. Necessary sustenance and shelter. And then 2487 was

okay, sustenance and shelter?
A. 2487, yes, sir.
Q. 2634 was okay?
A. Yes, sir.
Q. 2678?
A. Yes, sir.
Q. Was okay?
A. Uh-huh (affirmative).
Q. All right. 2785?
A. This was one of the dogs that was housed in the -- with all the other little dogs in that first area, so that would have been substandard shelter.
Q. Okay.
A. It had shelter from the elements, but the shelter itself was substandard.
Q. All right. 3105, what was your answer on that one? That was a nursing Pomeranian?
A. That was one of the puppies, so that would have been substandard. It was in with the hairless Cocker.
Q. 3435 had necessary sustenance and shelter; correct?
A. I'm working my way down to it. 3435?
Q. Yes, ma'am.
A. This is one with hair loss that was in and out of the cat house. So, yeah, it had shelter from the elements, but it was substandard.

Q. 3483 had necessary sustenance and shelter?
A. Yes, sir.
Q. 3619, you said it had necessary sustenance and shelter. Perhaps issues with parasites were not addressed, so I'm going to keep that one off the list.
A. 3619?
Q. Yeah.
A. Correct.
Q. Even though you said had necessary sustenance and shelter.
3648 was fine?
A. Yes, sir.
Q. 3695 was fine?
A. Yes, sir.
Q. 3730 was okay?
A. Yes, sir.
Q. 3760 was okay?
A. Yes, sir.
Q. 3789 was okay?
A. Yes, sir.
Q. 3820 was okay?
A. Yes, sir.
Q. 3869, you said yes, but you also said there were some concerns?
A. Substandard, yes, sir.

Q. So I'm going to leave that off the list. 3933, you said yes?
A. Yes, sir.
Q. 4014, you said yes?
A. Yes, sir.
Q. 4150?
A. Yes, sir.
Q. 4176, you said yes?
A. Yes.
Q. 4220, there's no medical concerns or issues?
A. Correct.
Q. 4306, you said necessary sustenance and shelter, but you did say it had heart worms?
A. Had heart worms, yes, sir.
Q. I'll leave that off the list for now. 4336, you said it had necessary sustenance but housing was substandard?
A. Yes, sir.
Q. These, the numbers I just read through, does that appear to be all?
A. Yes, sir.

MR. TONEY: Move to introduce this sheet here as Defendant's Exhibit Number 3.

THE COURT: Any objection?

MR. MCLAIN: No objection, Your Honor.

THE COURT: Okay. So Defendant's Exhibit Number 3 would be admitted without objection.

(WHEREUPON, Defendant's Exhibit Number 3 was marked and admitted into evidence.)

Q. The issue with 0921?

A. The dog was thin.

Q. This is the ...

MR. TONEY: Judge, I'm sorry for sitting here.

Q. This is the thin dog?

A. Yes, sir.

Q. This dog had just gotten out of the hospital with parvo; correct?

A. I have no way of knowing that. I was not given any medical records or medical histories on any of these dogs.

Q. If the dog had gotten out of the hospital with parvo, it would normal and natural for a dog who'd just had parvo to be a little bit on the thin side; correct?

A. It would be. It would also be normal for that dog to be in isolation.

Q. Even if the dog didn't have parvo at that time?

A. It would still be normal and standard for it to be not in a herd of other dogs.

Q. As to the cat number 1201 ...

A. Yes, sir.

Q. ... that cat had advanced dental disease?
A. Advanced periodontal disease.
Q. All right.
A. Advanced periodontal disease.
Q. Periodontal disease?
A. Uh-huh (affirmative).
Q. How old is this cat?
A. I have it as a male adult. There's no way to age an adult cat by its teeth.
Q. So you can't tell the age?
A. No, sir.
Q. Do older cats have periodontal disease sometimes, or is it often?
A. Often. I could have a one-year-old cat with horrible periodontal disease and a fifteen-year-old cat that's had regular dental care. You can't tell by looking ---
Q. Just like people?
A. Just like with people.
Q. Yes, ma'am. Do you know the condition of this cat when she obtained this cat?
A. I have no way to know that.
Q. 1266 is another cat?
A. Yes, sir.
Q. And you said this cat had good flesh?

A. In good flesh, but it had some extensive skin issues.

Q. Crusty around the eyes, nose and itchy?

A. And the neck and underneath the tail and around the anus and around the genitals, it was tender and painful.

Q. This cat had a food allergy; right?

A. It has responded well to an ingredient-restricted diet.

Q. Which indicates that maybe something in its diet was causing it to have an allergic reaction?

A. Uh-huh (affirmative).

Q. Of course, you can't necessarily determine that unless you just examine the issue over and over again with one food after another; correct?

A. Right. You start off with what's called a novel diet of just a few ingredients, something very bland. He did respond to that.

Q. All right. You don't know how long she had this cat; correct?

A. No, sir.

Q. For example, if she took in these cats a few days earlier, that wouldn't necessarily be her fault, would it, if the cat had bad skin?

A. I could conjecture all day long. I just have to report on the fact as it was when I saw it.

Q. I understand. As to 1310, which is a cream colored cat ...

A. Yes, sir.

Q. ... you said it had necessary sustenance but substandard housing?

A. Yes, sir. All these cats were in one area. There were litter boxes near food bowls. The cats with upper respiratory disease were mingling with the cats that did not have respiratory disease. We had the one cat with skin issue mingling with all the other cats freely. Two separate body systems, potentially contagious -- one I know is contagious -- and they're all mixing it up together.

Q. And there's no state regulations on that, are there?

A. No, but there's common sense.

Q. But there's no state regulations or laws or manuals or procedures. There's nothing; right?

A. Cats are -- there is a leash law in Anderson County. These cats could come in and out of the building as they wished.

Q. But as far as policies and procedures and manuals -- don't mingle too many cats, don't do this with cats, don't have a cat with a respiratory illness with another one -- there's no rules on that, are there?

A. (No verbal response)

Q. There's no place where you can say here is the rule, here's a copy of it?
A. No, sir. There's no rules that say don't play in traffic either.
Q. Do you think it would be helpful if they made some rules on these things?
A. Sure, you can try to legislate stuff like that.
Q. 1384 was a black and white cat?
A. Yes, it was.
Q. You said there was enough food for this cat, but it had ---
A. The cat was in good flesh, but it was in the house mixing it up with the hair-loss cat and the upper-respiratory cats and the mange dogs that came in and out.
Q. These other cats and dogs or whatever that had mange, you can't tell if they're infectious because it's microscopic; right? You have to do a culture and do an analysis and look to see if it's an infectious variety?
A. Both the infectious and the noninfectious look alike. It's better to err on the side of caution to keep your hair-loss animals away from healthy animals.
Q. Okay. But there's no rule on that; right?
A. No.
Q. I mean, it would be possible to make rules on that; right?

A. Sure.
Q. I mean, even in the Old Testament, they had rules on if an animal has a diseased spot, it should go here; if it doesn't, it should go you go here. And there's other judicial codes that have rules on this; correct?
MR. MCLAIN: Your Honor, I don't see the relevance of what's ---
THE COURT: Sustained.
Q. 1450 is a calico cat?
A. Yes, sir.
Q. This cat had no medical issues; correct?
A. No, sir. It was in good flesh.
Q. You said it had adequate sustenance, but you said perhaps substandard shelter?
A. No. It was in the cat house with the upper respiratory infections, with the hair loss, with the mange dogs going in and out.
Q. Okay. As to 1767, that cat was unsociable; correct? That dog was unsociable?
A. The dog was unsocial.
Q. But most of these dogs were sociable; correct?
A. Most of them were easily handled, yes, sir.
Q. Dogs can sometimes be unsociable?
A. Yes.
Q. For whatever reason?

A. Uh-huh (affirmative).
Q. Even if the conditions are sociable, a dog may not be social. Just like in a group of humans, you might have a friendly group of people and one person that for whatever reason chooses not to be very sociable; correct?
A. Correct.
Q. 2316? This one had mites?
A. 2316 had the noninfectious mange.
Q. Noninfectious mange?
A. Yeah, caused by the Demodex mite.
Q. Are all dogs born with mites?
A. Everybody, even we have mites, Demodex mites, that live in our eyelashes.
Q. Really?
A. It is typically not a problem. There is a genetic predisposition to having an allergic reaction to the mites. You can have a litter of five puppies. All of them are good except one. It'll break with it.
Q. Is this called the puppy mange? Is that a vernacular for it?
A. Puppy mange, red mange, the mange, yeah.
Q. The mange?
A. It's got a number of common names.
Q. Is there another name apart from the Anglo-Saxon?
A. What do you mean Anglo-Saxon?

Q. I thought all the -- I was just speculating about all the old diseases what the single names were, the Anglo-Saxon names were. The scrop, the mange, the itch.
A. The laity, they call it -- anything with hair loss and scabs is called -- oh, he's got the mange, whether it's ringworm, cancer, allergies, legitimate mange mites. Medically, mange refers to hair loss caused by either Sarcoptic mange or Demodex mange -- mite.
Q. 2362 is dog that you said was in an unsanitary area?
A. Yes, sir.
Q. This dog, you also said, was healthy. And you put in your charts that it appeared normal?
A. Yes, it can appear normal and still live in a substandard environment. That was the environment from which he was removed.
Q. 2428?
A. Yes, sir.
Q. What was the situation with this dog? You said it didn't have -- I don't think you said it had necessary sustenance and shelter?
A. It appeared to have had necessary sustenance and shelter.
Q. That was 2428?
A. 2428, yes, sir. Terrier and Beagle mix, female adult.

Q. I may not have put that one on there. And 2562 was a Shih Tzu. You called it a Shih Tzu; right?
A. Shih Tzu, uh-huh (affirmative).
Q. Shih Tzu. And this is a dog that had hair loss; correct?
A. Yes, sir. This had end-stage hair-loss skin irritation.
Q. You also said this dog was healthy; correct?
A. No.
Q. My notes say you said the dog was healthy. He had hair loss.
A. He had hair loss. He wasn't healthy.
Q. What was the cause of that hair loss?
A. I didn't do a skin biopsy, so I cannot say for one hundred percent. The most common ones, given his breed, is something called atopy, which is basically allergic to who knows what. Food allergies. To complicate the issue, he had deep skin infection and a yeast overgrowth too. So it's a chicken or an egg. What caused it? The yeast infection, skin infection, hair loss. I'm seeing the end of the train wreck.
Q. Okay. You don't know when that train wreck started, do you?
A. There's no way to tell.
Q. So if she took in a dog which was unhealthy, then

that train wreck was already going on. If the unhealthiness occurred while the dog was in her care, then it occurred then. But you don't know either way, do you?

A. I don't. But if I've got one person taking care of sixty animals a day, there's probably not going to be bi-weekly baths.

Q. But you're inferring this. You don't know the history of this particular dog?

A. I'm inferring it by the condition of the dog when I received it.

Q. But you don't know anything about the history of this dog, do you? Nothing?

A. There's no way I could.

Q. Okay. I'll take that to be a no.

A. No.

Q. 2428, did you say that dog had the necessary sustenance -- I'm sorry. We just talked about that one.

A. I'm on 2634, is my next one up.

Q. 2562?

A. We just discussed him. That's the Shih Tzu.

Q. I beg your pardon. You're right. There's a lot of dogs here.

2744? You said this dog was pregnant; correct?

A. Yes, she was.

Q. You said the dog had necessary sustenance but where she was sheltered was not -- I forget what you said. Not ---

A. It was not appropriate.

Q. --- appropriate for a pregnant dog. In what way was it not appropriate for a pregnant dog?

A. She was housed in that area. We saw the picture of the porch with the little dog laying on it with the feces to one side. We had male dogs, we had bigger dogs, we had little ones, all of them running around. There was nowhere for this dog to have gone to be protected and safe to have her puppies.

Q. And you're looking at pictures; correct?

A. Correct.

Q. And you don't know -- there were police officers in there, correct, opening the gates and cages, from what you know?

A. From what I know.

Q. And you don't know if the pictures reflect how the dogs normally lived, do you?

A. (No verbal response).

Q. I mean, you're inferring from the snapshot that that's the way things are. Okay?

A. Well, yes.

Q. This is a snapshot. It's not a video of where the

dogs lived. It doesn't show where the dogs were last week. Just like this morning I was in Greenville. And here I'm in Anderson. If you took a picture of me here today ---

MR. MCLAIN: Your Honor, I don't understand where he's going with this line ---

THE COURT: Overruled. Ask your question.

Q. --- it might say -- you might infer well, he's in Anderson. But that's not necessarily true. I may be in Anderson today and Greenville this morning and Greenville again tonight; correct?

A. Yeah.

Q. 2785, you said that there was necessary sustenance and shelter for that dog?

A. Correct.

Q. I forgot to put that on the list.

A. This is one that had the Demodex mange.

Q. It had the mange?

A. Yes.

Q. Demotex (phonic)?

A. Demodex.

Q. And what is that, ma'am?

A. The Demodex mite causes Demodex mange.

Q. This is a puppy; right?

A. Dog 2785 I have as a liver and white Pomeranian mix,

male adult.
Q. This is more puppy mange; right?
A. Not if he's an adult.
Q. He's an adult?
A. That's what the intake sheet indicates.
Q. But you don't know if this is contagious or not, do you?
A. I do now. It's not contagious.
Q. It's not contagious.
As to 2840, this is a Beagle; correct?
A. Correct. This was the nursing mother.
Q. And you said this dog had the necessary sustenance, but housing conditions were substandard. In what way were they substandard?
A. She and her puppies were housed with an unrelated thin male dog.
Q. And there's a chance with that dog, being thin, might try to hoard the food; correct?
A. Correct.
Q. But you don't know if that dog hoarded food, do you?
A. No, I don't know that.
Q. There's no regulations in the state as to how you're to house a dog with puppies?
A. No, there aren't.
Q. 2952 is a Pomeranian. This dog was nursing?

A. Yes, sir.
Q. And your concern in this area was puppies shouldn't be housed with male dogs?
A. Correct. Unrelated male dogs.
Q. Unrelated male dogs, because those male dogs could turn out to be aggressive?
A. Frequently related male dogs are aggressive to puppies, yes.
Q. But what if the person in care of those dogs knew those dogs and knew they weren't aggressive? I mean, wouldn't they get to know if the dogs are aggressive or not aggressive?
A. It's possible. Does this person know whether that hair loss was contagious or not?
Q. 3007, you stated the housing conditions were substandard. That's another situation where there's a nursing dog; correct?
A. This is the same litter of puppies.
Q. Same litter of puppies. I beg your pardon. And then 3060, this is a situation where there was plenty of sustenance, you said, but it was an area that was substandard. In what way was it substandard?
A. This is the area where the dogs were up on the porch running around in that first fenced-in area.
Q. You don't know if they lived there normally, do you?

A. No, I don't know that they lived there normally.
Q. And the report here says, "This dog appears normal." This is what the receiving log says; is that correct?
A. Uh-huh (affirmative).
Q. All right. I beg your pardon for asking ask these questions. I'm trying not to necessarily go through all of these. But it's a lot, so I'm going to plow through this. Okay?

3105, you would have had that same concern about this one based on nursing; correct?
A. Yes, sir.
Q. And 3144, 3204, 3746 -- 32?
A. That's 3246, yes, sir.
Q. 3246, you would have had concerns based on nursing; correct?
A. Yeah. And at the point in time in which I looked at the pictures, there was an unrelated male dog in with the nursing mom and puppies.
Q. And as to 3319, the -- this is a Dachshund with hair loss; correct?
A. Correct.
Q. Now, Dachshund's have -- I think you said sixty percent have hair loss?
A. Sixty percent of this dog's body was involved in hair loss, scabbing, oozing, and itching and pain.

Q. Okay. This was just like the other, the brothers and sisters, the Dachshunds -- all of the Dachshunds who came in had mange; correct?
A. There were two that appeared to be litter mates that had this degree of mange.
Q. So if she received two or three dogs and they all had mange and they were litter mates, they might have easily had it as puppies; correct?
A. Uh-huh (affirmative).
Q. And the fact that the litter mates all had the same mange indicates that most likely when she received these dogs, they had mange. I mean, that would make sense, wouldn't it?
A. Yes, but it would not tell you which mange they had since the other is highly contagious.
Q. 3435, I think you said -- I'm sorry. That's on the list. I beg your pardon.
A. No. 3435 seemed to be the litter mate of the one we just discussed, 3319. They seemed to have shared a common background.
Q. 3435 had some hair loss; correct?
A. Over at least sixty percent of its body, yes, sir.
Q. And then 3488 was normal?
A. I've got a 3483 that was normal, yes. I don't have a 3488.

Q. It may be listed on there as 3488. It may be a 3, but I can't tell. It's a P.I.T.X. I don't know what that is.

A. A Pit cross,

Q. A Pit cross?

A. Pit Bull cross, uh-huh (affirmative).

Q. Yeah, that is a 3. I'm sorry. That dog there appeared normal; correct?

A. Yes, sir.

Q. And had necessary sustenance and shelter?

A. Seemed to, yes, sir.

Q. That's my poor reading skills.

3619?

A. Yes, sir.

Q. Was a boxer cross -- a boxer mix; right?

A. Yes, sir.

Q. And this dog had some worms?

A. Had hookworms, yes, sir.

Q. Wormy. Does age affect how often a dog gets -- why dogs get worms?

A. No. Their environment determines when they get worms.

Q. 3869 doesn't appear to be on the list. I think you said that that one had adequate sustenance and shelter with concerns?

A. I did. It was the one that was in the area with all the other little dogs that could get up on that porch with the feces on the blanket and the dogs with hair loss.

Q. That's all assuming that dog lived in that particular location; correct?

A. All I know from looking at the pictures, at that point in time, all those dogs were in that place together.

Q. Okay.

A. That place was not a suitable place for anybody at any time.

Q. 4275, this was a thin dog; correct?

A. Yes, sir. This is a Doberman Pinscher.

Q. If I told you that this dog came to her five days earlier with parvo, would that surprise you based on the appearance of this dog?

A. (No verbal response)

Q. 4275?

A. Yes, it would.

Q. Why is that?

A. Because -- and I'm making an assumption -- you would not leave a dog who had recently had parvo free to roam around in a large yard.

Q. Even if the dog no longer had parvo? How can you

tell if a dog had parvo and then no longer has parvo?
A. There's a bedside test that will tell whether or not that dog is shedding parvo virus in its stool.
Q. 4306, we did not put on the list?
A. This is the one that had heart worms.
Q. It had necessary sustenance and shelter? I didn't put it on the list, though, because there was an issue of heart worms maybe from mosquitos.
A. There has to be a mosquito involved in order to get heart worms.
Q. And you said the brother to 41 -- sorry -- that 4650 and 1767 are litter mates; is that correct?
A. I have no way of knowing if they're litter mates.
Q. 4306 -- I'm sorry. 4334, we did not put on our list. And you said that dog had necessary sustenance. This is a pregnant dog; correct?
A. Correct.
Q. Female obviously. But you said the housing was inappropriate for a pregnant dog?
A. Yes. This is the one that at some point in time, at the time in which the pictures were taken, was running around in an area with other dogs exposed to feces, exposed to dogs with hair loss.
Q. 4336 -- 4366 ...
A. Uh-huh (affirmative).

Q. Had some kind of injury; correct?
A. This is the one that the -- they put him down as injured because he had such deep craters and pits and eating away of the flesh, it looked like an injury. After I sedated him and clipped him down, it was obvious that this was the -- this was the work of long-standing bacterial infection.
Q. How long?
A. Oh, at least two weeks or more.
Q. How long have you been at PAWS for?
A. Since August of '09.
Q. August of '09? So that's six years approximately?
A. Yes, sir.
Q. And a couple months. And PAWS takes in dogs that have illnesses and sickness; correct?
A. Yes, sir. We're an open admission county facility. We cannot turn any animal away if it's presented by a resident of Anderson County.
Q. So the dogs come in, and you have -- you treat them?
A. (No verbal response)
Q. And some you treat and some you put down, and you have different ways of determining which one you want to do; correct?
A. Right. The decision is not solely mine. I just inform the decision makers.

Q. I understand that. And that mere presence of a sick or injured animal in your facility does not necessarily mean that you have failed to care for this animal; correct?

A. No. But there is a difference between our facility and this facility.

Q. Okay. I'm not asking for comments. I'm just asking for a direct answer to my question. The mere presence of a sick or injured animal in your facility does not necessarily infer that animal has not been properly cared for by you?

A. It does not imply that, no, sir.

Q. Okay.

MR. TONEY: That's all the questions I have for this witness.

THE COURT: Any redirect?

MR. MCLAIN: Yes, Your Honor.

REDIRECT EXAMINATION

BY MR. MCLAIN:

Q. Dr. Powell, do you normally rely on the legislators in Columbia to tell you how to care for animals, or do you rely on your veterinary training?

A. I rely on my veterinary training, and I rely on the standard of care as determined by the South Carolina Board of Veterinary Medical Examiners.

Q. And are the dogs you examined that came from Ms. Sheridan's property and the pictures you reviewed of the actual property and the areas, regardless of whether or not where those dogs lay their heads at night, is it sanitary or safe for those dogs to be anywhere on that property?

A. No, sir.

MR. MCLAIN: That's all the questions I have, Your Honor.

MR. TONEY: I have might have one redirect, Judge.

RECROSS-EXAMINATION

BY MR. TONEY:

Q. Since you rely on your standards of veterinary training and the South Carolina Board of Veterinary Medicine, those standards have not been promulgated as general regulations in Anderson County regarding the care of animals; correct?

A. Not to my knowledge.

Q. All right.

MR. TONEY: That's all the questions I have.

THE COURT: All right. Anything further from this witness?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Any objection to this witness being

excused?

MR. TONEY: None, your Honor.

MR. MCLAIN: No, sir.

THE COURT: Thank you, Doctor. You are excused.

THE WITNESS: Thank you.

THE COURT: Mr. Toney, you need to get your notes up here. You've left them amongst all the exhibits.

MR. TONEY: Oh, I'm sorry. I thought they were the State's.

THE COURT: All right. Mr. McLain?

MR. MCLAIN: Your Honor, at this time the State rests.

THE COURT: Thank you.

MR. TONEY: Judge, I'll have a motion.

THE COURT: Okay.

All right. Mr. Bailiff, would you take the jury to the jury room, please, sir?

(WHEREUPON, the jury exited the open court at approximately 4:49 p.m.)

THE COURT: Yes, sir?

MR. TONEY: Your Honor, I move for a directed verdict. This motion is based on the following grounds. The State is alleging that Ms. Sheridan's care of these

animals didn't meet certain minimum standards. They also have testified at great length many times that there are no real regulations, rules, manuals, anything in place defining what these standards are. Without some kind of standards, there's no notice to my client as to what law she's violating.

This is not just a negligence case where the plaintiff has to bring in an expert to testify about the standard of care. This is a case that involves liberty, and obviously due process is attached. There's insufficient notice as to what the particular standard of care is that my client was supposed to use in caring for these dogs and cats. Based on that ground, I move for a directed verdict.

I have a few other grounds too as to ---

THE COURT: Let me go ahead and hear those.

MR. TONEY: Okay. There are certain animals of which the vet testified in a list, Defendant's Exhibit 3. These animals all had necessary sustenance and shelter, according to the State's own witness. They also had no other concerns. There were dogs and cats that she said had necessary sustenance and shelter, but she had other issues. These particular animals she had no other concerns about. I'm not quite sure how to correlate it with the warrants unless we go through each one. I think

that could take quite a while. But on those particular dogs and cats, I also move for a directed verdict.

THE COURT: Okay.

MR. TONEY: Additionally -- if I could have just a minute. All the vet's assumptions were based upon -- any of her assumptions as to the standard of care based upon snapshots -- she didn't know where those dogs and cats were located normally. She looked at them based on these pictures which didn't necessarily -- the dogs were free to roam. The dogs could have moved. The cats could have moved -- based on the assumption they all remained in place. I think that's a huge assumption. There was some testimony the dogs had moved around. Dogs followed certain of the animal control folks. And based upon that, I don't think you can make that assumption.

And generally, I don't think the State has proven its case.

THE COURT: Thank you, Mr. Toney.

Mr. McLain?

MR. MCLAIN: Your Honor, I would point out that the veterinarian did just say that in her medical opinion, there's nowhere on that property that's sanitary or safe for any animal to be on. I think if you look at that in and of itself, that's enough. And in a directed verdict motion, you look at the State's evidence in the

light most favorable to them. If you look at that in and of itself, that's enough if the jury believes that from an expert, and that's enough to convict just on that.

And regarding -- I don't -- I'm not quite sure I understand Mr. Toney's argument on the lack of regulation as far as the standard of care goes. I had a vet testify to what is safe for animals to be in and what's not. And based on her opinion, you know, the dogs were living in an unsanitary condition.

MR. TONEY: If I could ---

THE COURT: Are you finished, Mr. McLain?

MR. MCLAIN: Yes, sir. Yes, sir.

THE COURT: All right. Mr. Toney, what were you wanting to say, Mr. Toney?

MR. TONEY: I was just going to comment on something Mr. McLain has stated when he said he wasn't sure what I meant. This is not like a malpractice case, like a legal or medical malpractice, or even a veterinarian malpractice case where you have an expert who must come and testify on the standard of care. This is a case, a criminal case. And surely the notice required in a criminal case is higher than in a civil matter. In a civil matter, you would have to have some sort of testimony about what the proper standards are, what the proper care is.

In this case, the proper way to give this is the State should have policies and procedures and manuals. Something should have been introduced saying this is the way you do this, this is the way you do that. And none of that was brought in.

THE COURT: All right. Mr. McLain, my question to you, you have brought the -- and I'm operating under indictment 2015-GS-04-01177. And this is the ill treatment of animals indictment. And you have sixty counts included in that indictment. The testimony that I've heard involves you bringing your case based on part of the statute which is depriving an animal of necessary sustenance or shelter. And I think you asked the doctor the question pertaining to that part of the statute for every one of these dogs.

MR. MCLAIN: That's correct.

THE COURT: Okay. What is your argument that when she testified in response to that question on these dogs that are on the list here, that they received in her -- your expert's opinion, proper sustenance and shelter, how does the charge survive a directed verdict motion when your expert said that they did receive sustenance and shelter?

MR. MCLAIN: She said it appeared to her that they did, but she also said that those dogs' access to

any of the areas is unsanitary. And I think that goes along with the shelter. If the dogs were allowed to roam, that whole back yard is their shelter. And if it's unsanitary, that's not, I think, the necessary shelter required by law.

THE COURT: Okay.

All right. This is what -- I've heard the testimony. And Mr. Toney, I'm going to deny your motion on directed verdict regarding the statute. The Legislature has put the statute in place.

MR. TONEY: Yes, sir.

THE COURT: There are a number of statutes which do not have detailed regulations governing how they're to be applied. The State has presented sufficient evidence for the case to be a jury question on those grounds. However, I am going to direct a verdict on the specific counts of the animals included on the list that the State's expert said were receiving sufficient ---

MR. TONEY: Yes, sir.

THE COURT: --- sustenance and shelter. So what I would -- Mr. McLain, what I would like you to do when you do your argument at the end and also when we prepare the jury verdict form, we're going to have to modify it because several of the counts will be removed

from the indictment. But you've done a good job on the indictment, and both attorneys have done this in questioning of referencing specific numbers of the dogs. And with this volume of material, I know I've struggled to keep up with what dog you're talking about. So we're going to have to make sure those specific animals are not in dispute.

MR. MCLAIN: Yes, sir.

MR. TONEY: Thank you, Your Honor.

THE COURT: All right. While we have the jury out, Mr. Clerk, would you put the defendant under oath?

THE CLERK: Sure.

(WHEREUPON, the defendant was duly sworn.)

THE COURT: All right. Mr. Toney, you and your client stand up.

MR. TONEY: Yes, sir.

THE COURT: Okay. Ms. Sheridan, at this time, I'm going to explain to you some of your rights. If you do not understand anything that I say, please let me know, and I will explain it in more detail.

THE DEFENDANT: Yes, sir.

THE COURT: If you answer the question, I will assume that you understood the question. Do you understand?

THE DEFENDANT: Yes, sir.

the case or do any independent research or consult with any media sources or other folks about the facts or the law?

(Unanimous negative responses by the jurors)

THE COURT: Let the record reflect there are no positive responses.

Is the Defense ready to proceed?

MR. TONEY: Yes, we're ready, Your Honor.

THE COURT: Okay, Mr. Toney.

All right. Mr. Toney?

MR. TONEY: Yes, sir.

THE COURT: Call your next witness. Call your witness.

MR. TONEY: I'm sorry. I didn't know -- I didn't know you were waiting. I beg your pardon. I call Debra Sheridan.

DEBRA LYNNE SHERIDAN,

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. TONEY:

Q. Debra, where do you live?

A. At 818 Hamlin Road in Easley, South Carolina.

Q. And where were you born?

A. Here -- Pickens County.

Q. In Anderson?

A. I was born in Pickens County.
Q. Pickens County?
A. Uh-huh (affirmative).
Q. And your folks, what are their names?
A. Brenda and Jimmy Sheridan. My mother passed away in April. Both born in Pickens.
Q. Do you have any brothers and sisters?
A. No.
Q. And are you married?
A. No.
Q. Do you have any children?
A. No.
Q. And how long -- tell me a bit about your background.
A. I lived here until I graduated high school, and then I moved to Raleigh, North Carolina. I stayed up there for about twenty-five years and worked as a photographer, a children's photographer, for a few years. And then I worked as a graduate gemologist. I went back to college.
Q. A gemologist?
A. Uh-huh (affirmative).
Q. What's a gemologist?
A. Gemologist -- I do appraising and grading of gemstones like diamonds and sapphires, rubies.
Q. And how did you get into the dog rescue? Explain that.

A. My dad got sick in 2000, 2002, something like that. He had stage IV lung cancer, and I came back here to help Mom take care of Dad. And I went to a -- we've got five acres out in the country. And I went to adopt a dog from Anderson County. And while I was there, there was a -- like fliers on the desk there that said -- congratulating them on only euthanizing, I think the sum was, fourteen thousand, five hundred and something dogs that previous year. I couldn't believe it. And I just couldn't get past that.

Q. So what did you do then?

A. I went back to work as a jeweler for a few weeks and started looking into animal rescues, trying to think about trying to open up one. And there's no -- nothing anywhere. Nobody will even talk to you about how to open up an animal rescue. Nobody wants to -- it's like it's some big secret or something. So ...

Q. Is there any manuals or books or anything on this kind of thing?

A. Not in South Carolina, there's not.

Q. And have you discussed this with anyone? Have you tried to?

A. Absolutely, yeah. I'm a by-the-book kind of person if there's a book to go by. I thought there should be guidelines, rules, regulations that would govern not only

the shelters, but the shelters and rescues, anybody that wants to start a rescue, because there's so many animals in South Carolina that are homeless, there's enough to do rescues. I mean, you could have a rescue on every street corner and have them filed up the way it goes right now.

Q. And you believe in helping these dogs and saving them from being euthanized?

A. Absolutely. I believe that if they're born, they should be able to live out a natural life.

Q. Okay. And if a dog is sick or a dog has health problems, different places or different facilities have different philosophies on this; correct?

A. Yes, they do. They do. Some euthanize.

Q. What kinds of ranges of philosophies have you seen?

A. Anywhere from sending them to a shelter or sending them to another rescue from a shelter to euthanizing just on -- as an intake.

Q. Do you euthanize dogs?

A. No. The only time I would ever put one down would be if they were suffering.

Q. So even if they have a health problem, you're trying to help them?

A. Absolutely.

Q. Do you take dogs that are sick?

A. Yes. I take mostly dogs that are sick.

Q. And you've been doing this for how many years?
A. I started the rescue in 2004, start -- it began, and then I got my 501(c)(3) in 2006.
Q. And about how many dogs have you placed or adopted out?
A. Successfully, that have stayed in their homes over five thousand.
Q. And how do you know it was over five thousand?
A. Because I keep up with it. I keep up with it.
Q. Do you know all their -- do you know their names and everything else?
A. Yes.
Q. And how do you find homes for these people -- these dogs, I mean?
A. Internet usually. Word of mouth has been phenomenal. I've adopted to a lot of higher end, like Bill Geist up in New York and places like that. And then they tell somebody, and then we end up adopting to their son and their daughter. And you know, it goes on and on. I've got dogs in forty-three states, Canada and Germany.
Q. Have you ever gone and checked out the homes where they're going to be?
A. Always. Every home. Every home.
Q. What if they're in different states? Have you gone to the houses?

A. We deliver the dogs ourselves. They don't ever leave our sight until they go to their home.

Q. Okay. What if they -- how far have you gone to deliver a dog?

A. Canada.

Q. You've gone to Canada?

A. Yes. Twice -- three times.

Q. To check out the home ---

A. Uh-huh (affirmative).

Q. --- where you're going to place the dog?

A. Absolutely.

Q. So it's fair to say you're a true believer; correct?

A. I am a true believer. There's a home for every dog. You've just got to find it.

Q. Is it fair to say this is your life ---

A. It is my life ---

Q. --- to take care of these animals?

A. It is my life now, yes.

Q. And you don't have any children; right?

A. No, no children.

Q. Why is that?

A. I never married. I've always been too busy working and ...

Q. How do you feel about these dogs and cats?

A. They're my babies. They're really my babies.

Q. And you've placed dogs with well-known famous people?

A. Yeah, quite a few.

Q. Like who?

A. There's a couple of judges that -- there's one of our dogs that wanders the halls of the White House every day.

Q. Really?

A. Yeah. Bill Geist, he was the CBS Sunday Morning -- one of the reporters on that show, and he's got Daphne. In fact, he did a public service announcement when he announced he had -- what has he got? Not lupus. It's -- I can't remember now. He has her.

Q. Alzheimer's?

A. No, he's got -- it's another one. It's -- I can't remember what it is. But she's in his video.

We've got one in -- one that I took of the euth. table in Anderson County. I walked in one day, and there was a little dog standing there. He just look at me funny. And they were getting ready to put him down. They already had him -- he was next in line. I asked if I could have him, and I took him. And he's now a headliner at the Comedy Barn in Gatlinburg, Tennessee. He does five shows a week.

Q. Do you love these dogs?

A. I love them all, yes.
Q. Now, tell me a little bit about your history with -- I mean, the -- I'm going to go into this Exhibit 3, the ones with necessary sustenance and shelter. These charges have now been dismissed; correct? They won't be considered by the jury?
A. Yes, sir.
Q. So we're dealing with some remaining dogs; correct?
A. Okay. Yes.
Q. I'm going to go through -- this is the vet's records from PAWS.
A. Okay.
Q. The vet did some and PAWS did the other? I guess it's put together by the veterinarian staff at the Anderson County PAWS facility; correct?
A. Yes.
Q. Of the dogs that are not on this list, Exhibit 3 ---
MR. TONEY: I'm going to hand this to the jury so the jury can see it.
Q. --- there are some dogs on that chart, on that list, where it says "appears normal." Correct?
A. Correct.
Q. And the first one would be 1201; is that correct?
A. Yes, uh-huh (affirmative). That was a domestic short-haired kitty cat. Blue and white. It's a male.

Q. It's a male?
A. Uh-huh (affirmative).
Q. And the report came back that this dog was normal; correct?
A. It is a cat, yes.
Q. A cat. I'm sorry?
A. Yes. Appears to be normal.
Q. And if you go into the actual body of the report, which is the first set of three pages -- and there's a lot of pages there. I know you know these dogs. But if I go too fast, slow me down. Okay?
A. Okay. I will.
Q. What does it say on date source 3/21/2015 animal condition, the first bit right here?
A. Appears normal.
Q. And then it was examined later a second time?
A. Uh-huh (affirmative). Right.
Q. And what does it say?
A. It says "appears normal."
Q. Okay. And then when it was seized in custody, what was the condition?
A. Appears normal.
Q. And then when it was seized again, what was the condition?
A. Appears normal.

Q. Okay. So Anderson County has stated that this particular dog ---

A. Cat.

Q. --- or cat -- I'm sorry -- appears normal?

A. Uh-huh (affirmative). Yes, sir.

Q. All right.

A. That's Tom Tom.

Q. And now I'm going to go into the next one, which is 1384, which also appears normal. And you may have to flip through this a little bit. I don't have -- it's right after 1310.

A. That's another kitty cat.

Q. Do you know what this animal here is listed by Anderson County as what?

A. As an adult domestic short-hair black and white.

Q. Do you remember this cat?

A. Oh, yes, absolutely.

Q. And what can you tell me about this cat?

A. This is Oreo. She's an adult cat. She just kind of showed up there, so I think someone probably put her out there.

Q. Really?

A. Uh-huh (affirmative).

Q. And it says "appeared ..." On the first exam on 3/21/2015 at two fifty-three?

A. Appears normal.
Q. Appears normal? And then later on that afternoon, a second exam?
A. Appears normal.
Q. Appears normal? And then on 3/18, there was another exam. And how did that ---
A. Appears normal.
Q. Appears normal? And then on 3/18/2015, how was that?
A. Appears normal.
Q. So Anderson County did their own records?
A. Uh-huh (affirmative).
Q. And on four separate occasions, they have certified this animal was normal?
A. Yes.
Q. Would you say this animal appeared normal?
A. Yes. She had a real bad respiratory infection when she got to me, and she'd had that -- I gave her ten days of Doxycycline, and she cleared up.
Q. Doxycycline?
A. Yes.
Q. What is that?
A. It's an antibiotic.
Q. Antibiotic?
A. Uh-huh (affirmative). It's great for the upper

respiratory infection. It works good.
Q. Okay. Did she have food and water and all of that?
A. Oh, yeah. They all did.
Q. Okay. The next one on this list is 1450. This is the next one of the charges that have not yet been dismissed that's listed as appearing normal. So I want to ask you to refer to 1450.
A. Okay. This is a domestic short-hair black and orange calico.
Q. Okay. Do you know that cat?
A. Her name's Cali.
Q. Cali?
A. Uh-huh (affirmative).
Q. Named after what, the calico?
A. The calico, yeah.
Q. Yeah.
A. You run out of names after a while.
Q. Very imaginative?
A. Yeah. And you run out of names after a while.
Q. And on 3/21, they did an exam ---
A. Appears normal.
Q. --- at PAWS?
A. At PAWS, yeah.
Q. And then it looks like they did a separate exam at PAWS?

A. Uh-huh (affirmative).
Q. And how was that cat then?
A. Appears normal.
Q. Appeared normal?
A. Uh-huh (affirmative).
Q. So they did two separate exams, and each time they found this cat was normal?
A. Exactly. Yes, sir.
Q. So they did a third exam -- this was on 3/18/2015 -- and what did they say about the cat?
A. Appears normal.
Q. Appears normal?
A. Uh-huh (affirmative).
Q. So on 3/18/2015 at another time -- the first exam, I guess this was, was at ten thirty-nine -- what did they say about the cat?
A. Appears normal.
Q. All right.
A. They also -- can I mention ---
Q. Yeah.
A. They've also got here that they seized the kitty on 3/18 at 5:37 p.m. But the exam was done at ten thirty-nine a.m.
Q. Well ...
A. I'm not sure. I was just curious about that.

Q. I don't understand. Maybe the procedure is different from the time they do the initial exam.
A. Okay.
Q. I'm not sure.
Now, the next one is 2035. I don't know where that one is. I'm sorry. Maybe 2038.
A. 2038?
Q. And this was a domestic medium-hair, mixed white medium cat.
A. Uh-huh (affirmative). Male.
Q. What?
A. He's a male.
Q. Male?
A. Uh-huh (affirmative).
Q. I'm sorry. And do you remember this cat?
A. Absolutely.
Q. What can you tell me about this cat?
A. He is the brother to the female white cat that they have also. He's a little rambunctious and a little on the wild side. I call him Mojo.
Q. Mojo?
A. Mojo.
Q. And you named him Mojo because ---
A. He's got moxie.
Q. He's got mojo?

A. He's got mojo.
Q. All right. And they did at PAWS, the vet and the staff, did four separate investigations ---
A. Uh-huh (affirmative).
Q. --- or exams of this cat; correct?
A. Yes.
Q. The first one was on 3/18/2015 at 10:39 a.m. And what did that exam yield?
A. Appears normal.
Q. And then they did another exam when they seized custody 3/18/2015. And what does it say there in these reports?
A. Appears normal.
Q. And then on 3/19/2015, they did another exam. What did they say in this separate exam?
A. Appears normal.
Q. And on 3/21/2015, what did they say about this cat?
A. Appears normal.
Q. Was the cat in good normal health?
A. Yes, he was.
Q. Okay.
A. He's a mighty hunter.
Q. All right. Now, I'm going to go to the next one which is 2362. I'm not sure where that one is. Let me get to it.

A. That is a white Malti-poo.
Q. Okay. This particular one is a Terrier Beagle, white small female.
A. Okay.
Q. And this is 2362.
A. 2362?
Q. It's three or four past what I just gave you.
A. Okay. I'm sorry. It's taking me a minute to look through.
Q. That's all right. They're listed on the front because they're all in sequence.
A. They are?
Q. Look on the front ---
A. Okay.
Q. --- and then you can just figure out where you're at. 2362.
A. Okay.
Q. I'm sorry. I'm sorry. Yeah, 2362.
A. Okay.
Q. Here it is on the second page.
A. I skipped it.
Q. Let me hand it to you on this one.
A. Yeah, please.
Q. Tell me about 2362.
A. Appears normal.

Q. Okay. The first exam, what time was it and what date?
A. Eleven sixteen a.m. -- or eleven eighteen a.m. on 3/18.
Q. And what did they say?
A. Appears normal.
Q. So after that, they did a second exam. When was that?
A. 3/18 at four fifty-nine.
Q. And what did they do with when they did their second exam? How was that animal?
A. Appears normal.
Q. And then they did a separate one, and what was that?
A. 3/21/2015 at two forty. Appears normal.
Q. And after that, did they do another exam?
A. No. That's the only three.
Q. So they only did the three separate exams at this time?
A. Yes.
Q. And in these three separate exams, what did they say about the dog?
A. He appears normal.
Q. And well, did the dog have normal, good health?
A. He does, but he does have seizures.
Q. He does have seizures?

A. I informed them of that before they took me away.
Q. So they didn't put that in their report?
A. No, they didn't put that in the report.
Q. What causes the seizures?
A. A lot of times overexcitement. Well, he actually had one when they were taking him away. I saw it on video.
Q. That's a genetic thing?
A. Yes.
Q. Okay. And by the way, where do you work right now?
A. I work at Dr. Bob Moorhead's office in Pendleton.
Q. What are you? A veterinarian's assistant?
A. I help Dr. Moorhead when he needs help as a veterinary assistant, yes.
Q. Okay. And you deal with dogs and health issues?
A. Uh-huh (affirmative). Yes.
Q. All day long?
A. All day long.
Q. Right now, what are your working hours there?
A. I usually try to work three days a week. I go in about eight thirty until he needs me.
Q. Okay. All right. The next one is 2428. See if you can find it. It's the very next one on the list.
A. Okay. 2428.
Q. I'm going to hand it to you.

A. Okay. I'm sorry.
Q. Now, this one here there are only two exams, one by the vet and then the vet's staff?
A. Okay.
Q. Tell me when that happened.
A. Let's see. They were 3/18 at 9:56 a.m. and 3/18 at 4:59 p.m.
Q. And what did each one of those exams yield?
A. Both of those say "appear normal."
Q. What kind of dog is this?
A. It's a little female Terrier.
Q. What's her name?
A. Her name's Roxie.
Q. Roxie? And how did you come to get Roxie?
A. She was brought to me by a lady that someone had moved away and abandoned her and her puppy.
Q. Okay. And when did you get Roxie?
A. I've had Roxie about four months probably.
Q. And what kind of dog is she?
A. She's just a little Terrier. She's a little wire-haired bouncy little Terrier.
Q. By the way, I saw the -- just not to get too far off track. But I saw the videos of your dogs. And they seemed ---
MR. MCLAIN: Your Honor, I'm going to object.

He's testifying, for one thing.

MR. TONEY: He doesn't even know what I'm asking yet.

MR. MCLAIN: And he's leading.

THE COURT: Phrase it in a question, Mr. Toney.

Q. Did you see the video of the dogs when the -- and the pictures of the dogs -- when the -- the animal control people introduced?

A. Yes.

Q. And they were -- how did they seem to you? Were they aggressive, or did they seem calm?

A. They seemed calm.

Q. Really?

A. Uh-huh (affirmative).

Q. And there were so many of them that seemed like they were just calm and curious. Isn't that true?

A. That's true. Yeah, calm and curious little dogs.

Q. Okay. Is it more typical for dogs to be barking and aggressive?

A. Most of the time usually, yes.

Q. But your dogs seemed very calm; isn't that true?

A. They usually are. They get a lot of attention.

Q. Okay.

MR. MCLAIN: Your Honor, I'm going to ask that Mr. Toney stop leading his witness.

MR. TONEY: He has to make an objection to a specific question.

THE COURT: Okay. Don't lead the witness. Let's proceed.

MR. TONEY: Okay.

Q. The next dog is 2744. See if you can find it.

A. Okay.

Q. 2744.

A. 2744? 2678 is -- I'm skipping 2744 because it's not in this sequence -- I don't know. Mine goes from -- it just skips that one number, 2634 to 2785. It skipped 2744. I'm sorry. Yes, it not's in this sequence.

Q. Did you find it?

A. No. I skip from -- I go from 2678 to 2785, it must have been.

Q. Then go to 3060.

A. 3060? Okay. I have that one. Pomeranian mixed gray and white small.

Q. Pomeranian mixed gray, white, small?

A. Uh-huh (affirmative). Yes, sir.

Q. Hang on just a second. What kind of dog is that?

A. He's a Pom.

Q. What's the dog's name?

A. Ko-B, K.O. dash B.

Q. How did you get Ko-B?

A. Ko-B came to us from a friend that had my personal dog's brother.
Q. Okay. And why did you end up with Ko-B?
A. Because my dog -- he lived to be fourteen, but he had everything wrong with him under the sun. The vets wouldn't even see him around here. His brother is Ko-B's father, so I wanted something out of K.O.'s line. That's why his name is Ko-B. It's K.O. dash B.
Q. So you had a dog that had so many problems the vets wouldn't see him?
A. Yeah. I had to take him Athens, Georgia, just to get his shots done.
Q. And you went and got Ko-B because of what?
A. Because Ko-B is K.O.'s nephew, I guess it would be.
Q. Something to remember your other dog by when the other dog goes?
A. Yes. K.O. was a very good boy.
Q. Now, on 3/18/2015 at ten twenty-three a.m., the vet or the facility did an exam on this dog; correct?
A. Correct.
Q. And how did this dog appear?
A. Appears normal.
Q. And then at three fifty-nine p.m., they did a second exam on the same day; correct?
A. Yes.

Q. And how did this dog appear?
A. Appears normal.
Q. Now if you go down -- go down to 3060.
A. That's the one that we just did.
Q. I'm sorry. Go down to 3365. This is a miniature Schnauzer?
A. Yes. That's Licorice.
Q. Did you find it?
A. 3365, yes, I've got it right here.
Q. And on 3/18/2015, there was an exam of this dog?
A. Uh-huh (affirmative).
Q. And what did they say about this dog?
A. She appears normal.
Q. They did a second exam when they seized custody on three fifty-nine p.m.; is that correct?
A. Correct.
Q. What did they say when they seized custody of this dog?
A. Appears normal.
Q. And then on two forty p.m., had another exam; right?
A. Correct.
Q. What did they say at that time?
A. Appears normal.
Q. And tell me about this dog.
A. That's Licorice. She has been adopted once and went

home and stayed for about a year. And she's just wide open all the time. She's on the table. She's bouncing -- and she will bite if you scare her. If you sneak up behind her and startle her, she will bite. But she's just wide open. And the people that had her couldn't handle her, so I took -- my dogs -- it's in the contract at any time they can't -- no questions asked. If they can't handle them or they have to get rid of them, they always come back to me. So she came back to me for me to find her another home. I'm not sure I'll ever find her one.

Q. Did you find a home?

A. For me to be able to try to find her another home. Now, I don't know that she -- it's going to take something -- or take a lot of work to find her a home that they don't mind her being on the table and jumping up on the countertops.

Q. She jumps up on tables and countertops?

A. Yes. She tears up blinds. She has separation anxiety. When you leave her, she goes real crazy. She's mostly Schnauzer. She's a little wild.

Q. Is this dog adoptable by a regular facility?

A. No. No. She would be euthanized if she was left somewhere in a regular shelter.

Q. PAWS is a euthanizing facility. You've been to

PAWS; right?

A. Yes, I have.

Q. And they have a place -- you heard the officer testify that they have an incinerator where they euthanize them?

A. Yes.

Q. Okay. Now, the next one is 3619, the Boxer mix, tan and white tri-color large male.

A. Male?

Q. What can you tell me about this dog?

A. 3619, correct. 2619, that's a -- he came in along with several other dogs. These guys were living in Central, and their owner died. They were living in a very small place, a very small home. They had no room to run or anything. He kept them though. He kept them their entire life. They did fight a lot. They mentioned yesterday about a black Lab that had -- they thought was injuries and it turned out to be old wounds. They were all wounds from when this gentleman had them. He passed away about -- I guess it was November, December of last year. And I took them to keep them from going to a shelter because in a shelter those dogs would never be placed. They would never be placed in a home.

Q. Why is that?

A. They're older. They're anywhere from the ages two

to three to seven, eight, nine. They're large breed dogs, and they've been together as a pack their entire lives. These dogs -- they're great when they're separated. But you put them together, they're over the fence. They dig under. They take their teeth and put it in a chainlink fence and just tear a hole in it. But they're not bad dogs; they're just a little on the wild side.

Q. People who maybe want a dog for a kid, would they adopt a dog like this?

A. No, because he would probably never stay in the yard.

Q. Okay. All right. And in their report, this dog had three separate exams by PAWS; correct?

A. Correct.

Q. And what did they say in their report?

A. Appears normal.

Q. On each time?

A. Each time, yes.

Q. All right. Now, 36 -- I'm sorry. 3869 is the next one on the list of dogs that say "appears normal." This is 3869. I'm sorry.

A. 3869?

Q. Don't mind me. I'm just a little bit dyslexic.

A. Terrier. Okay.

Q. This is a Retriever, I think. Labrador mix black large? No. That's 3789. Hang on for a second. 3869. It's several after that.

A. Here we go. 3869 is a female Cairn mix.

Q. I'm sorry. So 3869, so what type of dog is this?

A. I've got this one as a female Terrier mix. She was also an abandoned dog. I've had her for about probably six months.

Q. And where did you get this dog from?

A. Someone brought her to me, just asking that I take her in. They didn't leave a name or anything because I don't require that. I don't -- as long as they bring them in and they're in good condition and I can at least ask a few questions, I'm happy about that. I'd rather that than have them tied to the fence like the majority of them are, taped into a cardboard box.

Q. Are all the dogs in good condition when they come there?

A. No, absolutely not. The one's that get left like chained to my fence or thrown over the fence or put in the dumpster or left in cardboard boxes with duct tape, taped up with duct tape, those are usually not in good condition.

Q. This dog here was in good condition?

A. She's in good condition, yes.

Q. And, indeed, they did two -- how many separate investigations or exams did they give this dog?
A. Three over the course of as many days, the 18th through the 21st?
Q. And each time how did the dog appear?
A. Appears normal.
Q. All right. And was that dog in good condition?
A. Yes.
Q. Now, 4306. I'm not sure where that is. I'm sure you can find it. It's a Welsh Corgi. Is that the way you pronounce it, Corgi?
A. Yes, uh-huh (affirmative).
Q. Cardigan mix?
A. Cardigan mix, yes.
Q. White, sort of tan and white tri-colored?
A. Yes.
Q. Medium ---
A. Correct. That's what they have him down as.
Q. --- dog ---
A. He is actually the brother to the two. There's two Bassadors. They came from up in Easley next to the hospital going up toward Dacusville. This lady had a -- she had a Basset Hound, female, and a male Labrador Retriever. And this resulted into eight puppies. She found homes for all eight of them except for these three.

And it was Petey, Batman and Spot. And this is Spot.
Q. This is Spot?
A. This is Spot.
Q. And how long have you had Spot?
A. They've been with me ---
Q. Spot, the dog?
A. They've been with me for -- they're about seven months old now, and I got them when they were about three months, so ...
Q. Four months?
A. Four months. And it took me two months to ever touch them.
Q. Why is that?
A. They're very shy dogs. They went to their owners, the original owners, and then it took me about three months to touch them. It was tough. But I'd just go out and sit down with them. They love me. They're very social now, but they weren't originally. They love other dogs; they're just not crazy about people.
Q. Are these -- the numbers of the dogs that we've gone through just now, are these the numbers of these dogs that appeared normal ---
A. Yes.
Q. --- are still remaining on this list?
A. Yes. Yes, sir.

MR. TONEY: I move to introduce this list as Defendant's Exhibit Number 4.

THE COURT: Any objection?

MR. MCLAIN: No, sir.

THE COURT: Defendant's Exhibit Number 4 would be admitted without objection.

(WHEREUPON, Defendant's Exhibit Number 4 was marked and admitted into evidence.)

Q. We're going to go through the last dogs on the list. Trying to carve this up so that we can have something that the jury can understand, ma'am.

The next one that I'd like to go through is 1921. This is the first problematic dog on the list. I use that word advisedly. Can you find that dog?

A. 0921?

Q. This dog is listed as ---

A. 0921. Border Collie mix.

Q. 0921? I'm sorry.

A. Yes, sir.

Q. Sorry. Yes.

A. Okay. They've got a Border Collie mix, black, white medium.

Q. Okay.

A. Can I get something in here just a moment?

Q. You can get whatever you need. No need to rush.

A. This dog had just arrived. His name is Bear. And he actually came from a girl that I work with. It was her sister's. They weren't able to care for him. They were moving. He was also a little rambunctious. That's the ones I usually end up with are the ones the owners don't want them put down. They know that if they take them to a shelter they're going to be euthanized. So they bring them to people like me that will take the time to get out there and find them a home.

Q. So you said Bear had just arrived?

A. Bear had just arrived, yes.

Q. What do you mean just arrived?

A. He had been there less than a week.

Q. Okay. Was he a little thin?

A. He could use a few pounds, yes. But he was a very active dog. He liked to run a lot. We'd just did his shots on him. I did his shots -- he came in on the 4th. I did his shots on the 14th.

Q. That reminds me. And I'm going to break into this before I forget it. Did all of these dogs have rabies certificates?

A. Yes.

Q. Are these the certificates you obtained ---

A. Yes.

Q. --- regarding all of these animals?

A. Correct.
Q. Please look at them.
A. Yes, these are all from the dogs.
Q. Are they all signed at different times?
A. Yes, uh-huh (affirmative).
Q. Different dates?
A. Yes, they are.
Q. What would be the normal procedure for shots?
A. Normally, I bring one in. It depends on where they came from and what kind of condition they're in. I'll hold them for a few days to see if they're going to be sick. If you give a sick dog a lot of modified virus shot, nine times out of ten you're either going to kill it or you're going to make it sicker. So I like to hold them for a few days and make sure that there's nothing going on with them that's going to be detrimental to their health, and then I give the shots. Dr. Bob does the rabies. He does the shots too sometimes. It just depends.
Q. And we filed these rabies certificates with the Court and gave a copy to the solicitor; is that correct?
A. Yes, sir.
Q. Like a day or two after these charges were brought?
A. Yes, sir.
Q. Or maybe the next day?

A. Yes, sir.

MR. TONEY: I move to introduce these collectively as Defendant's Exhibit Number 5. The solicitor has a copy.

THE COURT: Any objection?

MR. MCLAIN: No, sir.

THE COURT: All right. Defendant's Exhibit Number 5 would be admitted without objection.

(WHEREUPON, Defendant's Exhibit Number 5 was marked and admitted into evidence.)

Q. You heard the officer, one of those officers, testify about the dogs at PAWS, about their rabies tags?

A. Yes, sir.

Q. And did you hear them say that the dogs at PAWS, that not a single one of them has the rabies tags on it?

A. Yes, sir, absolutely.

Q. And did you hear him say that that was for safety reasons for the fence?

A. It is.

Q. What would happen if you put the actual -- with all these dogs, if you put the tags -- just like at PAWS, if you put the tags on the dogs, is that true what he said that it would be a health hazard or a safety hazard?

A. It is. It is. They're constantly sticking their heads in places they shouldn't. They try to climb out of

fences. They do things that dogs do, and they get hung -- if that tag gets hung on a collar on the fence, they can very well hang themselves.

Q. Okay. So you didn't have the actual tags on the dogs; correct?

A. No, I did not.

Q. You had the certificates?

A. Yes, I did.

Q. Have you been to other rescues in Anderson County and different places?

A. Yes, I have.

Q. Have you ever seen tags on any of them?

A. No, sir.

Q. So they all do just like Anderson County does and they don't put the tags on the dogs' necks so the dog won't get choked or get caught with the tag on the fence; correct?

A. Yes, sir.

Q. If you put the tags on the dogs' neck, unlike Anderson County, which doesn't do that, what could have happened to these dogs?

A. Well, the one that had dug -- that had actually torn the hole through the fence and he was going in and out through the chainlink, that would be very hazardous. He could get hung on it. And they pull. Once they get

caught on something, they automatically -- their reflexes, instead of stopping and trying to wait for somebody to come get it off of them is they pull. And when they pull, the tighter it gets and it chokes them. If someone's not there then it can kill them.

Q. Now, is this what you have actually filed with the magistrate's court regarding these rabies certificates? Is this copies of them all?

A. Yes, it is.

Q. Even before these tickets were in this court, did you file something ---

A. Yes, sir.

Q. --- giving them copies?

A. Yes, sir, I did. On March 23rd, I think it was.

Q. Okay.

MR. TONEY: Move to introduce this as Defense Exhibit 6.

THE COURT: Any objection?

MR. MCLAIN: No, sir.

THE COURT: Defendant's Exhibit Number 6 will be admitted without objection.

(WHEREUPON, Defendant's Exhibit Number 6 was marked and admitted into evidence.)

Q. You tried to clear that up -- did you try to clear up the issue of the rabies certificates as soon as you

were charged?
A. Yes, sir, I did.
Q. You didn't just come up with these things before trial and just invent them, did you?
A. No. I had all the rabies certificates in a folder in the large puppy house when they came in, but as they -- they were there for a good probably fifteen twenty minutes before they ever came and got me. And I didn't find any of the rabies certificates when I went back down there.
Q. I want to show you some of these rabies certificates.
A. Uh-huh (affirmative).
Q. Like what do you notice about the pen, for example, used on this?
A. I don't understand.
Q. Is it a thin pen or a thick pen, the ink?
A. It's about medium.
Q. Okay. But some of these are done by different pens; correct?
A. Correct. That would be probably different employees.
Q. Different employees signed them also?
A. No. It would be Dr. Bob.
Q. Dr. Bob? But they were all done by different pens

and maybe different times; right?

A. Right. The law states that the vet is the one that just gives the rabies shot as long as it's -- it's all right if the veterinarian gives it -- or actually he can instruct someone to give it. But Dr. Bob doesn't normally do that.

Q. Did you have these certificates when Anderson County came?

A. I thought I did. They were supposed to be in a folder just inside the door in a box in the big, large puppy house.

Q. Did you have them then?

A. I couldn't find them.

Q. And there was a lot of police there?

A. There was very many police.

Q. And you were arrested?

A. I was -- yes, uh-huh (affirmative).

Q. Okay.

A. I found one when I got out of jail.

Q. Let's go back along to the report. The next dog that's problematic is 1266.

A. 1266.

Q. I'm going tp go into -- actually, let me backtrack to 921. You heard the vet say this dog was thin and responded to a regular diet?

A. Yes, sir.
Q. How long had you had this dog?
A. I'd had him from the 4th -- since the 4th, so I'd had him a little over a week.
Q. Okay. Over time, do you believe this dog would have not been thin, would have been more regular in weight?
A. Oh, sure, he would have gained weight.
Q. Okay. Do you ever get thin dogs that -- when people give them to you, are they ever thin?
A. Absolutely.
Q. And do you fatten them up?
A. Yeah, I do.
Q. All right.
A. Almost too fat. There were -- comments were made -- when they were seizing the dogs, my father overheard somebody saying they were too fat.
Q. Okay. The next dog is 1266 on this list.
A. That's a cat, the domestic ---
Q. I'm sorry. Cat. What's -- now, this is the one the vet said was crusty around the eyes, noes, anus, itchy?
A. Yes.
Q. And had food allergies?
A. Uh-huh (affirmative).
Q. What's the deal with that cat? That cat had -- the main problem was hair loss and some crust?

A. He has been there -- he's been there for a couple of months. He clears up or starts to clear up with antibiotics, but as soon as the antibiotic round is done, he usually -- he goes back into something else. I've tried him on four or five different cat foods, and that doesn't seem to be the end all be all to the problem. There's something else besides just a food allergy. I don't know if it's a soy or -- I haven't had him completely fully tested for everything. I had him feline tested and leukemia tested, but I didn't have him -- it gets very costly to start testing for allergy.

Q. But you have tried different procedures by changing the food?

A. Absolutely. He responds with oil in his food. It seems to give him a little bit more oil to his skin. It helps. He does leave sometimes. He's another cat that I'm not real sure where he came from. There's a feed mill just above me there, and they have about forty or fifty cats of their own that wander the neighborhood. And we also take in animals that are feral, the feral cats. The C.C.A. does a program to where they trap and have the cats spayed and neutered, and we take those cats in too because they have room to run. It's five acres. It's down next to a landfill. There's a hundred and twenty-eight acres. It's a C.E.D. landfill, so they have

ample room. Of course, it's all around there, so they have ample room to get out and play and then hunt and all that stuff. So that sometimes the C.C.A. will come down and release some, and we try to keep up with them as best we can. But they do wander. The wild ones wander.

Q. The next one that's sort of problematic but apparently not that problematic was 1767?

A. 1767. Okay. That's one of the boys, one of my boys. He was one of the Bassadors. They've got him down as a Terrier/American Pit Bull/Basset Hound white black spotted medium. That's Batman.

Q. You might have to show me that one.

A. He is right after -- they've got him down as a medium/medium large.

Q. The only listed problem with this dog was ---

A. Is he was unsocial.

Q. Unsocial?

A. Uh-huh (affirmative).

Q. And I think the vet testified dogs are unsociable for different reasons; is that correct?

A. Correct.

Q. And she also agreed that the overwhelming testimony is just all these -- about all these dogs were very sociable; is that correct?

A. Yes.

Q. Can you have a -- is it possible to have, say, one unsociable dog among many sociable dogs?
A. Absolutely.
Q. Just like with people where you might have a group of friendly people and one person who's unsociable?
A. Yes. You might have a -- like in his case, he loves kids. He loves children. You know, little people, he loves them. Goes right up to them. He's fine with them. But he doesn't like adults. The way they came in that day, they scared a lot of them, and the way they proceeded to handle as they took them out.
Q. Tell me, how did you get this dog? What's his name? Batman?
A. Batman. He's the brother to Petey and Spot.
Q. What's the deal with Batman?
A. Batman, he's just -- he was one of the three that didn't get a home out of the eight. And so he ended up with me. He's just a good 'ole boy. His little legs and his feet point out this way. You know, his legs aren't but about that long. It's funny to watch them run. They chase the cats, and the cats will stop and wait for them to catch up to them because their little legs aren't but this long. They can't run.
Q. He's got funny ears too?
A. He's got funny ears.

Q. And feet point out?
A. Front feet that point out. And his big knobby knees.
Q. A little -- he's ugly?
A. He's pretty much ugly, yeah.
Q. All right.
A. But he's adorable to me.
Q. The next one that was maybe problematic was 2316.
A. That's the chocolate Cocker. That's Poo Bear.
Q. What was the -- this is a Cocker X?
A. Uh-huh (affirmative). A Cocker mix is what they have him down as.
Q. Okay. Mix. I'm sorry.
A. Uh-huh (affirmative). Several vets have said he's Cocker-poo. And they -- what I'm hearing about Cocker-poos is any chocolate Cocker-poo is going to have skin issues for some reason. I have asked them to explain that to me, and they get into the genetics or the breakdowns of the genetic formations and all that mess. And I don't understand most of that, so ...

He has been adopted twice. His last time was in New York City. He lived in New York City for a little over a year. And he lost all of his hair, his skin crusted up. He went through the whole mess.

Q. This is the one with mites; correct?

A. Yes, this is the one that she has said he has mange. It's not simply mange. This dog has major, major skin issues. When his hair comes out, he stops eating. He will bark at a ball, and he just stops everything. Otherwise, he's a very happy dog. He's got a beautiful coat when it's there, but he's -- it's there one day, and the next day when it starts coming out, there's nothing you can do about it.

This one lady in New York City spent over ten thousand dollars on veterinary bills trying to find a way -- she had him. When she sent him home to me, she had him on every holistic vitamin that you could possibly -- it would have taken hours every day just to give the dog the number of vitamins and things that she had him on. We've tried probiotics. He's been on special diets. Every time you change him to something else, he gets better for a while. Sometimes it's two months; sometimes it's six months. He's been known to have his hair completely for a year. But sooner or later, he is going to lose that hair. His skin's going to crust up. He's going to go through that whole miserable thing again. And then it comes back and starts over.

Q. Someone spent ten thousand dollars trying to fix this?

A. Spent ten thousand dollars. Yes, she did. She did.

Q. And how long have you had this dog?
A. He has been in and out of my place now for about five years.
Q. What do you mean in and out?
A. He's been adopted twice. He lived in New York City for about a year and a half, and he lived in Virginia for almost three.
Q. This dog is virtually unadoptable; correct?
A. Everybody wants him when he's got hair. And we represented -- the lady in New York adopted him knowing that he had skin issues. But her words to me when she brought him back was that she didn't know they were that bad. Because when he -- when it goes bad, it's severe.
Q. The next problematic dog is 2785. And this is a Pomeranian mix, little white small?
A. Uh-huh (affirmative).
Q. And I say problematic. If you remember, the vet testified that, yes, this dog had necessary sustenance and shelter?
A. Uh-huh (affirmative).
Q. But I left the dog off that initial list because the dog had hair loss.
A. Correct.
Q. And I figured I'd let the jury sort that one out, ask the Judge to let the jury sort it out.

What's the deal with this dog here?
A. He's got flea allergies.
Q. Flea allergies?
A. Flea allergies.
Q. What kind of treatment have you given this dog?
A. Revolution.
Q. Revolution. What's Revolution?
A. Revolution keeps the fleas off of them, and it kills -- you know, it helps to get their hair -- helps with hair loss. It makes it grow back a little quicker. Seems to anyway.
Q. Do you remember the vet saying this dog did have the necessary sustenance and shelter?
A. Yes, I do.
Q. But we kept that dog off of Defendant's Exhibit 3 because there was some question. I believe it wasn't a perfect bill of health on that one; correct?
A. Right. Right.
Q. Okay.
A. But he has flea allergies. It's just that simple.
Q. And how long have you had this dog?
A. I had him for maybe two months.
Q. Two months?
A. Maybe.
Q. And how many courses of Revolution have you given

him?

A. Two. He gets it every three and a half weeks or so. That's when I put him on it just to be sure that he gets more.

Q. So he's got hair loss due to fleas?

A. Uh-huh (affirmative). He can get one flea on him, and he goes nuts.

Q. Really?

A. Uh-huh (affirmative).

Q. All right. The next one that is sort of problematic -- I'm not even sure where I'm at now. What number did I just read to you?

A. That was 2785.

Q. 2785? Is 2840 ---

A. 2840? That's a nursing -- no.

Q. Let's just go through all these dogs in Exhibit 3. Are they nursing dogs?

A. These dogs are the puppies to the ---

Q. They're not nursing with the puppies?

A. Right. And they kept saying that the chocolate -- Pooh Bear was up there with the baby girl and her puppies. And he wasn't up there when I left. So he had gotten up there at some point before they took the pictures evidently. But he was not kept with -- he wouldn't hurt them anyway. But he was not kept with the

mother and her babies. That area up there was strictly mom and babies.

Q. Okay. Did you hear the vet say she -- that there was a male dog around?

A. That's the one I'm talking about. That's Pooh Bear. He was the one with all the hair loss. He's the one with the major skin issues.

Q. Has that vet ever been at your place?

A. She has been at my place, but I don't recall her being there that day. I didn't see her there that day, but ---

Q. When has she been there? When was the last time before this?

A. Last year. She was there last year.

Q. Before this happened?

A. Yes, uh-huh (affirmative).

Q. And how long ago is that?

A. A year.

Q. A year?

A. Uh-huh (affirmative).

Q. And these are puppies; right?

A. These are puppies, yes.

Q. So all these issues with these nursing dogs or whatever, she's not been there; right?

A. No, she has not.

Q. These puppies are how old?
A. They're -- I guess they're -- at that time, they were still -- they were about four weeks old, I guess, at that time.
Q. And she hadn't been there in that four weeks, had she?
A. No.
Q. Maybe a year before that?
A. Yes.
Q. And your testimony is they were not around the male, whatever the issue was?
A. No. I had put up a barrier, a cage. I had taken apart a cage and put it up over the threshold where you would walk up into the space. And that space up there has linoleum floors. And if you look real closely at those photos, the pee pads are fresh. Those are pee pads down where the poop is.
Q. Yeah.
A. Because mama's pee pad trained, and I was working on the puppies. Might as well do it while you can because people appreciate the dogs being pee pad trained or housebroken when you send them home. So when you've got a puppy like that, I try.
Q. I'm going to go to 4275. I'm going to skip the nursing because I think you've handled those dogs. 4275,

which is near the end of the list?

A. The Doberman. That's Deuce.

Q. Hang on for a second. Well, you know what? Let me back up for a minute.

A. Okay.

Q. There's one 3933. What's the deal with that dog? That's a black -- a Chinese Shar-pei, Retriever Labrador, blonde, large? 3933.

A. I'm sorry. I can't go by just what they call them because nobody identifies them the same, so -- most of the time anyway.

Q. Here, let me show it to you.

A. Okay. That's great.

Q. That's it?

A. Oh, that's Polly. Yes. That's the one they said had hookworms. He has been with Maggie, the one that they thought was dead, in the dog house. He's been with her now for seven years.

Q. What do you mean been with her?

A. They're running buddies. They are inseparable. They stay together constantly. When one goes to lay down somewhere, he follows her and they stay together constantly. They do get worm -- they get monthly heart worm preventative. And that is supposed to have something in it to cure the intestinal parasites. She

didn't have worms. It's just one of those flip things. But that's Polly. Polly's been with me a very long time. Polly actually came from Anderson County about -- going on ten years ago now.

Q. Anderson County PAWS?

A. Well, it was PAWS then. It was just the shelter, but he came to me as a Dachshund mix.

Q. What ---

A. They originally said he was a Dachshund mix, and he's got to be ...

Q. Why did this dog come from the shelter?

A. He was on the euthanizing -- they were going to euthanize him as a puppy. He was just a baby too. They were going to euthanize him. He's been on Pet Finder. He's been on everything under the sun. Not one person has ever even inquired about this boy. And he's a sweet, sweet boy. He's so good. He's a good boy. He's a Boxer -- mostly Boxer mix.

Q. If you hadn't gotten that dog, where would that dog be now?

A. He would have been dead for the last ten years.

Q. That dog there is listed as -- tell me the diagnosis of those four separate exams.

A. They've got him down the first exam on 3/18 at ten fifty-seven a.m. Says he's injured. The second one at

four fifty-nine say he's injured. Then there's one at 3/18 at five thirty-two that says he appears normal. Then at 3/19 they've got him down as injured. He didn't have a place on him when I was there. If they put one of those catch poles around his neck, he probably cut flex. Most of them will with a catch pole.

Q. Speaking of these catch poles, did you have some security cameras?

A. I had fifteen.

Q. Fifteen?

A. Uh-huh (affirmative).

Q. Were we able to retrieve any video at all?

A. I had tons of video until about three days after the incident. Someone broke into my place. They cut a link that had been started to be cut. Came into there at my place and threw my VCRs -- DVRs in the middle of the floor, which damaged them. And I've got a company in California right now trying to retrieve the video off of the one that shows the dogs being taken out and the officers coming in.

Q. When people get arrested and go to jail, to your knowledge, are they sometimes targets of break-ins and things like that?

A. I didn't think so, but I don't know. I'm not sure about that.

Q. Do you have any video from your security cameras?
A. I have two that I had put on my Facebook page.
Q. Did you manage to get them on a disk?
A. You've got the disk; correct?
Q. Does it work?
A. It did yesterday morning, yes.
Q. And this is from the security video of -- when the animal control deputies came?
A. That's camera five, and it is of Spot and, I think, -- I think it's Spot and Petey.
Q. That's all you were able to retrieve?
A. So far, yes. They assured me that all of the videos were on this video.
Q. Is this all you were able to retrieve?
A. Yes. Yes, at this time.

MR. TONEY: I move to introduce this video as Defendant's Exhibit Number -- what is it, 7?

THE COURT: Mr. McLain?

MR. MCLAIN: Your Honor, I've never seen the video. I have no idea what's on the video.

THE COURT: Let's take a break and allow the solicitor to review the proposed exhibit.

Mr. Bailiff, would you take the jury to the jury room?

(WHEREUPON, the jury exited the open court at

approximately 10:17 a.m.)

THE COURT: We'll go into recess. Mr. McLain, you look at the exhibit, and then we'll go back on the record and see if you have any objections.

All right. While we're taking a break, I have another matter that I need to deal with. So if y'all ---

MR. TONEY: We can go outside.

THE COURT: --- can watch this outside.

All right. Ms. Sheridan, you're still under oath. You're still on the witness stand, so you can't discuss the case with anyone until you're finished testifying.

THE DEFENDANT: I understand.

(WHEREUPON, court stood at recess for a short break.)

MR. TONEY: This isn't working. We're just going to move on.

THE COURT: Okay.

All right. Mr. Bailiff, would you go get our jury, please?

THE BAILIFF: Yes, sir.

(WHEREUPON, the jury entered the open court at approximately 10:49 a.m.)

THE COURT: All right. Mr. Toney, you may proceed.

DIRECT EXAMINATION

CONTINUED BY MR. TONEY:

Q. When you were released from jail ---

A. Uh-huh (affirmative).

Q. --- you came back to the house?

A. Yes, I did.

Q. Did you take any pictures at that time?

A. Yes.

Q. Did you do anything at all to the place between when you got out and you took the pictures?

A. No, I did not.

Q. All right. And these pictures were taken immediately when you got back home or when?

A. Absolutely.

Q. When were they taken?

A. Immediately when I got back home.

Q. How immediate is immediate? Within one hour? Two hours? Three hours?

A. Within thirty minutes.

Q. Thirty minutes? Okay. Please identify this picture right here.

A. Okay. This is just a kennel out in the yard. Just a dog kennel.

Q. All right. And this -- I think I'll just get you to identify all of them. This picture here?

A. That's the inside of the large puppy house.

Q. And this one here?
A. That is also the inside of the large puppy house.
Q. And this one here?
A. That's one of the outdoor kennels.
Q. And this one here?
A. One of the outdoor kennels.
Q. And this one here?
A. This is a long row of kennels that I've got on this back side.
Q. And this one here?
A. There's individual kennels to the side.
Q. And this one here?
A. It's a large kennel.
Q. And this one here?
A. The water bucket.
Q. And this one here?
A. The water bucket with water still in it, full.

MR. TONEY: I would move to introduce these as Defense Exhibit -- however the court wants me to caption them.

THE COURT: Has the solicitor reviewed them?

MR. MCLAIN: Yes, sir.

THE COURT: All right. Do you have marks on the exhibits where they can be identified separately?

MR. TONEY: No, I don't.

THE WITNESS: I can put the names of them ---

THE COURT: We'll mark them all separately on then.

MR. TONEY: Okay.

THE WITNESS: I can put the dog names on them.

THE COURT: Ma'am, don't testify while we're doing it.

MR. MCLAIN: Your Honor, I would object for the record to them being entered into evidence based on relevance.

THE COURT: All right. I overrule the objection.

Mark each exhibit.

MR. TONEY: Yes, sir.

(WHEREUPON, Defendant's Exhibit Numbers 7 through 16 were marked for identification only.)

THE COURT: All right. What exhibit numbers are these, Mr. Toney?

MR. TONEY: I'm not sure.

COURT REPORTER: I'll have them in just a minute, Your Honor. It will be numbers 7 through 16, Your Honor.

THE COURT: Okay. Defendant's Exhibits 7 through 16 would be admitted.

(WHEREUPON, Defendant's Exhibit Numbers 7 through 16

were admitted into evidence.)

THE COURT: Okay. Proceed.

Q. By way of backtracking, the very last dog we were talking about had -- and I forget which one it was, but ---

A. It was the Lab mix. It was Polly.

Q. And it was listed as injured on one exam ---

A. Yes.

Q. --- and normal on the rest?

A. Yes.

Q. What's the story on that dog?

A. That's the dog that I was saying had been with me for a very long time. The one that had worms.

Q. Okay. And was this dog injured?

A. Not to my knowledge.

Q. Did you hear the officer talk about using catch poles and how they're dangerous?

A. Yes, absolutely.

Q. And did they use catch poles with these dogs?

A. Yes. Yes, they did.

Q. And what is a catch pole?

A. A catch pole is a long stick with a noose at the end of it. And the way they use them, they lock it around their necks, and then they twist it and it tightens up the noose. And it's just a fine wire. It's not

something that's ---
Q. It's like a noose on the end of a stick?
A. It is a noose on the end of the stick. And they actually pick these dogs up by the noose. They hold them -- these dogs would be dangling at the end of the stick as they put them onto the truck. They lift them by their neck.
Q. And that's for the safety of the officers; right?
A. My dogs, all you got to do is say, hey, let's go for a ride, and they would hop into the truck with you.
Q. Now, this dog here was listed as having injured in one of their exams and not injured in the rest?
A. Right.
Q. So do you think the dog was injured?
A. Probably.
Q. Okay. But whatever it was, it wasn't enough for PAWS to even notice it on several of their own exams; right?
A. Right.
Q. Was the dog injured when you had a dog?
A. No. No.
Q. Is it possible the dog had some minor injury ---
MR. MCLAIN: Your Honor, that calls for speculation.
THE COURT: Sustained.

MR. TONEY: Okay.

Q. These pictures here, what is Exhibit 7?

A. That's a picture of a water bucket, one of the water buckets.

Q. And where was that bucket taken -- that picture taken?

A. It's located on the inside of a kennel.

Q. Which kennel?

A. If I'm not mistaken, it's this one. It's this first one, the first large one off to the side.

Q. And what does that bucket show?

A. It shows it's got water in it.

Q. And when was that water placed in there?

A. It had to have been on the 17th.

Q. Okay. And then the next is Exhibit 8. And what's that?

A. Just another picture of the water bowl. And beside the water bowl, you can see where they pulled the blanket out of the dog house. And you see a few pieces of food lying around.

Q. Okay. Is that ---

A. That's on the long row of kennels up against the fence.

Q. Just as an observation or as a question, was a single one of these dogs listed as dehydrated?

A. No.
Q. By PAWS?
A. No.
Q. So to your mind, what -- did all of these dogs have water?
A. Yes.
Q. So these dogs were examined four times; right?
A. Yes, sir.
Q. By PAWS?
A. Yes, sir.
Q. On many occasions?
A. Most of them, yes.
Q. Sometimes three.
A. Yes.
Q. Did a single one of those -- have you looked at these PAWS notes?
A. I have.
Q. Do a single one of them show dehydration?
A. No, it does not.
Q. You heard the vet testify?
A. Yes.
Q. On every single dog, did she not say or did she say that the dogs had adequate sustenance?
A. Yes.
Q. Okay. All right. Now, on Exhibit 9, what does that

show?
A. That is one of the kennels out to the side. The lower kennels is next to the back side of the fence, and then there's one -- there's five kennels that go straight out from the back side. And they're all separated, and they're all up on the composite deck boards, which they've been like that ever since I put the kennels on them. They've been like that for ten years or better. Twelve years.
Q. Now, what is Exhibit 10?
A. That's the inside of the puppy house.
Q. What's the puppy house?
A. The puppy house is the large building that -- it has heating and air in it. It's where the dogs and the cats go to eat and sleep, whatever they choose to do.
Q. And why do they have a puppy house?
A. Huh? I'm sorry?
Q. Why is there a separate place for the puppies?
A. It's just what I call it. It's just -- all my buildings are called puppy houses. It's puppy house one, two and three. There used to be. But now I don't keep them in cages like I used to. So I give them free reign. If they're sociable enough to get along with each other, then they can free reign.
Q. The next one is Exhibit 11. What's that?

A. That is where the puppies were actually being kept up in the large puppy house.
Q. And what's in that picture?
A. It's the benches that come off to the side of it, and then you've got the case that I took apart and stretched across the opening there. You walk up two steps to get up into that area. And that's where the puppies and mom was. The black container that's sitting down on the floor wasn't in the floor when I left. It was on the shelf. And I don't recall this stuff hanging off. It wasn't quite as messy as it is in this picture, but they went through everything.
Q. All right. Now, what's this picture, number 12?
A. This picture is of the very first kennel right outside my -- well, it's the first row. It's the first kennel, the first row sitting in a long line against the fence.
Q. Is the dog bowl over?
A. The bucket is turned over, yes.
Q. Bucket?
A. Yes, it is.
Q. Okay. Was the bucket turned over when you were there?
A. Not that I'm aware of. But I hadn't really started work that morning, so I don't know. You know, dogs do

turn over water buckets in the middle of the night ---
Q. Sure.
A. --- if they see a squirrel or if something goes across the yard. And they do tend to bark and play at night.
Q. Okay. What's this picture here?
A. That is another kennel. It's on the far end. The puppy house. It sits -- this is the back side of the puppy house here. And I've got two kennels here, and then I've got this one.
Q. What's that?
A. That's where Bear was.
Q. What's that little orange thing in the corner there?
A. That little orange thing is a water bucket in one of the far kennels.
Q. And that little orange thing?
A. Same thing.
Q. And that?
A. Same thing.
Q. And that?
A. Same thing. It's all water buckets.
Q. And that?
A. They are all water buckets.
Q. And that?
A. They are water buckets from the Home Depot

Q. Okay. And did those buckets have water in them?
A. All the buckets had water in them to my knowledge.
Q. All right.
A. Unless they turned it over in the night, which is not impossible. I don't know anywhere that you could go that houses animals and you're not going to find an overturned bucket or piles of poop in the morning.
Q. And PAWS did -- we're talking sixty dogs here?
A. Yes, sir.
Q. An average of three to four exams?
A. Yes, sir.
Q. So over two hundred and forty exams, not one single one was -- does a single one out of those two hundred and ten, two hundred forty-seven exams say dehydration?
A. No, sir.
Q. All right. Picture number 14. Exhibit 14.
A. This is the row of dog kennels. These are a little bit larger than the regular -- the other dog kennels because they all fit together. And I've got the composite deck boards up to separate the dogs so they don't get at each other through the fence. Sometimes they will do that. So just to be safe, I put the larger dogs in there.
Q. All these dogs have water?
A. Yes.

Q. In your mind, would it be possible for them not to have water when PAWS has done two hundred and forty exams showing no dehydration? Is that even remotely possible even on ---

MR. MCLAIN: Your Honor, that calls again for speculation.

THE COURT: Sustained.

MR. TONEY: All right.

Q. What's this?

A. This is the kennels. The first -- well, it's the second row of kennels towards the front side of the yard.

Q. And what does that show?

A. That's showing -- well, in this particular kennel, they've got a feeder. So there was -- that silver thing hanging on the fence is a feeder. You pour the food into that, and they can go over there and push the little door and it comes out in the water bucket.

Q. And Number 16?

A. A water bucket. And that kennel's really clean, so ...

Q. Did you attempt to neglect these dogs in any way?

A. Oh, absolutely not. I'd spent all day the day before with them before I went to the hospital.

Q. What did you go to the hospital for?

A. To see my mom. She was in there.

Q. What was going on with your mom?
A. She was in critical care at the time.
Q. With what?
A. She had a really rare disease.
MR. MCLAIN: Your Honor, this is not relevant.
MR. TONEY: I believe it is.
THE COURT: Overruled.
A. Job's Syndrome.
Q. Job's Syndrome?
A. Yes.
Q. What's Job's Syndrome?
A. Job's Syndrome is a deterioration of the immune system. She made -- her body would make too much protein, and it eventually shut down her heart and her kidneys.
Q. So during this time you were also taking care of your mom a little bit?
A. Yes. And I take care of my father too. He's disabled. He's seventy-one.
Q. Okay. This meth, explain what -- what's the deal with this residue or whatever it is that they've introduced?
A. I never saw that. I picked it up, put it in my pocket. It was just barely getting daylight outside. I came in from the hospital, I parked the car and got out.

And as I was walking up to my fence, I picked up some cotton out of a couple of dog toys. I do that every day. I walk around with crap in my pockets constantly. I think there was a -- that they didn't mention -- there was a screw in my pocket, some cotton out of a dog toy. And I pick things like that up all the time. I found one two weeks ago I've got photos of that was also in my driveway.

Q. Well, how do you explain that being in your drive?

A. I live in Slabtown.

Q. Okay.

A. They claim -- and I don't know this for a fact. But they claim that seven out of ten homes in Slabtown is either on drugs, making drugs or selling drugs. And I don't ---

Q. It is a high crime area?

A. It is a high crime area. It is a high drug area.

Q. And the sheriff's office designates things as high crime areas; correct?

A. Yes. The detective from narcotics at the sheriff's department is the one that informed me of the ratio.

Q. All right. And what do you believe happened? Where do you think that came from?

A. Well, probably ---

MR. MCLAIN: Your Honor, calls for speculation.

MR. TONEY: I think she's entitled ---

THE COURT: Overruled.

A. For instance, last year I was cutting grass, and I ran over something. I looked back, and it was bag baggie. I probably ran over -- I don't know -- a bag full of marijuana. I just continued to chop it up. Things get thrown out ---

Q. Where do you believe this meth came from?

A. Either somebody's went down the road and threw it out, or somebody was up at my fence and dropped it.

Q. And why do people throw things out of cars in your area?

A. It's a big straightaway right there in front of my house. And people speed down through there all of the time. But a lot of times if they get somebody, a car, behind them -- and I don't know if they're paranoid or what. They do tend to throw things out.

Q. All right.

A. All the neighbors find it. You can go up and down the street and ask any one of them and they'll tell you they find something.

Q. Do you use any kind of meth? Have you ever used meth?

A. In my younger day, I've done drugs, yes.

Q. When was that?

A. And when I was a teenager -- when I was a teenager.
Q. Okay.
A. But I have not done anything in many, many, many years.
Q. How many years is many, many, many years?
A. Thirty, at least. Thirty-five.
Q. Okay. You don't have any kind of criminal record of any kind of drugs, do you?
A. No, I do not.
Q. Not a single charge?
A. Not a single charge, no.
Q. All right. You don't do drugs; correct?
A. No, sir. I don't have a single charge for anything except for this. The only thing I've ever been charged with is just dogs.
Q. And that's magistrate court stuff; correct?
A. Yes, correct.
Q. All right. And did you know what that bag contained?
A. I did not. I never saw the bag. She didn't even let me see the bag. I didn't even know if there was anything in it or not.
Q. Okay. You heard them say point zero six grams?
A. Zero point zero six, yeah.
Q. Okay.

A. That's minute at best. I wouldn't have noticed that.

Q. All right. Now, when the officers came on this wellness check or whatever it was ...

A. Yes, sir.

Q. ... was it a -- how many officers came?

A. They showed up all at one time. There was at least nine cars and probably twelve officers.

Q. You say they showed up all at once?

A. Yes, they did.

Q. Okay. Do you ---

A. And my neighbors -- I'm sorry. Go ahead.

Q. Do you feel that this was a wellness check?

A. No, sir, I do not.

Q. What do you feel it was?

A. As my neighbors have kind of told me, I agree with her ---

Q. I have to ask you not to say what your neighbor said. What do you feel it was?

A. I feel like it was a raid.

Q. Okay.

A. Yes.

Q. And were there helicopters there?

A. Yes, there were helicopters there. The news media was there almost immediately. When they walked up from

the puppy house -- I didn't even know they were there -- and took me out of my house, my parents' house, they were ready to put the handcuffs on me then. And I had no idea even what they were doing there.

Q. And indeed ---

A. They were very short and ---

Q. Indeed their own logs ---

A. They never even read me my rights until they had me in the car.

Q. Their logs have been introduced into the record.

A. Yes, sir.

Q. Their logs show that you were -- they requested a paddy wagon or transport almost immediately; correct?

A. Yes, sir.

Q. Do you believe the officers had already made up their minds what they were going to do before they even showed up?

A. Absolutely.

Q. Is there anything we haven't covered?

A. I'm not sure. There's lots of things we haven't covered.

Q. Is there anything relevant we haven't covered?

A. Not that I know. I'm not sure.

MR. TONEY: That's all the questions I have of this witness.

THE COURT: All right. Mr. McLain?

CROSS-EXAMINATION

BY MR. MCLAIN:

Q. Ms. Sheridan, you did say earlier you do live at 818 Hamlin Road in Anderson?

A. Yes, I do. Well, I live at 824 now, yeah, for all intents and purposes. They own the entire property.

Q. On March the 18th of this year, you lived there?

A. No. I was staying at my father's. My mail comes to 818 and the mail for the rescue comes to 818, but there's no one lived there per se in two and a half years now, three years.

Q. Other than an extremely large number of animals?

A. There's not been any animals living in the mobile home if you're referring to the mobile home. The mobile home has been vacant.

Q. Let me ask you something. Do you have a cell phone?

A. I do.

Q. Do you put that cell phone in your pocket sometimes?

A. I do.

Q. So would you say you possessed that cell phone being in your pocket?

A. I put it in my back pocket usually.

Q. That's in your possession, your cell phone?

A. Yes, it is.

Q. So going on that same line of reasoning, if you have something in your front left pocket, you would be in possession of that as well?
A. I would be.
Q. So you were in possession of the meth that was found in your pocket?
A. I was in possession of something I had picked up in the yard and placed in my pocket along with many other items.
Q. So you are saying you were in possession of the meth?
A. I did have it in my pocket, yes, sir.
Q. You said earlier that you work how many days a week for the veterinarian?
A. Usually about three.
Q. And how many hours a day do you work?
A. It depends. I could go in for two; I could be there all day, which would be an eight, nine hour day.
Q. And when you had sixty animals in your possession back in March, were you still working for the vet back then?
A. Yes, I was.
Q. So how many hours did you spend just taking care of sixty animals a day?
A. I spent every day, but I also have two people that

come and help me.
Q. And you provide those animals with adequate medical care?
A. Absolutely. They go anytime they need to go.
Q. So it's just a coincidence that once the animals were taken to PAWS and given clean shelter and adequate treatment that they're thriving now?
A. The ones that are thriving now weren't with me long enough to have a chance to thrive at my place. You took them -- they were taken before they had a chance.
Q. You said earlier that your dogs were not wearing tags that day?
A. Exactly. Yes, sir.
Q. As the law requires. Would you agree with that?
A. Yes, sir, I do agree with that.
Q. And you said the reason was because it was a choking hazard?
A. Yes, it is.
Q. This is State's Exhibit Number 5. Were you not concerned with that choking hazard?
A. Yes, sir, I was. And he was not normally in this kennel. He had just been put in there the ---
Q. Just that day?
A. --- the day before.
Q. Everything just happened that day?

A. No, not everything. Not everything.
Q. And what was the choking hazard for this dog and the reason it didn't have a tag?
A. This dog is not in a kennel.
Q. Right. So why didn't it have a tag?
A. He doesn't need a tag. He's at the rescue. And this dog right here is sixteen -- he's sixteen years old.
Q. So you don't have to follow the law?
A. He's sixteen years old. No rescue keeps ---
Q. So because of age, you don't have to put a rabies tag on a dog?
A. Being a rescue, none of us put rabies tags on dogs. I'm not saying that we don't have to. We just don't do it because of the hazards.
Q. And when did you say was the last time you cleaned out that crate?
A. It was the day before, early morning.
Q. So I'm counting ---
A. So it would be the 17th.
Q. --- one, two, three, four, five, six, seven, eight, nine, ten, eleven, twelve piles of feces.
A. If they would testify to the fact that is a poop machine. That little boy right there, when he eats, it goes in one end and out the other.
Q. You don't think that ---

MR. TONEY: Your Honor, I would ask that my client be allowed to answer the questions.

THE COURT: All right. Allow the witness to answer the question before you ask another.

A. It's just like children. Some children poop more than others. Some humans poop more than others.

Q. You don't think that if the animal is pooping every two hours that you should probably seek medical treatment for that animal?

A. No, I do not. He is a perfectly healthy dog. He has been to the vet many, many times. He's actually a blood donor for Dr. Bob when he needs him. He's a very, very healthy dog.

Q. So you do admit that the dogs were not wearing rabies tags; correct?

A. Yes, I do. It's just as ---

Q. And you -- go ahead. I'm sorry.

A. As in Anderson County, they do not wear rabies tags. The law also states -- it says nowhere in the law that I have to produce rabies certificates, but I do keep those.

Q. And these evidently are the rabies certificates you kept?

A. Yes, they are. Uh-huh (affirmative).

Q. It appears that about half of these at the top it says, "veterinarian's copy." Are you the veterinarian?

A. No, I'm not. But my copies had disappeared that day. I found one of them at the end of my driveway when I got out of jail.

Q. So you actually didn't have these copies; you just got these when you got out?

A. No. I got those from my veterinarian when I got out of jail.

Q. So your vet's actually not keeping the proper paperwork that he's supposed to be keeping right now?

A. Well, of course he does. He has several copies of these. They come in triplicates, duplicates, you know, quads. There are many copies of the rabies certificate.

Q. Ms. Sheridan, you said earlier that Dr. Powell, who testified earlier in this trial, had been out to your property the previous year?

A. Uh-huh (affirmative).

Q. Why did she come out to your property?

A. She came out when they came out and took the hundred and nineteen that they took the year before.

Q. So they took a hundred and nineteen dogs the year before?

A. Yes, they did.

Q. Did they take every animal off your property that day?

A. No, they did not.

Q. How many did they leave?
A. Which time? At the hundred nineteen or March the 18th of this year?
Q. The hundred and nineteen from the year before, the last time Dr. Powell was out there.
A. They left cats and dogs that time.
Q. How many? Do you remember?
A. I don't recall. They left animals this time too.
Q. And I want to clarify something. You said earlier that this male dog that Dr. Powell testified should not be around puppies was never allowed in here, but you also testified that the dogs have free reign. So could you -- which is it? Do they have free reign?
A. If you see right here -- if you look in the other photos and see right here, this is a barrier that I took apart a kennel, as I explained before, and I put it across the opening to that room. The puppies and the mom cannot climb over or under or anything else. It's all attached.
Q. So this dog who could barely walk jumped over that barrier?
A. He wasn't barely walking, but I have a feeling that probably one of the officers opened up the barrier to go in and let him in. Same way as on this porch. There was no animals on that porch. That has a very heavy latch on

the doors, and they were opened up.

Q. You mentioned -- going back to when a hundred and nineteen dogs were seized -- or animals -- excuse me.

A. Uh-huh (affirmative).

Q. I don't know the exact split between dogs and cats. Why were those dogs taken?

A. I have no idea.

Q. You don't have any idea? No one has ever told you?

A. Oh, yeah, they claim -- I know what they claim, but I don't agree with it. Those animals also, by their own paperwork, were in good condition. I had a lousy lawyer. And I was also going through both parents being sick, and I wanted it to end. I think it's a fund-raiser more or less.

Q. Excuse me?

A. I think it's a fund-raiser. I think that Anderson County PAWS knows that they can come to my place because I'm one of the largest rescues there was in South Carolina. They seize my animals. They make it a very public figure, and it's a fund-raiser.

Q. Speaking of fund raisers, didn't you mention you are tax exempt?

A. I am tax exempt.

Q. With the IRS?

A. Yes, I am.

Q. So basically this is a fund-raiser for you to bring animals; correct?
A. I don't do fund-raising. I pay out of my own pocket. I pay for the animals that I bring in. I paid PAWS for the animals when I rescued animals from PAWS. The only animals that I get free are the ones that are brought to me by people that are too concerned to take them to a shelter.
Q. These pictures, Defense Exhibits, I believe it's 7 through 15?
A. Uh-huh (affirmative).
Q. Or 8 through 15?
A. Yes, sir.
Q. What day were you released from jail?
A. I was released on that Friday.
Q. What date was that?
A. That would be the 18th, 19th, 20th?
Q. The 20th? Something like that?
A. I suppose.
Q. And you said you took these pictures after you got home and cleaned up the kennels?
A. No, I did not clean up kennels. Those photos were taken -- if you look back into the Anderson County evidence, those photos were also in Anderson County evidence. They just won't show them in court. I saw

those photos in Anderson ---
Q. And so these photos were taken on the 20th; correct?
A. Yes, sir.
Q. And so this actually doesn't show the condition on the 18th when these charges were made; right?
A. Well ---
Q. You would agree with that; right?
A. I would agree with that.
Q. It doesn't show the condition; right?
A. No, it does not.
Q. Now, earlier on in your testimony, you mentioned you're a by-the-book kind of person; right?
A. I am, very much so.
Q. And you would agree that the law requires you to keep your dogs with rabies tags?
A. I do. And I do keep the rabies tags.
Q. So why don't you follow that book?
A. Because I'm not going to ---
MR. TONEY: Objection. Asked and answered.
THE COURT: Allow the witness to answer the question. I'm going to overrule the objection.
THE WITNESS: I'm in the business ---
THE COURT: Ma'am?
THE WITNESS: Sir?
THE COURT: You ask the question.

You answer the question.

Let her finish her answer.

MR. MCLAIN: Yes, sir.

A. I'm in a position to save their lives, not take them.

Q. My question was why don't you follow the rules of wearing tags?

A. Because I'm not going to put a tag on a dog when it has the potential to cause death. I'm not going to do that. No shelter, no rescue does that. If there were guidelines and rules for all the shelters and all the rescues to go by, we could all abide by them.

Q. Ms. Sheridan, you would agree that if an animal, let's say a cat, has some kind of infectious respiratory problem that they could infect other cats, they probably shouldn't be around other cats?

A. That didn't happen that way with cats there, unless you're going to keep a cat caged. And I'm not going to do that either. There's no point. There's twenty-six cats at my place that they did not take, and evidently it's because they weren't sick.

Q. And you also testified that you fancy yourself -- you don't like dogs being put down if they're suffering, so you let them live unnatural lives suffering free.

A. That is not what I said. I said the only time I

will put down a dog is if it was suffering.
Q. But you would allow a dog to live suffering, let's say, if it was covered in mange with scabs all over its body?
A. I knew that that dog was going to heal, and I know that those two puppies that were there had the Demodex. I knew what kind of mange it was. They had already been skin scraped and tested. The Pooh Bear, he does it. He gets better, and he goes back. You guys keep him for a couple of years, and you'll see.
Q. So it's just a coincidence that he's thriving now?
A. No, it's not a coincidence. Not at all. He has thrived with me on many occasions. He has been with me for four years.
Q. You don't think it had anything to do with having a clean living habitat and adequate medical care?
A. He had adequate everything that he needed at my place.

MR. MCLAIN: I have no further questions, Your Honor.

THE COURT: Mr. Toney, any redirect?

REDIRECT EXAMINATION

BY MR. TONEY:

Q. I understand, ma'am, that you had this residue of drugs in your pocket, the meth.

A. Uh-huh (affirmative).
Q. Did you know what it was?
A. No, I did not. I didn't even realize that that was in my pocket. I just picked up trash.
Q. Although you had the item in your pocket, did you intend to possess the methamphetamines?
A. Absolutely not.
Q. Okay. The trailer in the photos?
A. Yes, sir.
Q. Was that being used for dogs?
A. No. There was no animals in that mobile home.
Q. Okay. And that was an abandoned trailer?
A. Pretty much. I had pretty much abandoned it. It flooded four times, and on the fourth time I just let it go.
Q. All right.

MR. TONEY: That's all the questions I have of this witness.

THE COURT: All right. Anything further from this witness?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: All right. Thank you, ma'am. You can step down.

MR. TONEY: I call Dr. Moorhead. I'll have to go get him.

BOB MOORHEAD, DVM

BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

BY MR. TONEY:

Q. Dr. Moorhead, please state your name for the record.

A. Bob Moorhead.

Q. And how old are you, sir?

A. Sixty-four.

Q. And how long have you been a vet in South Carolina?

A. Forty years and about six months.

Q. And where did you go to school?

A. Well, not all of that was in South Carolina. About three years -- about a year and a half of that was in Tennessee.

Q. What kind of vet practice have you had?

A. Mixed practice. Private ---

Q. What does that mean?

A. Large and small animal practice. Clinical private practitioner for that whole forty years. That's all I've ever done.

Q. What kind of animals do you take care of?

A. Dogs, cats, cows, horses, pigs. All the farm animals.

Q. And where did you go to school?

A. University of Georgia.

Q. And how long does it take to become a vet?
A. I went to Clemson a little over two years and then Georgia four years.
Q. Six years?
A. Yeah.
Q. Do you have to do anything after that or ---
A. No. But I went to work for another practitioner for about a year and a half up in Tennessee.
Q. A year and a half practitioner? It's extremely, extremely competitive to become a vet, isn't it?
A. It was when I when I went in, yeah.
Q. How many vets were allowed in that year?
A. From South Carolina, I think there was about eight.
Q. Eight?
A. From South Carolina. Back then, yeah. Back then.
Q. You mean vets in ---
A. We have a deal with the University of Georgia, South Carolina does, since we don't have a vet school here. And Georgia took eight.
Q. How hard is it to become a vet compared with even being a medical doctor?
A. I don't know. I'm not qualified to say, I don't guess.
Q. Okay. And you've known Debra Sheridan?
A. Yeah. I've been her veterinarian for about four

years now, I guess.
Q. Okay. She's helped you in the clinic in that time?
A. Yes. Recently, the last year or two, she's been on part-time work for me.
Q. Okay. You have -- you let her work with you?
A. Yes.
Q. And how does she do on the job?
A. Fine.
Q. What kind of work does she do for you?
A. Assists me some in surgery and with clients. She's a very -- been a very compassionate person.
Q. Does she love these animals?
A. Oh, yeah.
Q. What's her motive in caring for these dogs?
MR. MCLAIN: Your Honor, there's no way he can answer Ms. Sheridan's motives.
THE COURT: Sustained.
Q. How does she -- based on what you've seen in her behavior, how does she care for these dogs?
A. She's very -- I'd say she's probably one of the most humane people I've ever met, compassionate people I've ever met. She even has gotten onto me a little bit sometimes when I seem to be a little rough.
Q. Really?
A. (Nodded head up and down in the affirmative.)

Q. Have you been to her place?
A. I have, several times.
Q. And the dogs seem -- how did the dogs seem, the dogs and cats?
A. They seemed to be like a lot of rescues I've been to. There are -- none of them are spotless or without some odors. And they're, you know, they're all -- it's just the nature of that business. They're all -- sometimes there's some messes, and sometimes there are some odors. And, like I said, I think that's just the nature of the business that I've observed during my forty years of practice. It seems to be in direct proportion of the -- how clean they are as to how much money you have to pay people to help you clean up.
Q. You've been in practice for forty years?
A. Forty years.
Q. How many animals have you examined in that forty years?
A. I couldn't even imagine to tell you. I couldn't even guess.
MR. TONEY: I move to introduce this doctor as an expert in veterinary medicine.
THE COURT: Any objection?
MR. MCLAIN: No, sir.
THE COURT: Okay. Dr. Moorhead would be

admitted as an expert in veterinary medicine without objection.

Q. Doctor, you've been to other rescues, you say?

A. I have.

Q. And how many rescues have you been to?

A. (No verbal response)

Q. Many?

A. Well, not a lot. There's not a lot around here. But one other one I have been to.

Q. Have you ever been to PAWS of Anderson?

A. I toured it one time.

Q. Is it true what the officers have testified, that PAWS does not put rabies tags on the dogs while they're in shelter? Is that true what the officers said?

A. I wouldn't know.

Q. Do you know if that's a hazard for the dogs to have the tags on them?

A. Well, it depends on what ---

Q. Is the tag on the dog -- is it a potential for -- any potential for getting snagged ---

A. Well, any kind of collar could be, yeah. I like to take them off when they're in cages, yeah.

Q. And that's -- you like to take them off, and that's for safety reasons?

A. Yeah.

Q. Okay. Did Debra give her dogs shots?
A. Yes.
Q. And vaccinations?
A. Yes.
Q. And did you actually fill out the forms?
A. I did or my assistant did.
Q. Okay. These have already been introduced. Are these forms that you filled out at different times, you or your office, regarding these dogs and cats? Vaccination forms?
A. Either at my office or on the premises where I was.
Q. You've been to her facility on occasion, her rescue?
A. Yeah. Mostly to do vaccines and things, yeah.
Q. And did you feel like she was taking adequate care of the dogs at the time?
A. Yes.
Q. And the cats?
A. Yeah. Just like I said, there's always going to be some mess and some odor around those kind of facilities, I think. But, yeah, it's the best you can do.

MR. TONEY: That's all the questions I have for this witness.

THE COURT: All right.

Mr. McLain?

CROSS-EXAMINATION

(WHEREUPON, court stood at recess for a short break.)

MR. TONEY: I've still got to go through some of this, sir.

THE COURT: Okay.

MR. TONEY: I'm making good progress.

(WHEREUPON, court stood at ease.)

MR. TONEY: Your Honor, I have no problems with the jury form.

THE COURT: Any objection?

MR. TONEY: But I do have a little motion when I'm finished.

THE COURT: Okay.

All right. First of all, Mr. McLain, any objection to the proposed charges or the verdict form?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Okay. So we have no objections for either side as to the verdict form or the charges?

MR. MCLAIN: Correct.

THE COURT: Okay.

All right. Mr. Toney, let me hear your motion.

MR. TONEY: Well, I object to the rabies charges going to the jury. The reasons are as follows. The rabies statute -- I've got notes on it around here somewhere. I can't find them, but I remember what it

was. It doesn't specify that she has to keep certificates on her person. It's enough for the vet to keep those certificates. There's enough testimony that it's a common practice for rescues and similar facilities to not have the tags on them. As a matter of fact, the State testified that they did not keep rabies tags on their own dogs. It would be a real bad thing, almost an offensive thing, if the jury was to find her guilty of the rabies tags on the basis of the tags not being on the dogs when the State has come into court and said, "We don't keep them on our own dogs." That would be very unfair.

It would be -- I just think it would be grossly unfair and an unequal application of the law. It's a violation of equal protection. It's a selective enforcement. And mind you, most selective enforcement arguments are made with the State denying that there's an issue of selective enforcement.

In this case, the State actually came into court and said, "Yeah, we don't ever put them on there." There's no question that there's thousands and thousands and thousands of dogs that go through the Anderson County Humane Society and PAWS. There's no issue -- and the solicitor will agree with this, I believe -- that they absolutely completely testified they don't put the tags

on the dogs. So unless they intend on prosecuting Anderson County, it's just my belief it's an injustice to expect her to have tags on her dogs too.

THE COURT: All right.

Mr. McLain?

MR. MCLAIN: Your Honor, PAWS is a county-run professional humane society with a full-time veterinarian on staff. I think to go out on a limb and say Ms. Sheridan's, quote unquote, rescue is on the same level as that is way out there. I also think with PAWS every single dog is caged all the time. But Ms. Sheridan admitted herself that most of her dogs run around and she gives them free reign.

THE COURT: Now, this is a factual question. This is a jury question. I'm going to deny your motion, Mr. Toney.

MR. TONEY: Thank you, sir.

THE COURT: All right. We will -- lunch for the jury is not going to be here for a while, so we will proceed into closing arguments.

So Mr. McLain ...

MR. MCLAIN: Your Honor, I believe I have the right to last closing, last argument.

THE COURT: Right. You would open on the law and then you give closing. And Mr. Toney, you would be

in-between. Since Mr. McLain has the burden of proof, he gets the last argument. All right.

Mr. Bailiff?

MR. MCLAIN: Your Honor, may we approach?

THE COURT: Yes, sir.

(WHEREUPON, a bench conference was held off the record after which the jury entered the open court at approximately 11:55 a.m.)

THE COURT: All right. Ladies and gentlemen, we have reached the point in the trial where the attorneys will give you their closing arguments.

Mr. McLain?

CLOSING ARGUMENT

BY MR. MCLAIN:

Ladies and gentlemen, I appreciate your time this week. I know it's been a long week starting Monday and obviously finishing up on Friday around lunchtime. We've listened to all the evidence, and the Judge is going to give you an instruction on the law soon. I'm basically telling you what I have to prove in order to convict Ms. Sheridan of the charges, the crimes, she was charged with.

First and foremost, possession of methamphetamine requires that someone be in possession of methamphetamine. It doesn't have a minimum weight

requirement. It simply requires someone be in possession of methamphetamine.

You've heard a lot of language about what constitutes ill treatment. Again, the Judge is going to instruct everything -- instruct you on a broad basis everything. But specifically -- I know you've heard this term -- if you deprive an animal of necessary sustenance and shelter, that that constitutes ill treatment.

Specifically, sustenance can be conceived as adequate water provided with constant access to a supply of clean, fresh, potable water in a suitable manner.

And finally, a further thing she's been charged with is the rabies control violation. The rabies control violation simply states that a dog owner must keep -- the rabies tag must be attached to the dog at all times. It doesn't give leeway. It simply says the dog must wear the tag at all times. Those three words, period. That's it.

Like I said, the Judge is going to instruct you further. Before you get the evidence and deliberate, I just ask that you listen to the Judge, apply the evidence you've heard as you deliberate.

THE COURT: Mr. Toney?

CLOSING ARGUMENT

BY MR. TONEY:

Ladies and gentlemen, thank you very much for listening. It's taken a lot of time. I know you had work to do and other important things. This is a great service to the County and I believe also to my client.

The State has the burden of proof in this case. They have to come forward and prove every element of their case. And if they don't -- the Judge is going to instruct you if they don't prove their case beyond a reasonable doubt, then you've got to find her not guilty. The Judge is going to give you detailed instructions on what that means. But essentially that's what he's going to talk to you about is one of those things.

In this case, the State came here with all these charges. And they said, we have these rabies charges, for instance. And they said, well, she didn't have tags on the dogs. Now, their own people came in, every one of them, and said these dogs in their own facility do not have rabies tags on them. That they did not strictly follow the law in that instance. But they had certificates on file. And that's exactly what my client had. She had certificates with the vet, and the statute does not require that you have these certificates on your person. She just has to have documentation. She had that. She didn't have tags because if she did, the tags could get caught up in the fence and possibly be a

choking hazard. She had all these dogs running around.

I want to say this right off the bat. There's no question in my mind, there's no doubt whatsoever, reasonable or otherwise, beyond any shadow of doubt those charges, in my opinion, should be thrown out, the rabies charges.

The State -- some of the State people testified that in any of the rescues they've been in, they've never seen tags on the dogs. Rabies tags. And that they have not had rabies tags on a single one of their dogs ever. So even now if you went to PAWS -- based on their own testimony, if you went down to Anderson County, there would not be a single rabies tag on a single dog. If you go next week, there won't be a rabies tag on a dog. If you go ten years from now, there won't be a rabies tag on a dog for infinity. Never, not one time ever. And the reason for that is it's just unsafe. You can't have all these fences and all these dogs and have all these dogs tagged because they're going to get caught up in the fence.

My client brought in rabies certificates. These were all different handwritings based on different pens. You could just tell these were done simultaneously with the vaccinations by Dr. Moorhead or his staff. She actually, as soon as she got out of jail, brought me

these certificates. And I took them, and I did a certificate of service, and I filed them with the magistrate's court. And they're even clocked in. You can see it right here in the corner where we filed it with the court so the court would have immediate notice within a few hours of her getting out of jail. I said, "Go get the rabies certificates," and were filed with court right away. We did give it to them.

Really, in my opinion, they shouldn't have ever gone to trial on those charges of rabies certificates. They should have just thrown them out right away. They shouldn't have even brought this in front of you.

The next set of charges that you will not hear about, they have already been dismissed by the Court. All of these dog IDs were thrown out -- that was done yesterday -- because the vet testified there was necessary sustenance and shelter on every one of these animals. My question is, if there's necessary sustenance and shelter on all these animals and the dogs seemed like they were would go around different dogs -- they did have the cages -- I think it's clear that there was necessary sustenance and shelter on all these animals.

In this case, we went through the report which y'all are going to have a chance to go over at great detail. Of the charges that were not dismissed yesterday are

these charges. The ones that were on this list were ones that there were no questions about. There were no issues. There were some where the vet actually said there was necessary sustenance and shelter, but there was some sort of skin issue or something. We put these on a list. These are the dogs that these charges haven't been dismissed yet. And it says, "appears normal," on each one of these charges, on each one of these reports. I want you to understand -- and I think you already do. But respectfully, I feel like I have a duty to remind you that the dogs on this list where it says "appears normal" have been examined by the State's own humane society on three or maybe four, on most occasions four separate occasions, by the vet and by the staff. And on each occasion they said this dog is fine. In my opinion, all of these need to be thrown out. And I would ask that you do that.

There's some other animals on the list, and we have talked about these other animals. It gets hard for me to remember all the different things about each of these dogs. But I will say this. Some of them are -- there's one that's a pit bull. And the only problem they listed was it was unsociable. And it's clear that those dogs were all very sociable. I've had dogs before. I don't have any right now. But I've never had a dog that

wouldn't bark. I mean, to me, that's the jobs of -- the dog's job. And that's half the reason you get a dog. And these dogs were apparently very nice and very sociable. They acted like dogs that had been cared for and loved and treated very well. You don't have to know what's going on.

You know, when you see a child go to school, you see one child and that child's misbehaving. And you see that child is just acting out. And then you see another child. That child is just sitting at the table. He's doing his homework, and he's minding the teacher. You don't necessarily have to go into how that child was raised. You can just look at that child and you can say, hey, that child's been well raised. That's a well-mannered child. That's a good boy. That's a good girl. That's a girl listening to the teacher. And you just know.

And you can look at these dogs here and how they acted and how well they behaved and how they weren't hostile. They were very sociable. And you can just tell that these are good dogs, good cats, who weren't afraid of people. These dogs have been well cared for and loved.

Debra Sheridan is an amazing woman. There's nobody like her. Some people would say that maybe she's a

fanatic with these dogs. Some people would say, you know, she's just a loving kind woman. But I can't imagine spending fourteen years rescuing these animals and placing over five thousand dogs and the level of care and attention she's given these animals. It's extraordinary. It's beyond the pale. It's beyond what's reasonable. It's beyond any reasonable behavior.

She has gone to other countries. When she adopts dogs, when she puts a dog in the home, she checks the home out. She has driven across the country on numerous occasions. She's driven to New York State, Canada, out West, everywhere, just to make sure the dog's going into a nice home. There's no limits she won't go to for these dogs.

A lot of these dogs, when they showed the picture, this dog with no hair, you know, it's like the old joke about, you know, missing dog -- you know, "Lost dog, missing one front leg, only has one eye, no ears and half his tail whacked off. Answers to the name of Lucky." These are dogs that nobody in their right mind would want to live and want to help, but she wants to help them. I wouldn't do it, and I'm a little more -- I'm not like that. I'm just not. I would probably put these dogs down, some of them. But she wants them to live. She tries to keep them alive.

One day all of us, we're not all going to be sitting here walking around. Some of us are going to be in a hospice or somewhere, and someone's going to have to make a decision about us. And at that time we hope that someone will say let's help him out. Let's keep him alive. And there will be someone there. There'll be a nurse or a doctor or someone that will say, you know, just let her die. It's their time. Blah, blah, blah, blah, blah. And the person -- and you may say, well, I want to live.

Well, she wants to give them the chance to live. Some of these dogs, there's no question, she got them off the euthanasia list at Anderson County. These dogs were on their own little version of death row. And she pulled them out of there and adopted them and then tried to find homes. She'd place them. Some of them was mangy and had hair problems, whatever the heck was going on, you know. She testified one lady she gave -- from New York drove down, gave them the dog. Rich New York lady. Spent ten thousand dollars in medicine. And then the dog, you know, had to come back because we knew that the dog had hair problems. We didn't know it was this bad. And so she went and got the dog back, tried to adopt it out again. Some of these dogs are unadoptable.

We've all known people like this. I mean, they're

not normal necessarily, but they are around. There's people that if they see a stray, they're going to take it in. If they see someone that needs some help, they're going to go help them. Whether or not they have problems that most people would say, I ain't going to mess with it. But there's people out there that will just -- they have a heart, and they will do it.

And that's what Debra is. She loves these animals. There's been no testimony that she ever got any compensation for any of this. There's been no testimony that she ever got paid.

And I have to say this. There's no reason -- I mean, you know, this is not -- I don't know if you've seen the latest Bond movie, Spectre. She's not, you know, James Bond's girlfriend. She's not flitting around in a Maserati and wearing a mink coat and flying by private jet. She's living in Easley or wherever it is, and she's got this place. And it's sort of average, sort of rough. And she's spending all this time. And there's no testimony that she ever got paid for any of this, anything like that.

So why would anybody do this? And how could you do it for fourteen years if you didn't love these animals? And it's clear that this is what she loves and this is what she does. And she's given her life to these

animals. She has no children. These dogs are her babies. She has no husband. She's basically spent all of her time with these animals.

I would ask -- as to this meth charge, she was very honest. She could have easily taken care of this before now, but she came to court. She has no prior drug record. She said she went to pick some stuff up off -- there's been people throw drugs off the side of the road. She has stated she lives in Slabtown. The detectives have told her seven out of ten in that area have some sort of drug problem. The State let that in. That testimony is uncontradicted. They have not disputed it.

In this case, she's been very honest. She came in. She said, listen, you know, people -- it's a straightaway. People throw stuff over the fence. Maybe a car gets behind them. I think she meant a police car. I would ask that you throw that charge out.

The State has the burden of proof in this case. There's been a lot of testimony in this case. I have done my absolute best to try to put this information in manageable form. I am the one, me, me, me -- not the solicitor -- who has gone through this to try to put this in categories, to try to put this in information that can be used. I had to set this up and let you know why I'm telling you this. If you can't remember which

information goes with which dog, and if you get confused on some of these dogs when you're in the jury room, and you say, I can't remember what the vet said, I can't remember, just remember I did my best to put this in manageable form for you.

The State has the burden of proof. If they have failed to put this case in a format where you can analyze it and analyze the testimony -- I will respectfully submit to you if you get back in the jury room and you say, what did that vet say about this particular dog -- one says one thing and one says another and you can't remember -- I will submit if you can't remember and you can't make a good decision, if they've failed to give you the information in usable form, then it's acceptable for you to say, I don't know. I'm sorry they didn't give it in a good format, that they didn't put it out in a format I could remember. I'm going to find not her guilty because they didn't give me the information in a form I could use.

And I have an iPad, the Air II. And let me tell you why Apple -- which is a one-trillion-dollar company, the first one-trillion-dollar company in the world history of this planet. Let me tell you why Apple is a one-trillion-dollar company. Their product is not necessarily tremendously different from other computers.

They have the same computer capacity. But what happens is you open up the box, and the box springs open and everything is right there and you can use it and it's easy. Information has to be given to you in a format that you can use, and Apple does that. It's called look and feel. And they're the ones that pioneered all these little icons like wastebaskets on your computers where you can drop empty data into it. It's easy to use.

If I was a salesman and I came to you and I was trying to explain how something worked and tried to sell you some kind of product and that information was in such a gobbledegook form -- let's say I was trying to sell you on something and I was maybe not very good at explaining it and I was an engineer, for instance. Engineers say this -- I don't know if any of you are engineers. But engineers are notorious for getting lost in the technicalities. And let's just say you're not technical, and you had to buy that product. And this engineer said well, you know, this has three-fourths specs, and it has, you know, eighteen-inch long, blah, blah, blah, blah, blah. And you just listen politely and you went, I don't know what he said. A person, you, yourself, would say, you know what. I'm sure that guy is smart. I'm sure he knows exactly what he's doing, but I don't want him to work on my stuff. I don't know what the hell he just

said. I'm not buying it because he didn't explain it. And that's one of the reasons we have salesmen. I don't know if any of you have had sales jobs. Their job is to sell you a car or vacuum cleaner, just explain the features in a way that you can understand.

There's a lot of testimony here. There's a lot of dogs, a lot of numbers. They really haven't allowed you to put it in a format where you can say this pertains to this dog and this pertains to this dog. I don't really know. And I would ask that you -- if you don't know, don't take a chance. Don't just say, well, I'm not really sure about this dog. I think this is what it is, so I'm going to find guilty. If you get back there and you say, I don't know -- and the Judge will instruct you on reasonable doubt. But if you say I don't know, there's no question that's reasonable doubt because you just don't know. If you can't agree on what was said or you're confused, then unfortunately, the State has failed to meet their burden of proof.

So I thank you. I could go on and on, but I think I've made my points. I think everybody's been up here long enough. You've heard enough. I just ask that you take it all into account and apply the laws to the facts.

THE COURT: All right.

Mr. McLain?

CLOSING ARGUMENT

BY MR. MCLAIN:

Ladies and gentlemen, as I said before, I do appreciate your time this week. I know it's been a long kind of confusing week.

As Mr. Toney just stated, and as the Judge will explain in further detail, it is my burden to prove to you beyond a reasonable doubt that Ms. Sheridan is guilty of the charges -- of the crimes she's been charged with. And more specifically -- I'm going to try to keep this organized and go through these one by one.

First and foremost, she was charged with possession of methamphetamine because she was found in possession of methamphetamine. What I have to prove in order for you to find her guilty is that she had both the power and intent to control the methamphetamine. It was found in her pocket. If you put something in your pocket, you have not only the power to control it, you have the intent to control it. And on top of that, you heard from her mouth herself, "I was in possession of that methamphetamine."

And, of course, I have to prove that it was, in fact, meth. You heard from the forensic chemist, Ms. Lanford, who had testified that it was methamphetamine at point zero six grams. I don't believe the Defense argued

what the substance actually was.

I think there was a couple of things to note in regards to this theory that I just found some drugs and I put them in my pocket because that's what I normally do. First off, she wasn't just found with meth; she was found with a snorting straw with residue in it.

Now, Mr. Toney would have you believe -- Mr. Toney would have you believe that -- you know, he's made a big deal about there's hardly any weight here. There's hardly any weight here. I don't know about you, but I'm pretty sure it would be hard to throw a tiny little bag with point zero six grams while driving by someone's house and it somehow go over the fence and land in her driveway. Not only that, the straw came with it and landed perfectly right next to it in her driveway. As I said before, Ms. Sheridan admitted herself that she possessed this methamphetamine. That's proof enough.

Regarding the ill treatment of animals and the rabies charges, I think the old saying "a picture is worth a thousand words" applies here more so than in other cases. You've seen a lot of pictures, pictures of some of the dogs, some of the conditions. And obviously, as Mr. Toney pointed out, the veterinarian made a point to say that not all of the dogs had been deprived of necessary sustenance and shelter. And those warrants

have been taken care of. Mr. Toney is glad when the vet, you know, agrees with him on those charges. On the other charges, he doesn't want to use her testimony though because it disagrees with his position.

Concerning the rabies charge, the law is clear. It says a dog must wear it all the time. Ms. Sheridan admitted her dogs were not wearing the rabies tags. I know Mr. Toney says -- made a big deal about the safety of the dogs and the choking hazard. You heard testimony from the vet that this dog is in an extremely bad choking hazard situation currently. Clearly, Ms. Sheridan is not concerned at all with the dog having a choking hazard. I'm pretty sure a chain with a hole in a crate -- a hole in the fence that it can crawl through is a little bit more of a choking hazard than the dog wearing a rabies tag.

Secondly, you know, this contention that, well, because PAWS, a sanitary, clean, professionally run humane society with a full-time support staff and a full-time vet staff is somehow on the same level of this so-called rescue operation Ms. Sheridan is running. I just don't think that argument has teeth.

Now, we've heard a lot about what is the standard of care. What is the standard of care for animals? From the sounds of it, Mr. Toney would have the standard of

care so low for animals we wouldn't need animal control officers because at the end of the day, it doesn't really matter how you treat your animals. You can let them lay around in piles of their own feces, and that's perfectly acceptable.

You know, Ms. Sheridan testified that she's gone to forty-eight different states to personally inspect peoples' property. It's unfortunate that until March 18th nobody was inspecting her property and her dogs that she was hoarding at her property.

Ms. Sheridan herself admitted to you that just a year before, a hundred and nineteen other dogs were taken. And you've heard a lot about how she saves dogs, that she takes in the dogs that no one else wants. No one else wants to help these dogs.

You heard testimony from the vet that's treating this dog currently, who clearly wants to help this dog, that this dog is thriving now. This dog is in a sanitary, clean situation now. It's receiving regular, adequate medical care, and it's thriving. You also heard testimony because her eye condition went untouched for so long, it caused permanent damage. Had that not gone untouched, had that dog received adequate medical care prior, she wouldn't be blind today.

You've heard a lot about there's no book to go by.

There's no book, you know, to tell me how to take care of dogs. I think most people would agree it's unacceptable to allow a dog to roam around in these type of conditions. I don't think most people would need a book to tell them that it's not okay for dogs to be in an area that is absolutely covered with feces, smells so bad you can't even walk in the door without a mask on.

This is another one of the dogs that Ms. Sheridan claims no one wants to help. No one ever wants to help these dogs. According to her, this dog was on its deathbed. You heard testimony that not only is this dog thriving now that it's getting adequate medical care in a clean facility, the issues it had were not end-of-life issues.

Ladies and gentlemen, the Judge will explain to you that depriving an animal of necessary sustenance and shelter is considered ill treatment of animals. Sustenance is defined as adequate food, adequate water.

You heard testimony that the fenced area one didn't have any water bowls except that yellow bucket with fecal matter in the water. You've seen the pictures of the conditions these dogs were living in. You don't need a book to tell you that this is not okay. You don't need a book to tell you that no living creature should have to endure what that dog's enduring right there. You don't

need a book to tell you that no creature that lives and breathes air should have to live in these conditions that they didn't want to be in the first place.

Ladies and gentlemen, I asked you at the beginning of the week if you'll look at the evidence and listen to the testimony and use your common sense. Your common sense will tell you that this is an unsanitary, unhealthy, absolutely unacceptable situation for any living creature to be in. And I think if you sit down and you really think it out and use your common sense, you'll have no choice but to find the defendant guilty of all charges.

Thank you.

CHARGE

BY THE COURT:

All right. Ladies and gentlemen, we have come to the point in the trial where I instruct you on the law. My instructions will be somewhat lengthy. They will be in three parts: first, the instructions on the general rules that define and control the jury's duty; secondly, the instructions that state the rules of law you must apply, what the State must prove to prove its case; third, there'll be some rules for your deliberations.

The general rules begin with your duties as jurors. It is your duty to find the facts from all the evidence

in the case. To those facts, you must apply the law as I give it to you. You shall not be concerned with what the law should be, but what it is. And you must not be influenced by any personal likes or dislikes, opinions, prejudices, or undue sympathy. That means you must decide the case solely on the evidence before you in accordance with the law, the very thing you took an oath promising to do at the beginning of the trial.

It is your responsibility, and yours alone, to determine the facts of this case. I would, therefore, charge you that if during the course of this trial or during this charge you have been given or left with the impression or feeling that I have a personal feeling about the facts of this case or that I favor one side or the other, I would specifically instruct you to disregard that impression. Under our Constitution, I am not allowed to have an opinion about the facts of the case. You should not be influenced by any objections or the Court's ruling on them.

You, and you alone, are the judges of the facts. You determine the facts by evaluating and weighing the evidence that you've heard during the trial.

Well, what is evidence? Evidence is the sworn testimony from the witnesses and any exhibits that have been entered into evidence. The statements by the

attorneys are not evidence. What they have said in opening statements, closing arguments, and at other times is intended to help you interpret the evidence. But it is not evidence.

There are two types of evidence which are generally presented during a trial, direct evidence and circumstantial evidence. Direct evidence directly proves the existence of a fact and does not require deduction. Circumstantial evidence is proof of a chain of facts and circumstances indicating the existence of a fact.

Crimes may be proven by circumstantial evidence. The law makes no distinction between the weight or value to be given to either direct or circumstantial evidence. However, to the extent the State relies on circumstantial evidence, all the circumstances must be consistent with each other and when taken together point conclusively to the guilt of the accused beyond a reasonable doubt. If the circumstances merely portray the defendant's behavior as suspicious, the proof has failed.

The State has the burden of proving the defendant guilty beyond a reasonable doubt. The burden rests with the State regardless of whether the State relies on direct evidence, circumstantial evidence, or some combination of the two.

What is a reasonable doubt in the law? A reasonable

doubt is the kind of doubt that would cause a reasonable person to hesitate to act.

Some of you may have served as jurors in civil cases where you were told that it is only necessary to prove that a fact is more likely true than not true, such as by the greater weight or preponderance of the evidence.

In criminal cases, the State's proof must be more powerful than that. It must be beyond a reasonable doubt. Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant's guilt.

There are very few things in this world that we know with absolutely certainty. And in criminal cases, the law does not require proof that overcomes every possible doubt. If, based on your consideration of the evidence, you are firmly convinced that the defendant is guilty of the crimes charged, you must find the defendant guilty. If, on the other hand, you think that there is a real possibility that the defendant is not guilty, then you must give the defendant the benefit of the doubt and find her not guilty.

A reasonable doubt may arise from the evidence or from a lack of evidence. The defendant is entitled to every reasonable doubt that may arise in the case. If upon any issue a fact essential to a conviction and a verdict of guilty of an offense, if you have any

reasonable doubt as to how that issue should be resolved, it is your duty to resolve that issue in favor of the defendant.

Suspicion, however strong, is not enough to sustain a conviction. The evidence presented by the State must be substantial evidence that tends to prove the guilt of the defendant beyond a reasonable doubt.

As judges of the facts, you are the sole judges of the credibility, that is the believability, of the witnesses who have testified in this case. In determining their credibility you may take into consideration many things such as the appearance and manner of a witness on the stand, sometimes referred to as the demeanor of the witness. Was the witness able to see, hear or know the things about which the witness testified? How well was the witness able to recall and describe those things? Did the witness have a cause or reason to be biased and prejudiced in favor of the testimony he or she gave? How reasonable was the witness' testimony considered in the light of the evidence in the case? Was the witness' testimony contradicted by what the witness had said or done in another time or by the testimony of other witnesses or by other evidence? These are some of the factors that you may consider in deciding whether to believe testimony.

As jurors, you have the right to believe all of the testimony of a witness or none of the testimony of a witness. You have the right to believe a portion of the testimony of a witness and discard the rest. You may believe the testimony of one witness over the many or the many over the one.

Most certainly, you do not determine the matter of credibility or believability by simply counting up the number of witnesses who may have testified on behalf of the parties in this case. Your sole objective is to find the truth. It does not matter whether the truth comes from a witness for the State or a witness for the defendant.

Ladies and gentlemen, normally a person cannot give opinion testimony. Normally, a witness must testify to what they either saw, heard, sensed by smell or something of that nature. However, there is an exception when someone is qualified as an expert because of education or experience. They are permitted to give an opinion in certain areas if the Court qualifies them as an expert in that area.

You heard from witnesses qualified as expert witnesses. This does not mean that you are required to accept their opinion. Like any other witness, you may place whatever weight on that person's testimony that

you, as the judge of the facts, deem appropriate.

The defendant has pled not guilty to these indictments, and that plea puts the burden on the State to prove the defendant guilty. A person charged with committing a criminal offense is never required to prove himself innocent. I charge you that it is an important rule of the law that a defendant in a criminal trial, no matter what the seriousness of the charge may be, will always be presumed to be innocent of that crime for which the indictment was issued unless guilt has been proven by evidence satisfying you of that guilt beyond a reasonable doubt.

The presumption of innocence does not end when you begin your deliberations, but it accompanies the defendant throughout the trial until you reach a verdict of guilt based on evidence satisfying you of that guilt beyond a reasonable doubt.

The presumption of innocence is like a robe of righteousness placed about the shoulders of the defendant which remains with the defendant until it has been stripped from the defendant by evidence satisfying you of the defendant's guilt beyond a reasonable doubt.

The presumption of innocence is not mere legal theory. It's not just a legal phrase. It is a substantial right to which every defendant is entitled

unless you, the jury, are satisfied from the evidence of the defendant's guilt beyond a reasonable doubt.

In order to establish criminal liability, criminal intent is required. For example, the mental state required to be proven by the State for a particular crime may be purpose, intent, knowledge, recklessness, or criminal negligence. Criminal intent must be proven by the State beyond a reasonable doubt.

Criminal intent is always a matter that must be determined by the jury from the circumstances surrounding the situation. There's no way to prove intent to a mathematical certainty. There's no way medical science can dissect a person's brain and determine what that person had in mind. So the law says that criminal intent may be inferred from the circumstances shown to have existed. This is how you make a determination of whether or not the element requiring intent was present.

It is not necessary to establish intent by direct and positive evidence, but intent may be established by inference in the same way as any other fact, by taking into consideration the acts of the parties and all the facts and circumstances of the case.

Criminal intent is a mental state, a conscious wrongdoing. It is up to you to determine what the defendant intended to do based on the circumstances shown

to have existed.

Criminal intent can arise from an action or a failure to act. It may arise from negligence, recklessness, or an indifference to duty or to consequences that is considered by the law to be the equivalent of criminal intent.

The indictments in this case charge the defendant with possession of methamphetamine, rabies control chapter violation, and ill treatment of animals. And under the last two indictments, there are multiple counts.

I remind you that the fact that the defendant was arrested, charged and indicted in this case is not evidence. It cannot be considered by you as evidence of guilt in this case nor does it create any presumption of guilt. These documents are simply the formal written instruments which contain the charges made against the defendant. They are the formal documents by which the cases were brought to court.

Now, the defendant has been charged with ill treatment of animals. It is unlawful for a person to knowingly or intentionally overrode, overdrive, overwork or ill treat an animal, deprive an animal of necessary sustenance or shelter, inflict unnecessary pain or suffering upon an animal or by omission or commission

knowingly or intentionally cause these acts to be done.

Sustenance means adequate food provided at suitable intervals of quantities of wholesome food stuffs suitable for the species and age sufficient to maintain a reasonable level of nutrition to allow for proper growth and weight and adequate water provided with constant access to a supply of clean, fresh and potable water provided in a suitable manner for the species. Shelter means shelter that reasonably may be expected to protect the animal from physical suffering or impairment of health due to exposure to the elements or adverse weather.

The defendant has also been charged with rabies control chapter violation. A pet owner must have his or her pet inoculated against rabies at a frequency to provide continuous protection of the pet from rabies using a vaccine approved by the South Carolina Department of Health and Environmental Control and licensed by the U.S. Department of Agriculture. The rabies inoculation for pets must be administered by a licensed veterinarian or someone under a licensed veterinarian's direct supervision.

Evidence of rabies inoculation is a certificate signed by a licensed veterinarian and a metal license tag. The metal license tag at all times must be attached

to a collar or harness worn by the pet for which the certificate and tag have been issued. Inoculation against rabies means the injection of an antirabic vaccine and approved by DHEC and the U.S. Department of Agriculture.

A licensed veterinarian means a person licensed by law to practice veterinary medicine in the state. Owner means any person who has the right of property in a pet, keeps or harbors a pet or who has in his or her care or acts as its custodian or permits a pet to remain on or about any premises occupied by him or her.

The last charge, the defendant is charged with possession of methamphetamine. The State must prove beyond a reasonable doubt that the defendant knowingly or intentionally possessed methamphetamine. Knowingly means with knowledge, consciously, not accidentally. Intentionally means willfully, intending the result which actually occurs, not accidentally or involuntarily. Intent may be shown by the acts and conduct of the defendant and other circumstances from which you may naturally and reasonably infer intent.

Possession of methamphetamine is a crime unless the methamphetamine was obtained directly from or through a valid prescription or order of a practitioner acting in the course of professional practice. A practitioner is a

physician, dentist, veterinarian, podiatrist, scientific investigator, pharmacy, hospital or other person or institution licensed, registered or otherwise permitted to distribute, dispense, conduct research with respect to or administer a controlled substance in the course of professional practice and research in this state.

Ladies and gentlemen, we're almost to the point where I send you to the jury room for your deliberations to begin. This has been a long instruction on the law. But I leave you with some final thoughts. You were chosen as jurors because both sides believed that you could be fair and impartial in deciding this case. I instruct you to make use of your life experiences, your good common sense and your sense of logic and reason in evaluating the evidence in this case.

You are not partisans or advocates for either side. You have no friends to reward nor any enemies to punish. You are the judges of the facts. Your sole interest is to find the truth from the evidence presented in this case.

Be courteous with one another. Listen to the views of your fellow jurors. Take the amount of time necessary for you to thoroughly evaluate the evidence. This case is important to both sides, and this is their only day in court.

Now, Mr. Foreman, I'm going to go over the verdict form with you. Since there are a number of counts under the indictments, this is a long verdict form. What I've had my law clerk do is break the indictments down based on the number.

And the first is possession of methamphetamine. And you will have two choices. It says, "We, the jury, unanimously find on indictment number 2015-GS-04-01175 that the defendant, Debra Lynne Sheridan, is ..." And you have two choices, not guilty or guilty.

You go to the next page. Now, the rabies control violation, indictment number 1176, you have all these counts. Now, there's two lines on the verdict form that are the same as the first indictment, not guilty or guilty. And you check the appropriate box. Now, you would note that this indictment has fifty-four counts.

And you go to the final indictment, ill treatment of animals, which is 1177. You have the same choices, not guilty or guilty. And you have to check the appropriate box on each count.

What I've had my law clerk do also is put the animal number under each count to make it easier for you, as the jury, to keep track of which count you're dealing with.

Your verdict has to be unanimous. All of you must agree. I'm going to send the verdict form back along

with the exhibits. Now, I'm going to send you to the jury room now, but you cannot begin your deliberations until you receive the verdict form and the exhibits and the bailiff instructs you that I've said it's okay for you to begin deliberating.

So Mr. Bailiff, would you take the jury to the jury room?

(WHEREUPON, the jury exited the open court at approximately 12:46 p.m.)

THE COURT: All right. Any exceptions to the charges from the State?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Any exceptions to the charges from the defendant?

MR. TONEY: No, Your Honor.

THE COURT: Okay. Would both attorneys come forward, count the exhibits, make sure all the exhibits are there?

(WHEREUPON, counsel reviewed the exhibits.)

MR. TONEY: Looks like they're all there.

THE COURT: Those are all the exhibits?

MR. TONEY: Yes, sir.

THE COURT: All right. The attorneys have reviewed the exhibits. All appear to be there.

Mr. Bailiff, would you take the exhibits and the

verdict form to the jury room and instruct them to begin their deliberations? Bring the alternate back out here.

THE BAILIFF: Yes, sir.

(WHEREUPON, the exhibits admitted into evidence and verdict form were delivered to the jury to begin deliberations at approximately 12:51 p.m. after which the alternate juror entered the courtroom.)

THE COURT: Since you were the alternate ---

THE JUROR: Yes.

THE COURT: --- and all of your fellow jurors made it to the end of the trial, you have the unfortunate distinction of having to sit through the whole trial, but you don't get to participate in the decision making. But there is a silver lining. And that is your clerk of court has ordered you lunch, and they're going to feed you before you go.

You make sure she gets her lunch.

If you -- after you eat your lunch, if you want to stay and see how it turns out, you're welcome to do that. But after you eat your lunch, if you want to go home, you're free to do so.

THE JUROR: Okay.

THE COURT: Thank you for your service.

THE JUROR: Thank you.

THE COURT: All right. We'll go into recess.

(WHEREUPON, court stood in recess awaiting the verdicts of the jury.)

THE COURT: All right. Counsel, we have a question from the jury which states, "We want to know if we can please rehear the rabies laws." So I am going to reread the charge on the statute § 47-5-200, the rabies control chapter violation.

So let's make this a Court exhibit.

(WHEREUPON, Court's Exhibit Number 2 was marked for identification only.)

THE COURT: Bailiff, if you'd get our jury.

(WHEREUPON, the jury entered the open court at approximately 2:01 p.m.)

THE COURT: All right. Ladies and gentlemen, I am in receipt of your question about you wanting to rehear the law regarding rabies. So I will reread the statute.

A pet owner must have his or her pet inoculated against rabies at a frequency to provide continuous protection of the pet from rabies using a vaccine approved by the South Carolina Department of Health and Environmental Control and licensed by the U.S. Department of Agriculture. The rabies inoculation for pets must be administered by a licensed veterinarian or someone under a licensed veterinarian's direct supervision. Evidence

of rabies inoculation is a certificate signed by a licensed veterinarian and a metal license tag. The metal license tag at all times must be attached to a collar or harness worn by the pet for which the certificate and tag have been issued.

Inoculation against rabies means the injection of an antirabic vaccine as approved by DHEC and the U.S. Department of Agriculture. A licensed veterinarian means a person licensed by law to practice veterinary medicine in this state. Owner means any person who has a right of property in a pet, keeps or harbors a pet or who has it in his or her care or acts as its custodian or permits a pet to remain on or about any premises occupied by him or her.

That is the statute pertaining to rabies control.

All right. Ladies and gentlemen, I'm going to ask you to return to the jury room and resume your deliberations.

(WHEREUPON, the jury exited the open court at approximately 2:03 p.m.)

THE COURT: All right. Any exceptions from the State?

MR. MCLAIN: No, sir, Your Honor.

THE COURT: Any exceptions from the Defense?

MR. TONEY: None, Your Honor.

THE COURT: All right. We will go back into recess.

(WHEREUPON, court stood at recess awaiting the verdicts of the jury.)

THE COURT: Okay. It's my understanding that the jury has reached a verdict. Anything before we bring the jury back in, from the State?

MR. TONEY: May I approach?

(WHEREUPON, a bench conference was held off the record.)

THE COURT: All right. Mr. Bailiff, would you get our jury for us, please, sir?

THE BAILIFF: Yes, sir.

(WHEREUPON, the jury entered the open court at approximately 2:22 p.m.)

THE COURT: All right. Mr. Foreman, has the jury reached a verdict?

MR. FOREMAN: We have.

THE COURT: Okay. Would you hand that verdict to the bailiff, please, sir?

(WHEREUPON, the verdict form was handed up to the Court.)

THE COURT: All right. Mr. Clerk, would you publish the verdict?

THE CLERK: If it pleases the Court, Your

Honor.

This is the State of South Carolina, County of Anderson, in the Court of General Sessions under indictment number 2015-GS-04-01175, 2015-GS-04-01176 and 2015-GS-04-01177, the verdict form in the case of the State of South Carolina versus Debra Lynne Sheridan, defendant.

Under indictment number 2015-GS-04-01175, possession of methamphetamine, we, the jury, unanimously find on this indictment that the defendant, Debra Lynne Sheridan, is guilty of possession of methamphetamine.

Under indictment number 2015-GS-04-01176, rabies control chapter violation, we, the jury, unanimously find on this indictment that the defendant, Debra Lynne Sheridan, is guilty of violating the rabies control chapter on all counts.

Under indictment number 2015-GS-04-01177, the ill treatment of animals, we, the jury, unanimously find on this indictment that the defendant, Debra Lynne Sheridan, is not guilty on all counts.

This is signed by the foreperson in Anderson, South Carolina on November the 20th, 2015.

Ladies and gentlemen of the jury, if this is your verdict, will you show by raising your right hand?

(WHEREUPON, all jurors' right hand was raised.)

THE CLERK: Your Honor, it is unanimous.

THE COURT: All right. Anything from the jury from the State?

MR. MCLAIN: No, sir. Your Honor.

THE COURT: Anything from the jury from the Defense?

MR. TONEY: Nothing further.

THE COURT: Ladies and gentlemen, thank you for your service. Jury duty is a very, very important civic duty. Our system of justice could not function without our citizens being willing to serve as jurors. And I thank you for your time and service this week. You are now dismissed.

Mr. Foreman, I need you to conform the indictments. If you'll step around.

(WHEREUPON, the jury exited the open court at approximately 2:25 p.m.)

THE COURT: All right. We're going to take a brief recess while we get our sentencing sheets together.

MR. TONEY: Yes, sir.

(WHEREUPON, court stood at ease.)

MR. TONEY: Judge, I do have a motion. Just standard.

THE COURT: Okay. Just let's get our sheets, and then we'll deal with everything.

MR. TONEY: Yes, sir.

(WHEREUPON, court stood at ease.)

THE COURT: Okay. Let's go back on the record. Mr. Toney?

MR. TONEY: Motion for a new trial and judgement notwithstanding the verdict and new trial especially as to the rabies based on the fact that PAWS testified that they didn't put tags on theirs. Judge, that's the extent of my motion.

THE COURT: All right. Denied.

MR. TONEY: Okay.

THE COURT: All right. Would you and your client come forward?

(WHEREUPON, the defendant and counsel approached the bar.)

THE COURT: In reading the statute, possession of methamphetamine first offense carries a maximum sentence of three years. The rabies control chapter violation carries a -- the statute reads the maximum allowed by a magistrate's court, which is thirty days or a five hundred dollar fine with assessments on each count.

Mr. McLain, I'll hear from you first.

MR. MCLAIN: Your Honor, I think it was brought out in trial obviously concerning her prior record. She

does have a prior mistreatment of animals conviction. She continues to get animals. She was convicted of possession of meth. She evidently has a meth problem. I don't think -- I do think that she needs a little bit of time. Basically, this is going to keep being a recurring thing where she gets overloaded with animals, the County goes and they take them away. She continues to do drugs. I think she does need a little bit of time. More importantly, I think a substantial amount of probation. And until she can get her problem under control, she doesn't need to be allowed to have animals. That's the last thing she needs. When she has a drug problem, she's dealing with her own issues, and she doesn't need to deal with sixty other living creatures who have -- I think it was well documented during the trial -- extensive health issues themselves.

THE COURT: All right. Well, Mr. McLain, I have a question now. I know the exhibit was put in from Mr. Toney about the vaccinations. Were any of these animals not vaccinated or was -- was that accurate from your reading of the records?

MR. MCLAIN: Your Honor, I have no way of knowing what dog those vaccination records go to. I mean, it could be a random sixty dogs that don't even belong to her that she just pulled out. I mean, there's

no way to tell if they've been vaccinated. She doesn't keep adequate records for anyone to know that.

THE COURT: Okay. Okay. All right. Other than the -- you've mentioned the previous conviction for ill treatment of animals. Is there any other prior record?

MR. MCLAIN: No, sir, your Honor. She does have currently a hundred and nineteen pending charges for ill treatment of animals currently in magistrate court as well on a different set of animals. They were all taken from her voluntarily, according to that agreement we went over at the beginning of the trial.

THE COURT: That's the one nineteen she testified about?

MR. MCLAIN: That's correct. She gave those up voluntarily. And I would ask that the Judge allow PAWS to keep control of the dogs concerning this case. They clearly are having good treatment now. With her testimony, they're thriving now. And PAWS would like to be able to adopt them out.

THE COURT: Okay.

All right. Mr. Toney?

MR. TONEY: Your Honor, not only is she fifty years old, but she has no prior drug convictions whatsoever.

The rabies violations are -- I understand that she's been found guilty of them. I believe they're in the nature of a technical violation in that she got the rabies shots for the dogs. It was uncontradicted that these were the certificates. But I think the jury wanted to look at the law, and they saw where the dogs were supposed to have the tags on them. Respectfully, I think she did everything she knew to do, but I don't think she was in technical compliance with the law. It may be a very good decision by the jury. The fact is I don't think the intent to harm was there, and I think the Court can take that into account.

As to the possession of meth, the amount was extremely small. And she has not even a marijuana ticket on her record, not even so much as a paraphernalia. She's never been to general sessions court. She's a fine upstanding citizen. And I would add her mom died last year ---

THE DEFENDANT: This year.

MR. TONEY: --- this year. I'm sorry. And her father Jimmy Sheridan -- she testified extensively that he has health problems, some kind of -- something like Lupus. She takes care of him, and he relies on her. And she loves him. And I would ask that the Court consider a probationary sentence that would allow her to continue to

try to take care of her father. Thank you.

THE COURT: Okay. Anything you'd like to tell me, Ms Sheridan?

THE DEFENDANT: I don't have a drug problem. No, sir. Other than that, that's it.

MR. TONEY: She certainly would be willing that -- any tests that would be given or any counseling that's ordered or anything like that, she's certainly willing to do that, Judge.

THE DEFENDANT: I try to help -- I help with DSS. I have people come in that do have drug problems and work there during their time or whenever they come there to work. So I don't allow that. Never have.

THE COURT: How many dogs did they leave at your property?

THE DEFENDANT: They left two plus the ones that were at my father's, my father's dogs. They said a total of about eleven. Then they left twenty-six cats.

THE COURT: So you still have eleven dogs and twenty-six cats?

THE DEFENDANT: They're my father's. The dogs, except for two of them, are my father's.

THE COURT: And you work, you said, three days a week?

THE DEFENDANT: Right now I'm only working one.

I cut back to about one just because mom died in April and I don't really have to work. I just do that for when he needs some help.

THE COURT: Okay.

MR. MCLAIN: Your Honor, if I could add one more thing. She surrendered control of the hundred and nineteen just two months prior to these sixty being found. That's almost an animal a day that she collected during a two-month period.

THE COURT: How much time served does she have?

MR. TONEY: I think three days. Two and a half days approximately. Seventy-two hours maybe.

MR. MCLAIN: That's correct, Your Honor.

THE COURT: Seventy-two hours. That's three days. Okay.

All right. If there's nothing further, this will be the sentence of the Court.

On 2015-GS-04-01175, the meth charge, the defendant will be confined to the Department of Corrections for a term of three years. That would be suspended on the service of three days with probation for five years and one hundred hours public service. Special conditions of probation will be substance abuse counseling, random drug and alcohol testing and a prohibition on the defendant operating a rescue shelter, any rescue shelter, for

animals.

On 2015-GS-04-01176, each one of these offenses, fifty-four counts, would carry a thirty day sentence. So the defendant will be confined to the Department of Corrections for a term of one thousand six hundred and twenty days. That would be suspended on service of three days, probation for five years. Same conditions of one hundred hours of public service, random drug and alcohol testing, substance abuse counseling as directed, and defendant shall not operate a rescue shelter for animals. This is a concurrent sentence.

And I would ask the solicitor to provide me an order so that the animals in custody would be turned over to Anderson County for disposition.

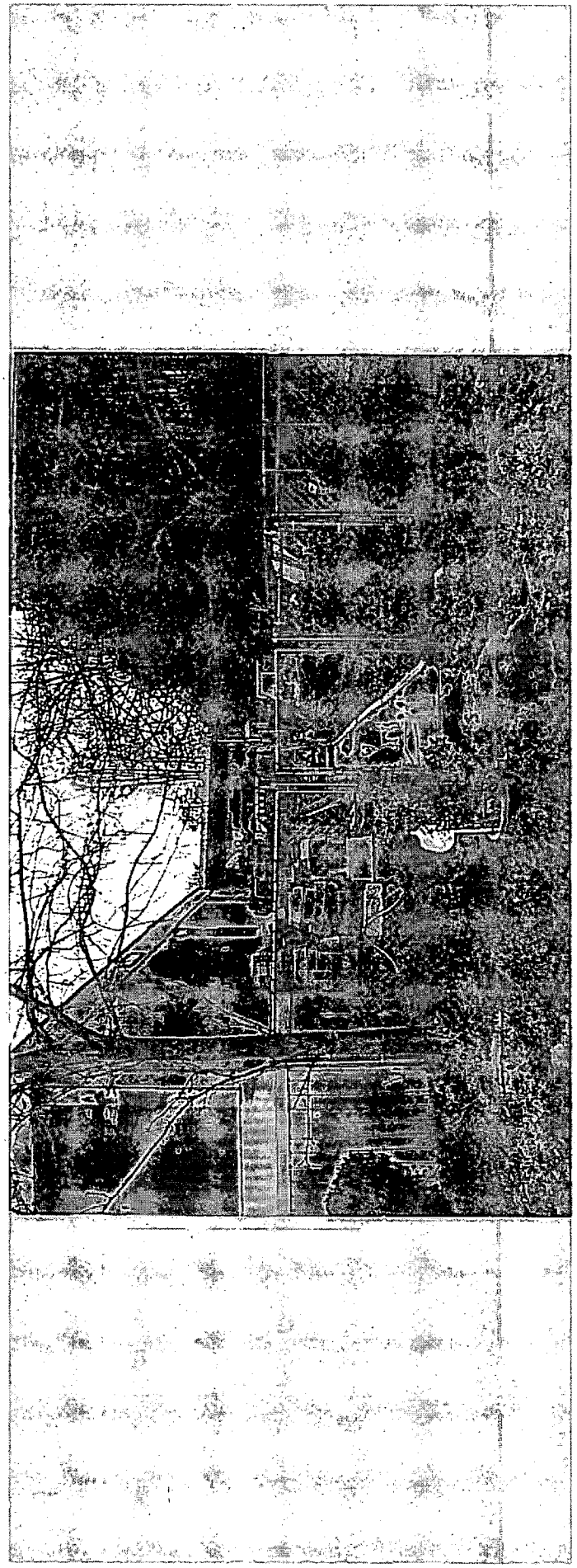
MR. MCLAIN: Thank you, Your Honor.

MR. TONEY: Thank you, Judge. Thank you very much.

THE COURT: Good luck to you ma'am.

(WHEREUPON, the trial concluded at approximately 2:45 p.m.)

*** END OF REQUESTED TRANSCRIPT OF RECORD ***



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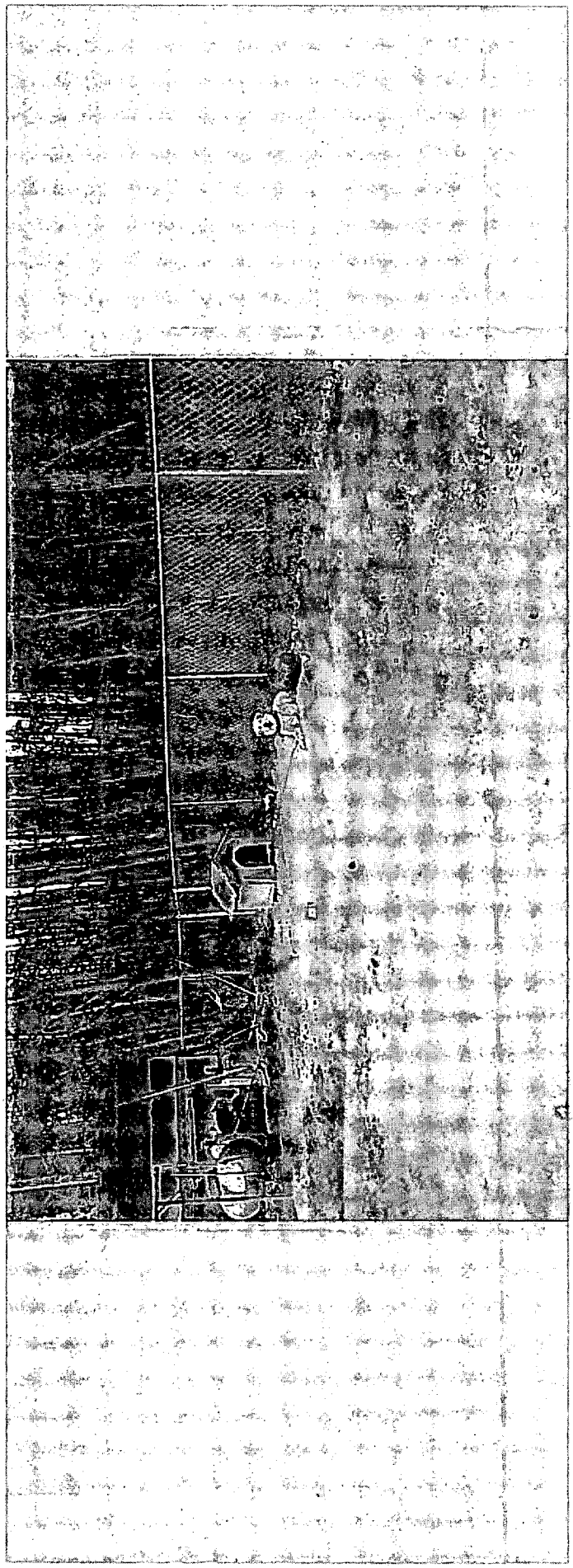

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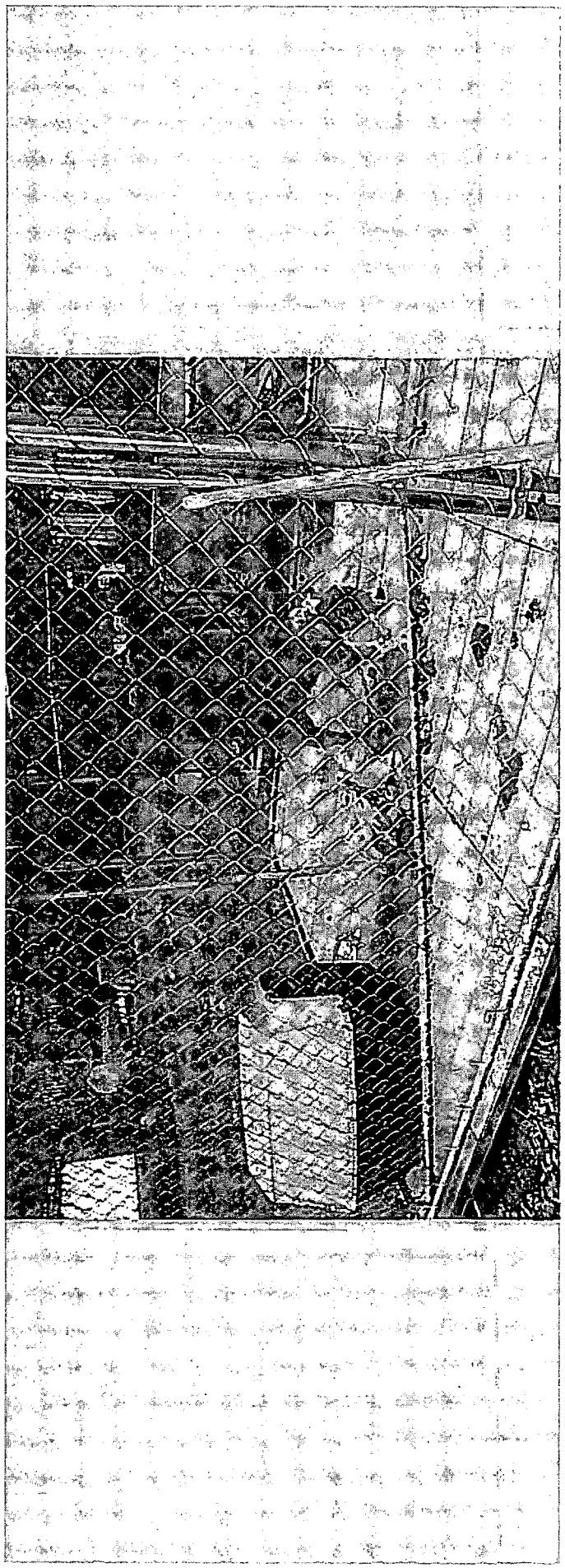

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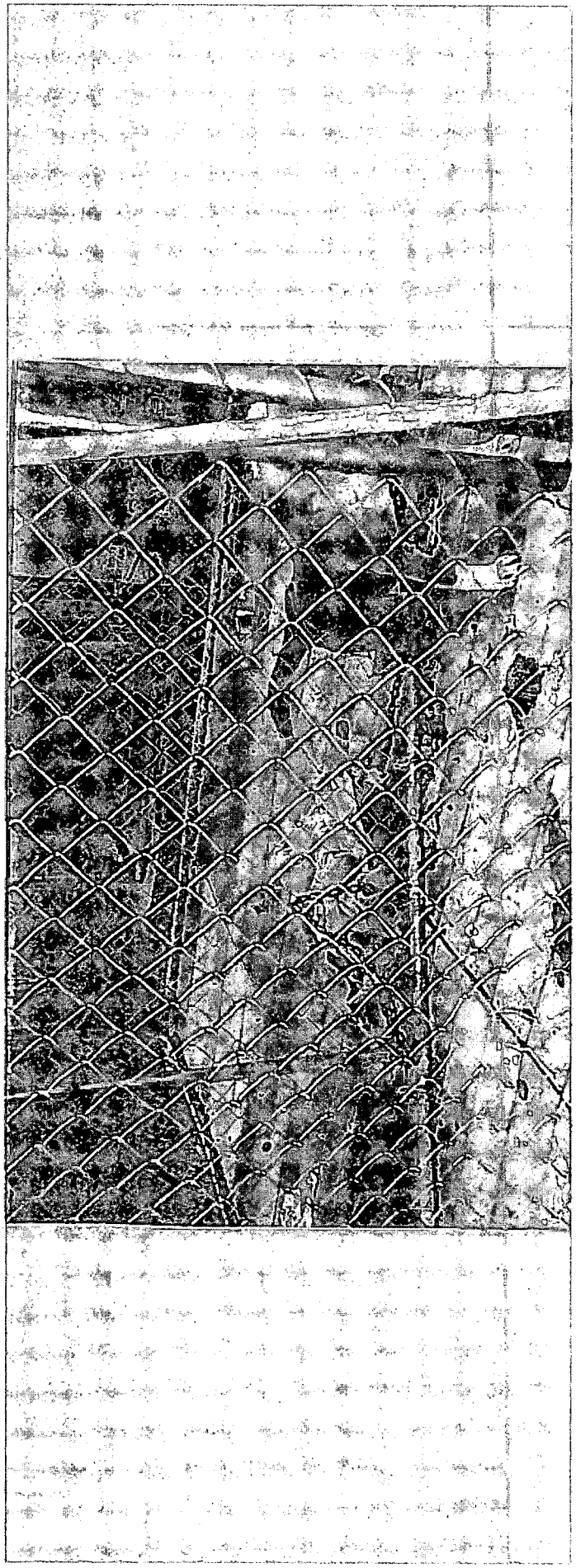

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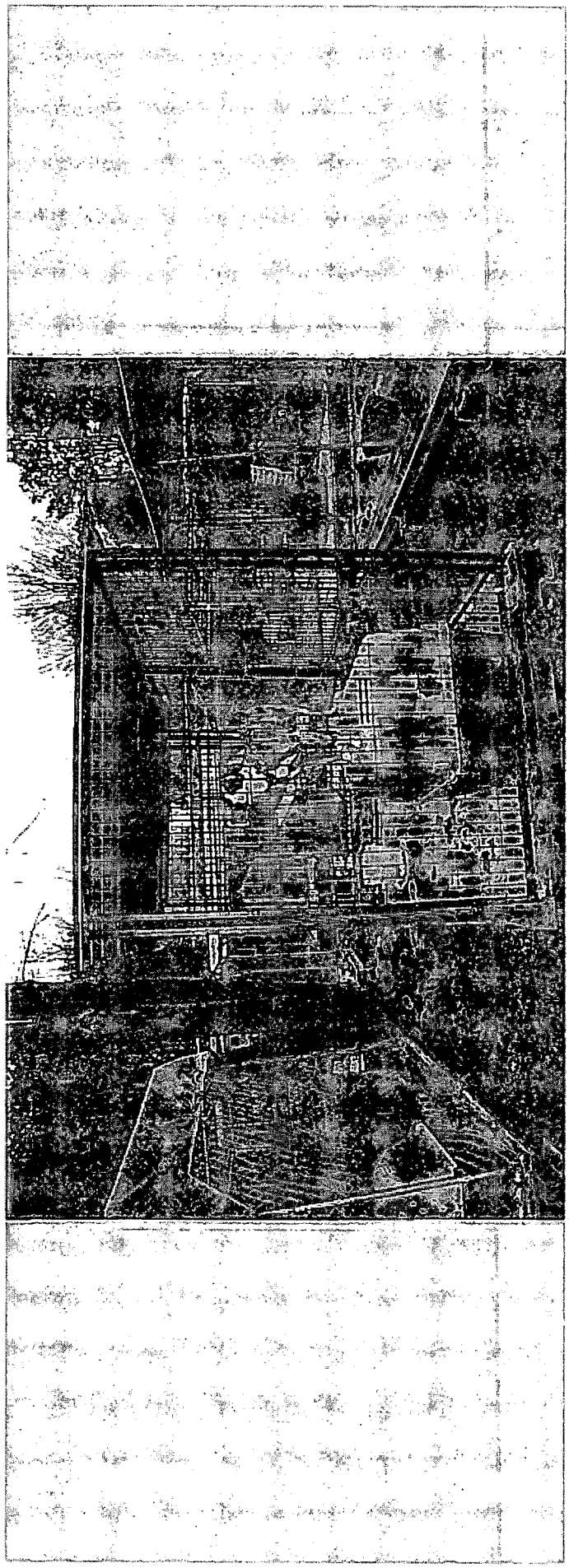

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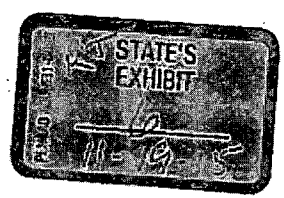

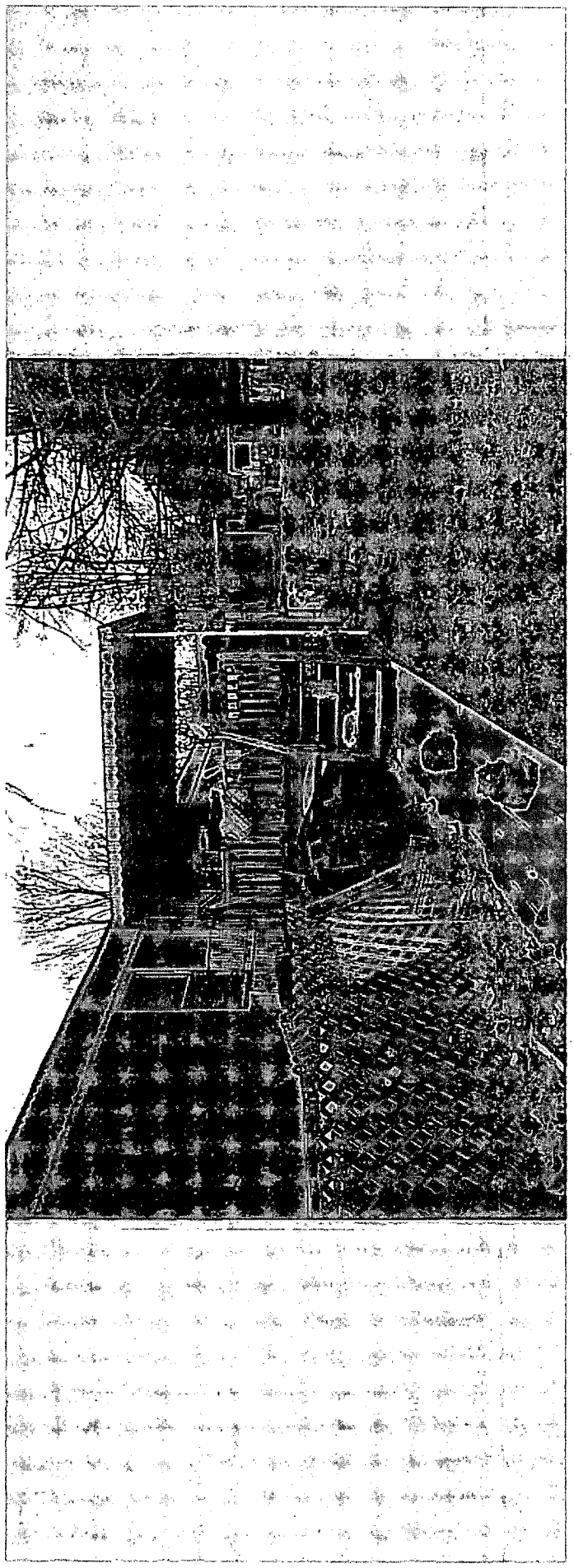

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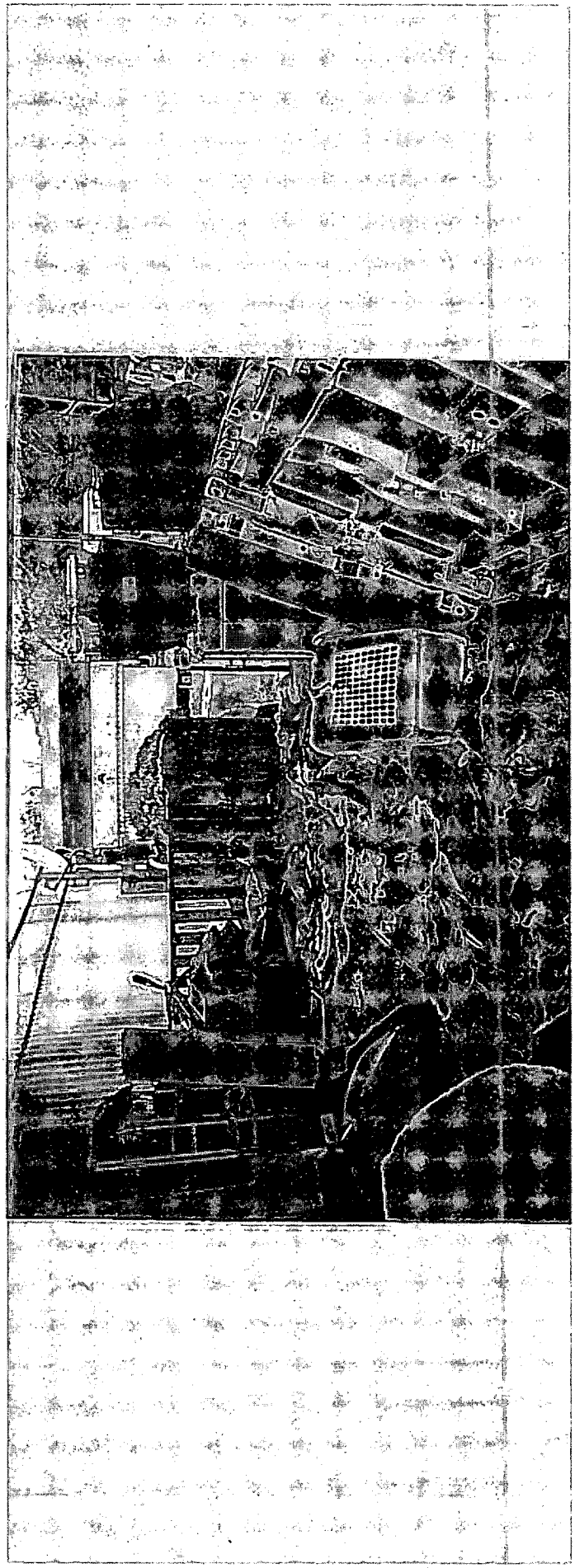

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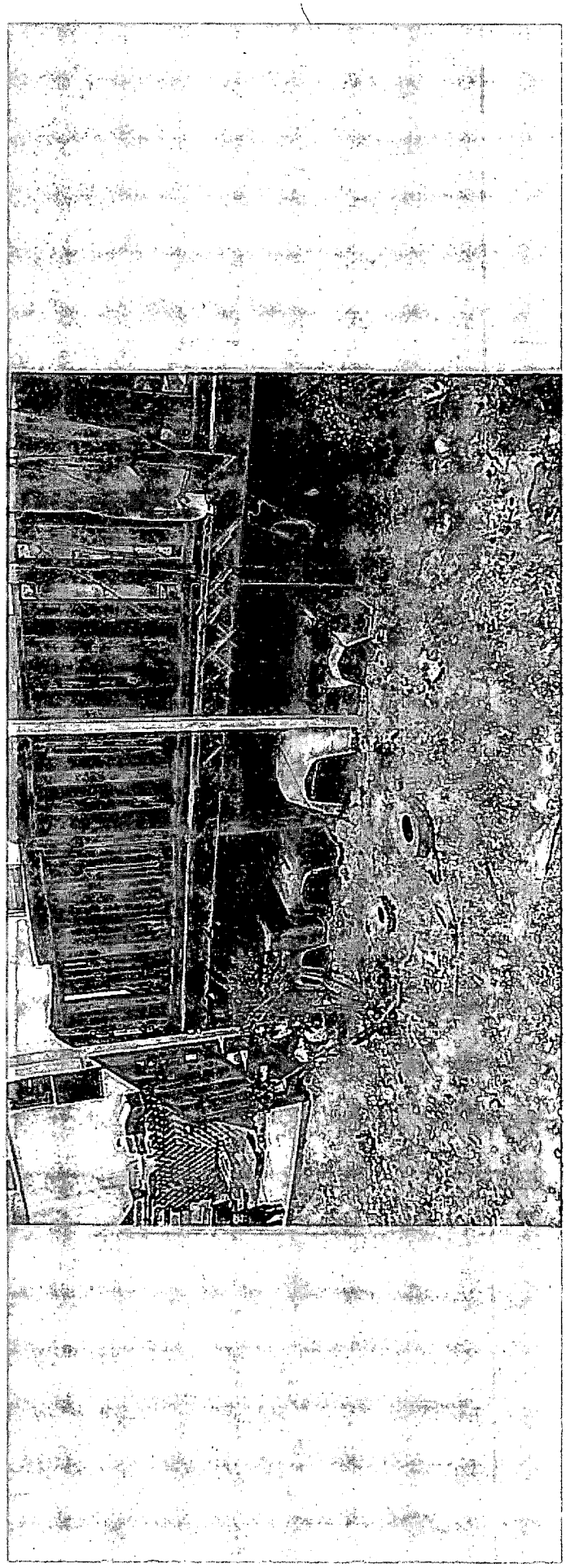

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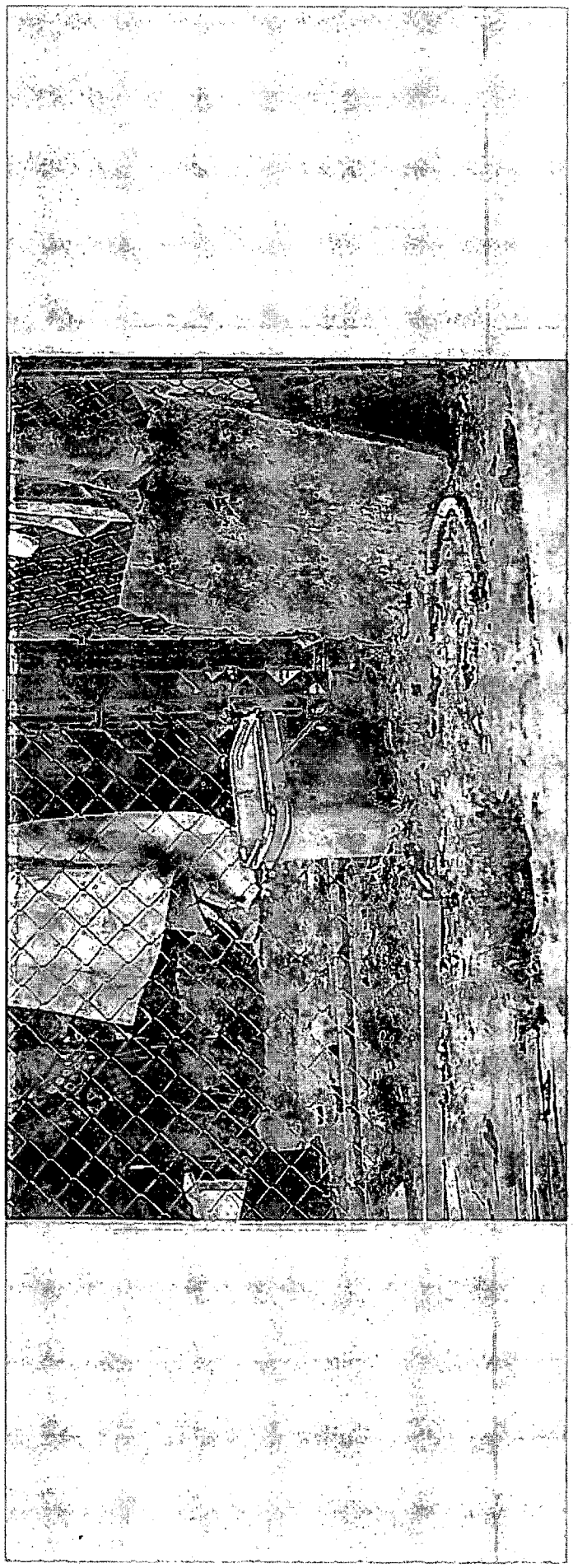

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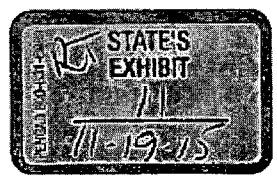

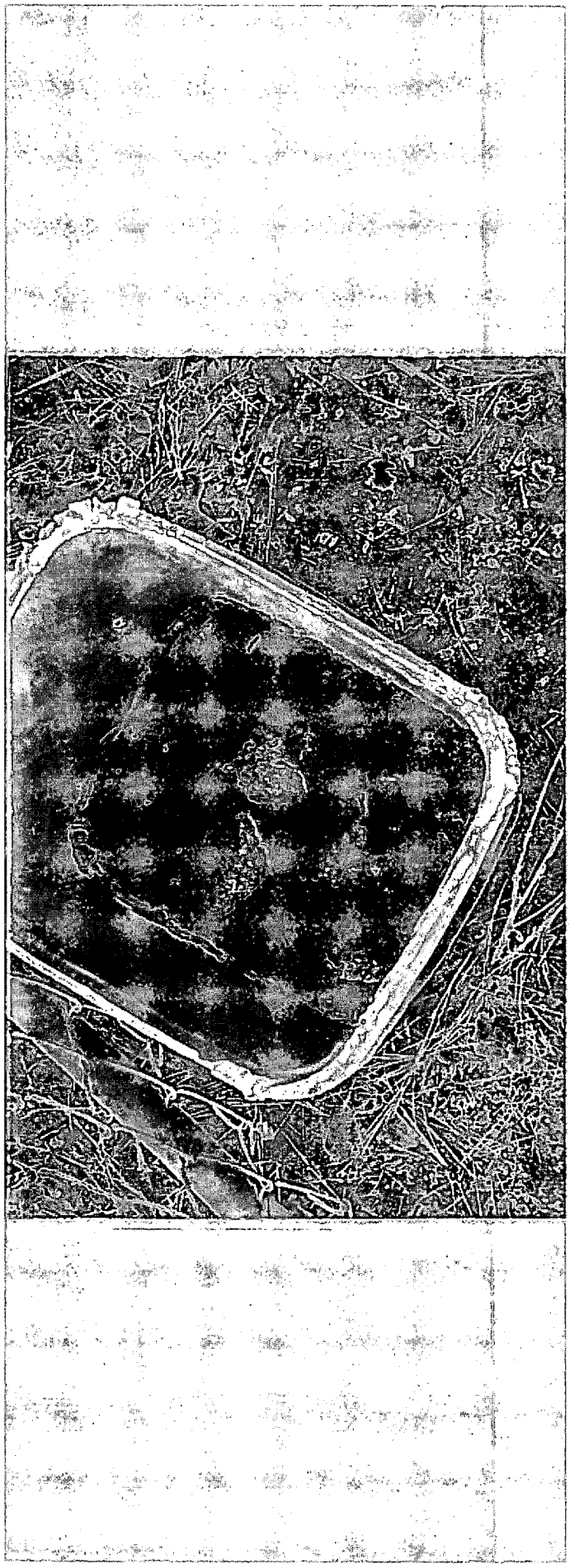

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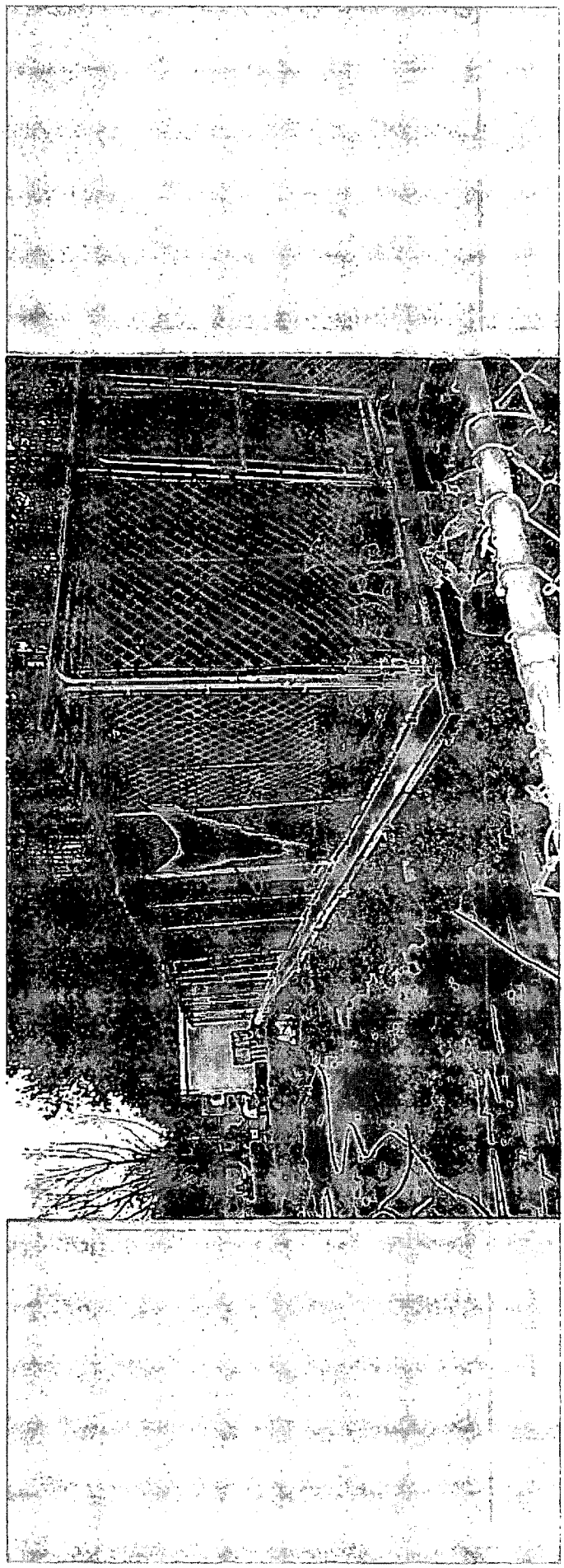

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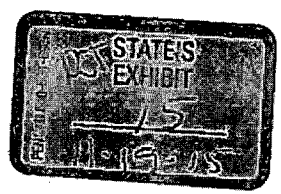

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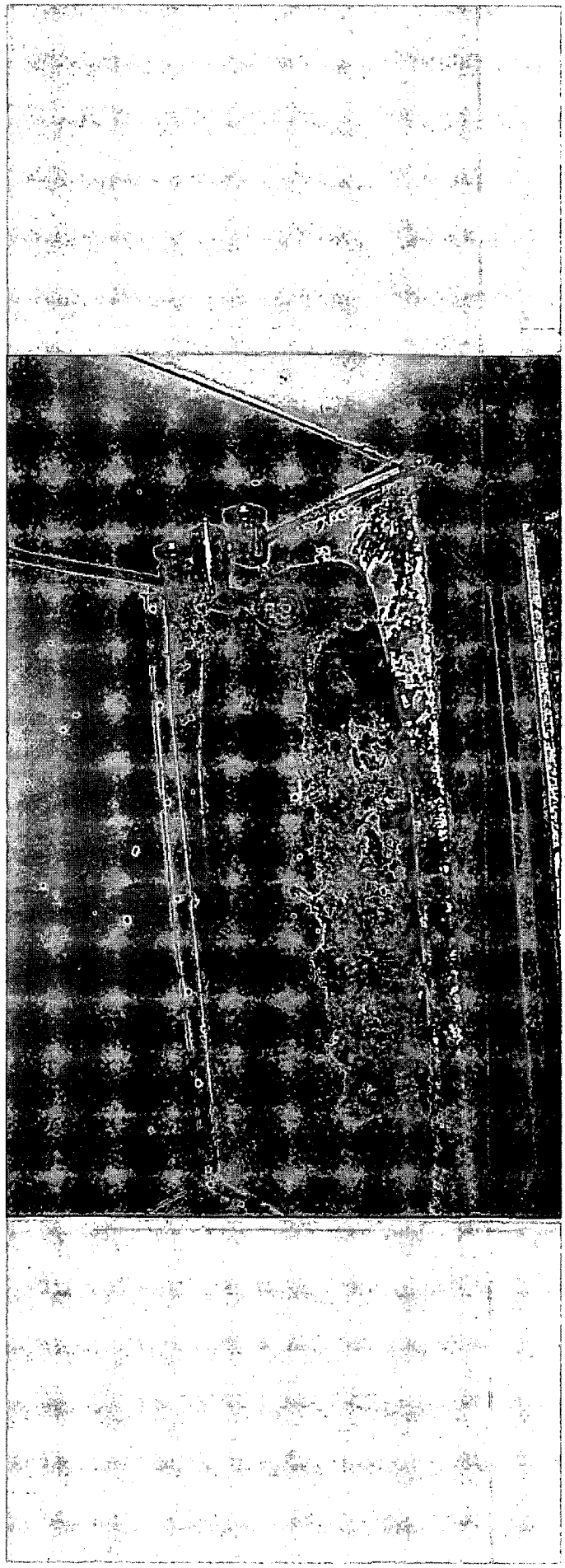

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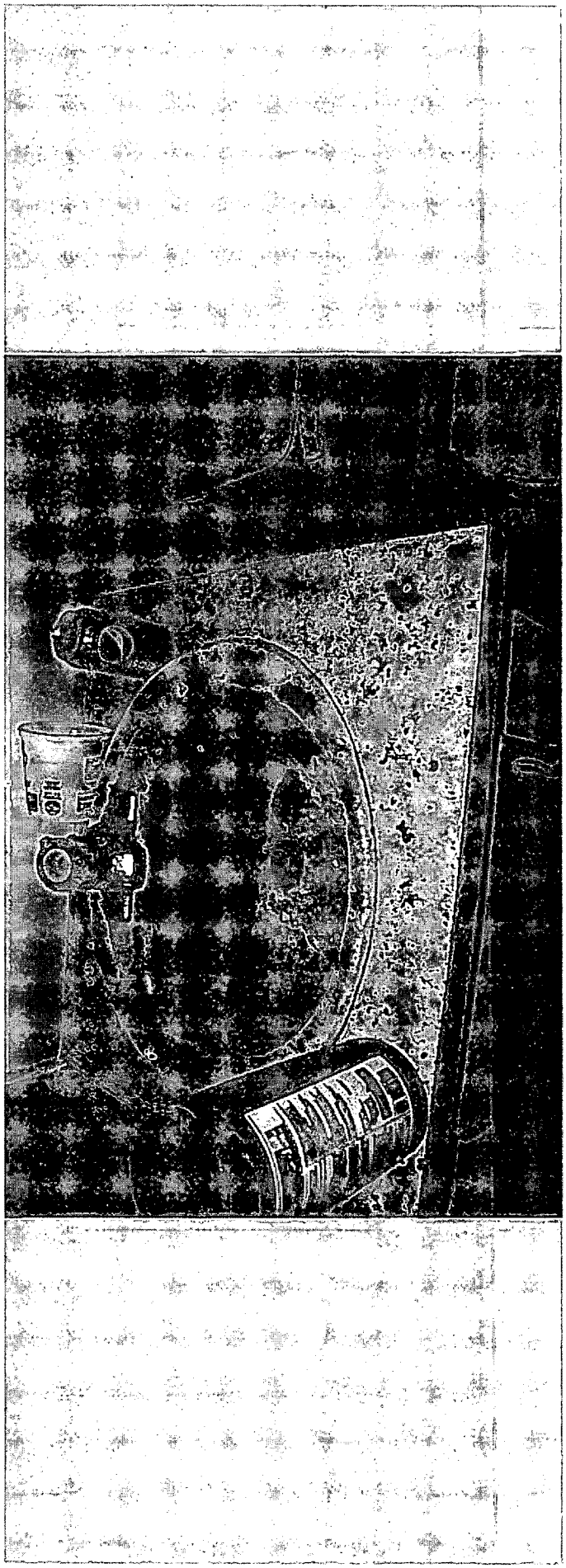

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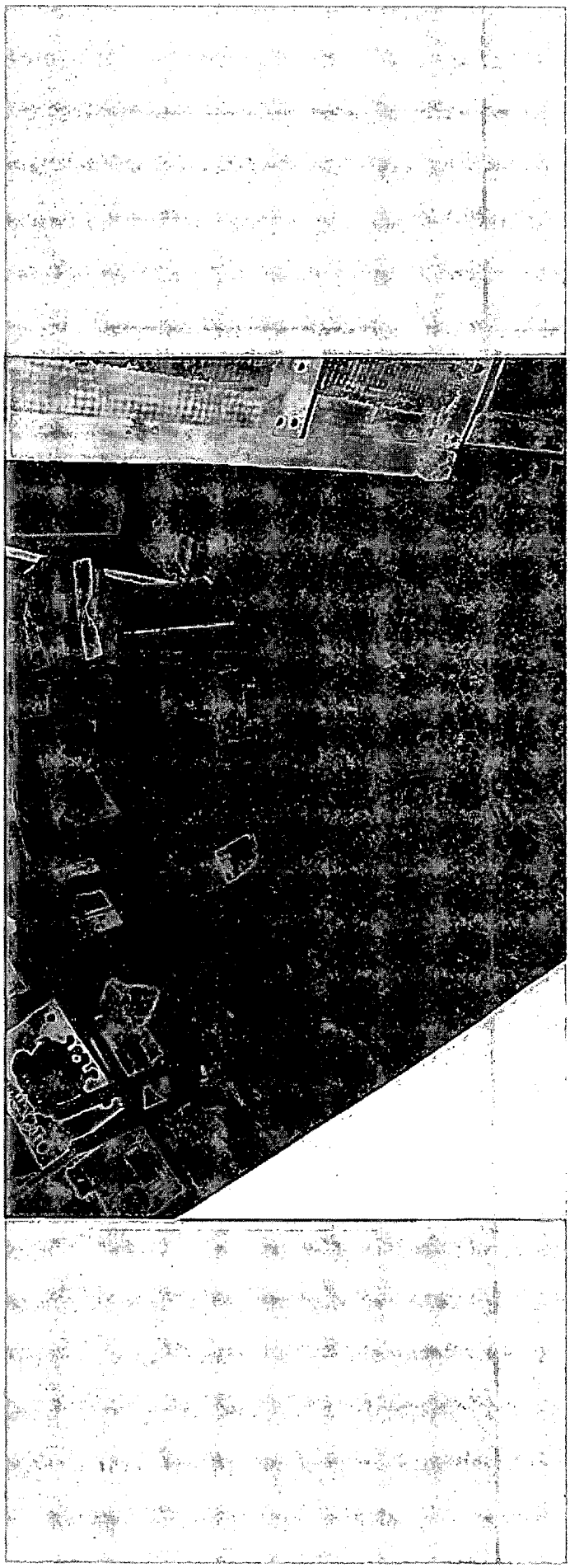

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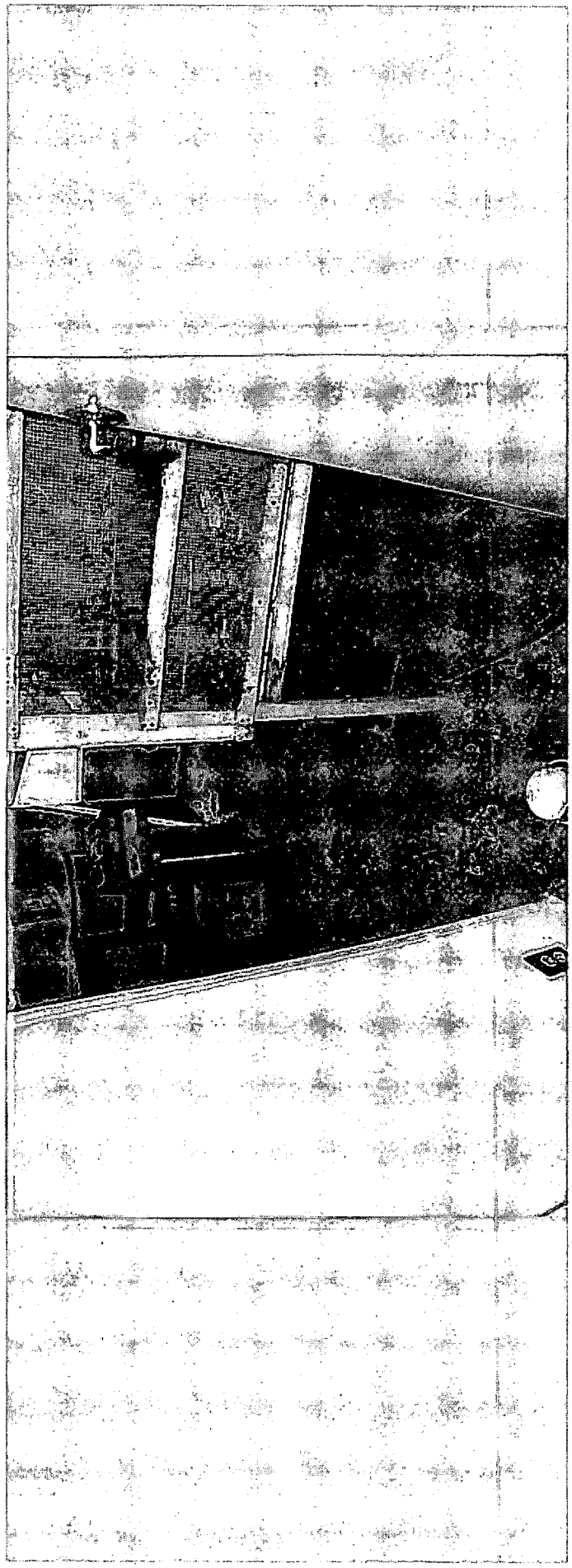

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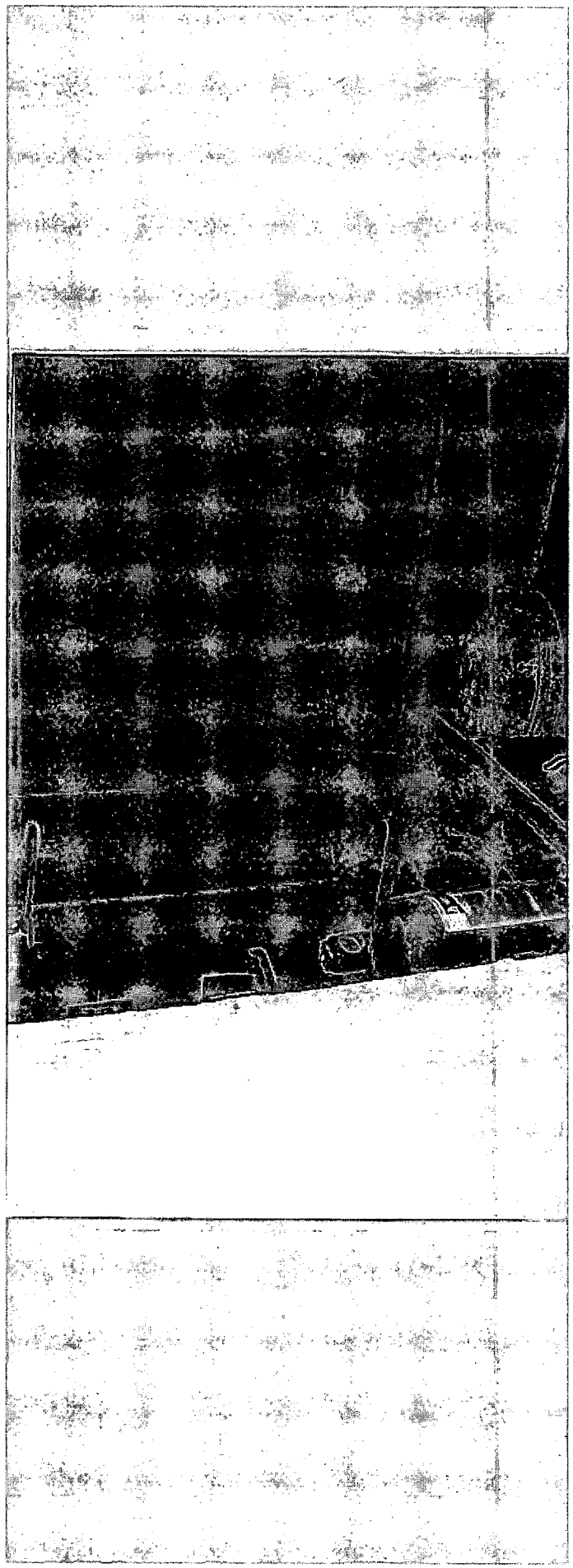

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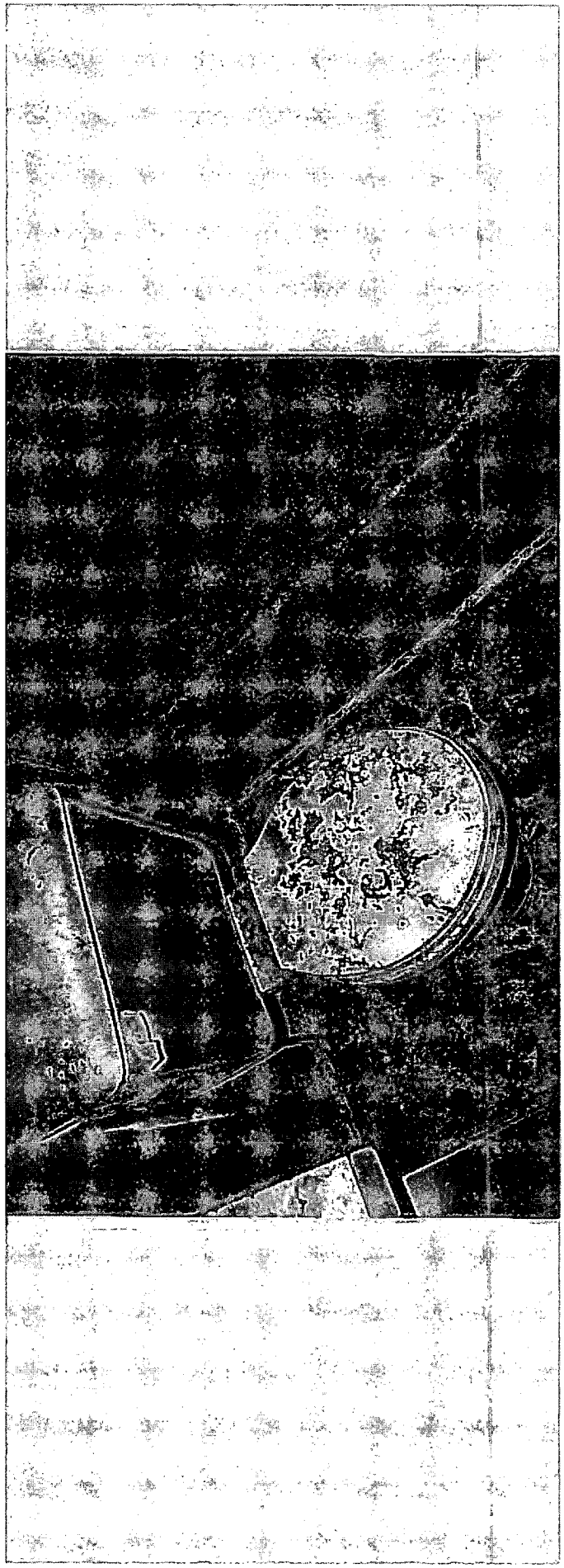

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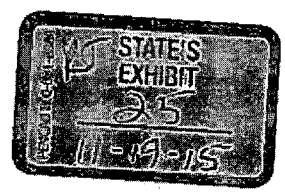

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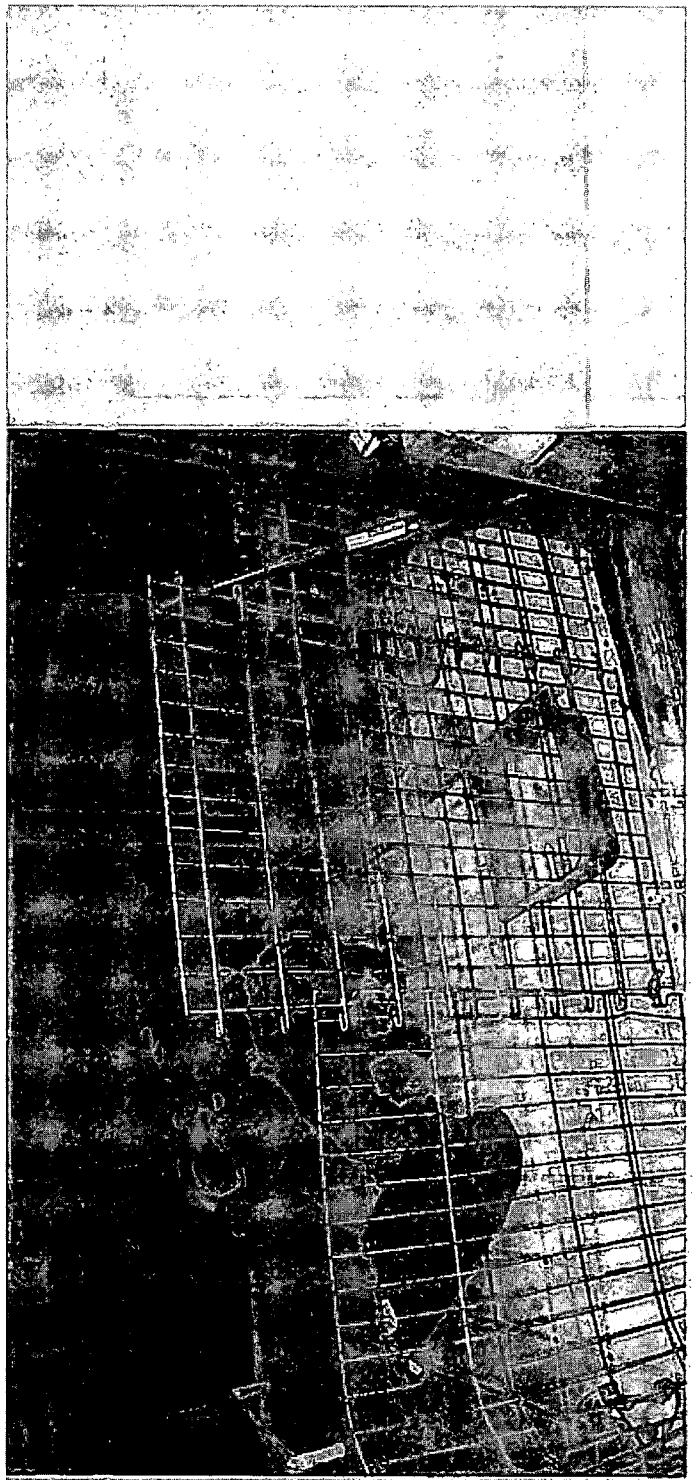

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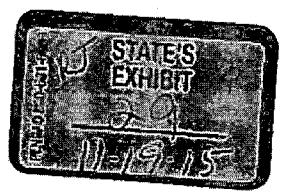

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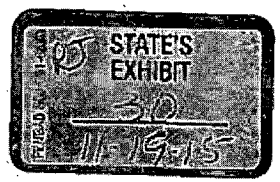

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GENERAL SESSIONS

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COMMON PLEAS AND
GENERAL SESSIONS

ANDERSON COUNTY SUMMARY COURT

RE: State of South Carolina vs. Debra Lynne Sheridan

FILED-CLERK'S OFFICE
ANDERSON SC
2015 NOV 23 AM 9:05
COMMON PLEAS AND
GENERAL SESSIONS

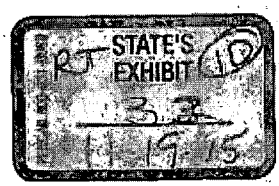
AGREEMENT

I find that Debra Lynne Sheridan was charged with Ill Treatment of Animals under Warrant #'s 2014A0410100120 and 2014A0410100121 and under UTT's 33038FI and with Improper Burial under UTT # 33039FI. By agreement of the all parties dated January 13, 2015 it is hereby agreed as follows:

That Debra Lynne Sheridan hereby relinquishes all rights to any and all animals now in the custody of the Anderson County P. A. W. S. (Pets Are Worth Saving) effective January 14, 2015.

That Debra Lynne Sheridan shall have ten (10) days from January 14, 2015 to have a person who is licensed by the South Carolina Labor, Licensing and Regulation Board in the area of Perpetual Care to take the remains of a Pomeranian taken from the property of Debra Lynne Sheridan on February 5, 2014 and properly bury or cremate the same.

That Debra Lynne Sheridan shall have until June 15, 2016 to obtain legal permits to construct a 75' feet by 75' feet warehouse structure with concrete floors and proper drainage to operate an animal rescue organization with routine and random welfare checks to be conducted by the Anderson County Sheriff's Office or any other law enforcement agency with jurisdiction to



ensure compliance with any and all State and County Ordinances that relate to the care and treatment of animals.

The State of South Carolina agrees to return a computer seized by the Anderson County Sheriff's Office on February 5, 2014. Furthermore, the State of South Carolina agrees to defer the above-mentioned charges until June 15, 2016, subject to the conditions outlined in this agreement. If Debra Lynne Sheridan satisfies these conditions then the Solicitor will dismiss the pending charges against the Defendant on June 15, 2016. However, if Debra Lynne Sheridan violates any of these agreed-upon conditions within the time period prescribed, then the Solicitor retains the right to reinitiate these pending charges and proceed with the prosecution of said charges.

This Agreement shall remain in full force unless amended or revoked by subsequent agreement and consent of all parties.

Thomas W. Dunaway, IV,
Asst. Solicitor, 10th Judicial Circuit

Witnessed by Nancy W. Devine,
Anderson County Chief Magistrate Judge

Dated this 14th day of January 2015 in Anderson, South Carolina

InterAct

CAD Detail

Print Date: Mar 18, 2015
Print Time: 6:48:52 PM
User Name: froberts

Hide Incident Log ;Hide System Messages ;Hide Media ;

Incident #2015-00079524

Incident Location:	818 HAMLIN RD, Easley	Apt:	
Inc Loc Info:		Latitude:	34.72767968681546
Building:		Longitude:	-82.61727731970213
Community:	Easley		
Municipality:	Easley		
Caller Name:		Incident Disposition:	C
Caller Location:		Apt:	
Call Loc Info:		Building:	
Phone:		Source:	O
Incoming 911:	Mar 18, 2015 10:20:23 AM	Created By:	froberts
Create Date/Time:	Mar 18, 2015 10:20:23 AM	Sent By:	froberts
Dispatch Date/Time:	*Mar 18, 2015 10:20:22 AM	Language:	
Enroute Date/Time:	*Mar 18, 2015 10:20:23 AM		
Onscene Date/Time:	Mar 18, 2015 10:20:24 AM	Priority:	2
Clear Date/Time:	Mar 18, 2015 6:27:45 PM	Event:	SIG99A
Closed Date/Time:	Mar 18, 2015 6:27:45 PM	Case#:	2015-05587

FILED-CLERK'S OFFICE ANDERSON SC
2015 NOV 23 AM 9:05
COMMON PLEAS AND GENERAL SESSIONS

Remarks:

User Name	Date/Time	Remarks
froberts	Mar 18, 2015 10:20:25 AM	WELFARE CHECK COURT ORDERED
froberts	Mar 18, 2015 10:41:07 AM	H-10 LT POWELL REQUESTING TRANSPORT UNIT TO TAKE ONE TO ACDC AND FORENSIC UNIT
froberts	Mar 18, 2015 10:50:25 AM	PER COUTNY V-63 IS 1017 FROM THE OFFICE
froberts	Mar 18, 2015 10:53:23 AM	WARRANTS DIV WILL GET A UNIT 1017 ASAP
froberts	Mar 18, 2015 11:19:00 AM	08:17 03/18/2015 04621 SC0040000 *08AC0028C8 TXT N.C. VEHICLE REGISTRATION SYSTEM RESPONSE BASED UPON; PLATE NO: TAG # YEAR: LIENS: PAGES: 7 ATTENTION: VEHICLE DETAIL RESPONSE VIN: VIN # 1996 MAZDA TK TITLE NO: TITLE # PURCHASE DT: 04301996

DEFENDANT'S EXHIBIT 1 11-19-15

InterAct

CAD Detail

Print Date: Mar 18, 2015
Print Time: 6:48:52 PM
User Name: froberts

Hide Incident Log ;Hide System Messages ;Hide Media ;

Remarks:

User Name	Date/Time	Remarks
		THOMAS EZEKIEL SMITH PLACARD STATUS: ACTIVE CUSTOMER ID: 14923898 DOB: HANDICAP PLACARD: 32238M MAMIE LOUISE SMITH PLACARD STATUS: ACTIVE 5816 BADIN CT TAX COUNTY: CUMBERLAND FAYETTEVILLE NC 28314-1371 PLT STATUS: EXPIRED CURRENT PLATE NO: TAG # WGT: 4000 ISSUE DT: 07092013 VALID THRU: 09152014 INS CO: UNITED SERVICES AUTOMOBILE AS POLICY: INS POLICY # PRIOR PLATE NO: TAG # WGT: 4000 ISSUE DT: 08032012 VALID THRU: 09152013 INS CO: HARTFORD CASUALTY INSURANCE C POLICY: INS POLICY # *VEHICLE HAS AN INSPECTION VIOLATION* VEHICLE LAST INSPECTED ON: 2013-07-31 *END OF MESSAGE*.

Unit Activity:

Unit	Employee	Platform	Status	Location	Date/Time
A-36		Anderson.LAW.SHERIFF	Dispatched		Mar 18, 2015 10:59:24 AM
A-36		Anderson.LAW.SHERIFF	Enroute		Mar 18, 2015 10:59:25 AM
A-36		Anderson.LAW.SHERIFF	Onscene		Mar 18, 2015 11:26:15 AM
A-36		Anderson.LAW.SHERIFF	1017J		Mar 18, 2015 11:42:06 AM
A-36		Anderson.LAW.SHERIFF	1017J		Mar 18, 2015 11:42:06 AM
Remarks:	149498				
A-36		Anderson.LAW.SHERIFF	1023J		Mar 18, 2015 12:05:30 PM
A-36		Anderson.LAW.SHERIFF	1023J		Mar 18, 2015 12:05:31 PM
Remarks:	149516				
A-36		Anderson.LAW.SHERIFF	Other		Mar 18, 2015 1:20:26 PM
H-10	JOEL POWELL	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Dispatched		Mar 18, 2015 10:40:12 AM
H-10	JOEL POWELL	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Enroute		Mar 18, 2015 10:40:13 AM
H-10	JOEL POWELL	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Onscene		Mar 18, 2015 10:40:14 AM
H-10	JOEL POWELL	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	1017A		Mar 18, 2015 5:13:09 PM
H-10	JOEL POWELL	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Available		Mar 18, 2015 6:27:31 PM
H-30	JERRY	Anderson.LAW.	Dispatched		Mar 18, 2015 10:20:22 AM

InterAct

CAD Detail

Print Date: Mar 18, 2015
Print Time: 6:48:53 PM
User Name: froberts

Hide Incident Log ;Hide System Messages ;Hide Media ;

Unit Activity:

Unit	Employee	Department	Status	Location	Date/Time
	BRUCE	ANDERSON COUNTY ANIMAL CONTROL			
H-30	JERRY BRUCE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Enroute		Mar 18, 2015 10:20:23 AM
H-30	JERRY BRUCE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Onscene		Mar 18, 2015 10:20:24 AM
H-30		ANDERSON COUNTY ANIMAL CONTROL	Case Number	2015-05587	Mar 18, 2015 10:20:44 AM
H-30	JERRY BRUCE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	1017A		Mar 18, 2015 5:12:43 PM
H-30	JERRY BRUCE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Available		Mar 18, 2015 6:27:26 PM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Dispatched		Mar 18, 2015 10:20:27 AM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Enroute		Mar 18, 2015 10:20:28 AM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Onscene		Mar 18, 2015 10:20:29 AM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Secondary En Route		Mar 18, 2015 5:12:47 PM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	1017A		Mar 18, 2015 5:12:53 PM
H-31	MICHELLE SMITH	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Available		Mar 18, 2015 6:27:35 PM
H-32	JASON HANKS	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Dispatched		Mar 18, 2015 10:20:30 AM
H-32	JASON HANKS	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Enroute		Mar 18, 2015 10:20:31 AM
H-32	JASON HANKS	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Onscene		Mar 18, 2015 10:20:32 AM
H-32	JASON HANKS	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	1017A		Mar 18, 2015 5:12:58 PM

InterAct

CAD Detail

Print Date: Mar 18, 2015
Print Time: 6:48:53 PM
User Name: froberts

Hide Incident Log ;Hide System Messages ;Hide Media ;

Unit Activity:

Unit	Employee	Department	Status	Location	Date/Time
H-32	JASON HANKS	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Available		Mar 18, 2015 6:27:38 PM
H-36	JAMIE DOYLE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Dispatched		Mar 18, 2015 10:20:32 AM
H-36	JAMIE DOYLE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Enroute		Mar 18, 2015 10:20:33 AM
H-36	JAMIE DOYLE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Onscene		Mar 18, 2015 10:20:34 AM
H-36	JAMIE DOYLE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	1017A		Mar 18, 2015 5:13:03 PM
H-36	JAMIE DOYLE	Anderson.LAW.ANDERSON COUNTY ANIMAL CONTROL	Available		Mar 18, 2015 6:27:41 PM
V-60	CHRIS BEUSSE	Anderson.LAW.SHERIFF	Dispatched		Mar 18, 2015 10:46:57 AM
V-60	CHRIS BEUSSE	Anderson.LAW.SHERIFF	Enroute		Mar 18, 2015 10:46:58 AM
V-60	CHRIS BEUSSE	Anderson.LAW.SHERIFF	Onscene		Mar 18, 2015 11:21:35 AM
V-60	CHRIS BEUSSE	Anderson.LAW.SHERIFF	Acknowledged		Mar 18, 2015 2:32:23 PM
V-60	CHRIS BEUSSE	Anderson.LAW.SHERIFF	Available		Mar 18, 2015 4:35:51 PM
V-61	JUSTIN RICHEY	Anderson.LAW.SHERIFF	Dispatched		Mar 18, 2015 4:36:11 PM
V-61	JUSTIN RICHEY	Anderson.LAW.SHERIFF	Enroute		Mar 18, 2015 4:36:12 PM
V-61	JUSTIN RICHEY	Anderson.LAW.SHERIFF	Onscene		Mar 18, 2015 4:36:13 PM
V-61	JUSTIN RICHEY	Anderson.LAW.SHERIFF	Available		Mar 18, 2015 5:07:33 PM
V-63	CRAIG HOLLBROOKS	Anderson.LAW.SHERIFF	Dispatched		Mar 18, 2015 12:25:23 PM
V-63	CRAIG HOLLBROOKS	Anderson.LAW.SHERIFF	Enroute		Mar 18, 2015 12:25:24 PM
V-63	CRAIG HOLLBROOKS	Anderson.LAW.SHERIFF	Onscene		Mar 18, 2015 2:32:17 PM
V-63	CRAIG HOLLBROOKS	Anderson.LAW.SHERIFF	Acknowledged		Mar 18, 2015 2:32:20 PM
V-63	CRAIG	Anderson.LAW.SHERIFF	Available		Mar 18, 2015 4:41:55 PM

InterAct

CAD Detail

Print Date: Mar 18, 2015
Print Time: 6:48:53 PM
User Name: froberts

Hide Incident Log ;Hide System Messages ;Hide Media ;

Unit Activity:

Unit	Employee	Department	Status	Location	Date/Time
	HOLLBROOKS				

Dispositions:

Incident Disposition	Remarks
C - Incident processing has been completed	

Unit Disposition	Unit On	Count	Unit	Remarks
C-COMPLETE	ANDERSON COUNTY ANIMAL CONTROL	1	H-30	
C-COMPLETE	ANDERSON COUNTY ANIMAL CONTROL	1	H-31	
C-COMPLETE	ANDERSON COUNTY ANIMAL CONTROL	1	H-32	
C-COMPLETE	ANDERSON COUNTY ANIMAL CONTROL	1	H-36	
C-COMPLETE	ANDERSON COUNTY ANIMAL CONTROL	1	H-10	
C-COMPLETE	SHERIFF	1	V-63	
C-COMPLETE	SHERIFF	1	V-60	
7-TURNED OVER TO ANOTHER AGENCY	SHERIFF	1	A-36	
C-COMPLETE	SHERIFF	1	V-61	

FILED-CLERK'S OFFICE
ANDERSON SC

2015 NOV 23 AM 9:04

COMMON PLEAS AND
GENERAL SESSIONS

OWNER'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 96

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Corgi Dog	White
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Cassie	
			Actual ____ lbs.		

DATE VACCINATED: 3 (Month) 16 (Day) 15 (Year)

VACCINATION EXPIRED: 7 (Month) 16 (Day) 16 (Year)

Producer: B I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 625 (License No.)

Bob Medcalf (Signature)

Address: 864 582 0227

OWNER'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 394

Owner's Name and Address

PRINT - Last: Sherde | First: Deb | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Domin X	Orang
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		Brwn
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name Greeber	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 15 (Year)

Producer: B t (First 3 letters)

☐ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Meanhead (Signature)

Address:

864 502 0222

OWNER'S COPY
GSR

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 627

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☑	Under 20 lbs ☑	Boxer Dog	Black
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		White
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Milo	
			Actual ____ lbs.		

DATE VACCINATED: 1 (Month) 20 (Day) 15 (Year)

VACCINATION EXPIRED: 1 (Month) 20 (Day) 16 (Year)

Producer: BF (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorehead (Signature)

Address: 864 502-0222

OWNER'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

GSR

Owner's Name and Address

Rabies Tag Number: 392

PRINT - Last: Sheridan First: Debra M.I.: Telephone:

No. Street City State Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☒	3 mo to 12 mo ☐	Under 20 lbs. ☒	Pom	Blue
Cat ☐	Female ☐	12 mo or older ☒	20 - 50 lbs. ☐		White
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: KO-B	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 6 (Day) 15 (Year)

Producer: B I (First 3 letters)

☐ 1 yr. Lic./Vacc.

☒ 3 yr. Lic./Vacc.

____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

864 802 0222

OWNER'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address: GSR

Rabies Tag Number: 363

PRINT - Last: Sheridan First: Webre M.I.: Telephone:

No. Street City State Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Schnoodle	Tri.
Cat ☐	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: WINNIE	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 15 (Year)

Producer: B I (First 3 letters)

☐ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

864 502 0222

OWNER'S COPY
CSTL

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 61

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☑	Under 20 lbs. ☐	Black Tan	Blonde
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☑		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Daddy	
			Actual ____ lbs.		

DATE VACCINATED: 3 (Month) 3 (Day) 16 (Year)

VACCINATION EXPIRED: 3 (Month) 3 (Day) 16 (Year)

Producer: B I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's #: 628 (License No.)

Bob Moorhead (Signature)

Address: 864 802 0277

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 391

PRINT - Last: Sherrill | First: Debra | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Dmuck	Orange
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		White
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: Greaber	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 15 (Year)

Producer: B + (First 3 letters)

☐ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 6225 (License No.)

Bob Alcorn (Signature)

Address:

864 502 0222

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address: GSL

Rabies Tag Number: 363

PRINT - Last	First	M.I.	Telephone
Sheridan	Debbie		

No.	Street	City	State	Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Schnoodle	Tri.
Cat ☐	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: WINNIE	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 15 (Year)

Producer: B I (First 3 letters)

☐ 1 yr. Lic./Vacc.

☑ 3 yr. Lic./Vacc.

____ Other

Vacc. Serial (lot) no.

Veterinarian's #: 628 (License No.)

Bob Morehead (Signature)

Address:

864 502 0222

434

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 203

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	Mastiff	bl.
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☑		
Other: ☐ (Specify)	Neutered ☐	Actual Age 5 Y	Over 50 lbs. ☐ Actual 120 lbs.	Name: Damon	

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: ___ / ___ / ___ (Month / Day / Year)

Producer: PFI (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
_____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 395

PRINT - Last: Nelson — First: 5 Reasons — M.I. — Telephone: 919-413-0364

No. 818 Street: Hamlin Rd. — City: Easley — State: S.C. — Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	Tom	Black
Cat ☐	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: Pearl	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 13 (Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

864-[redacted]
502-0222

436

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

GSR
Owner's Name and Address

Rabies Tag Number: 592

PRINT - Last: Shevlin First: Debra M.I.: Telephone:

No. Street City State Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Pom	Blue
Cat ☐	Female ☐	12 mo or older ☑	20 - 50 lbs. ☐		White
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: KO-B	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 5 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 5 (Day) 15 (Year)

Producer: B T (First 3 letters)

☐ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's #: 1228 (License No.)

Bob Maynard (Signature)

Address:

864 502 0222

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 204

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	Mastiff	61.
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age 5 Y	Over 50 lbs. ☐ Actual 120 lbs.	Name: Goliath	

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: ___ / ___ / ___ (Month / Day / Year)

Producer: P F I (First 3 letters)

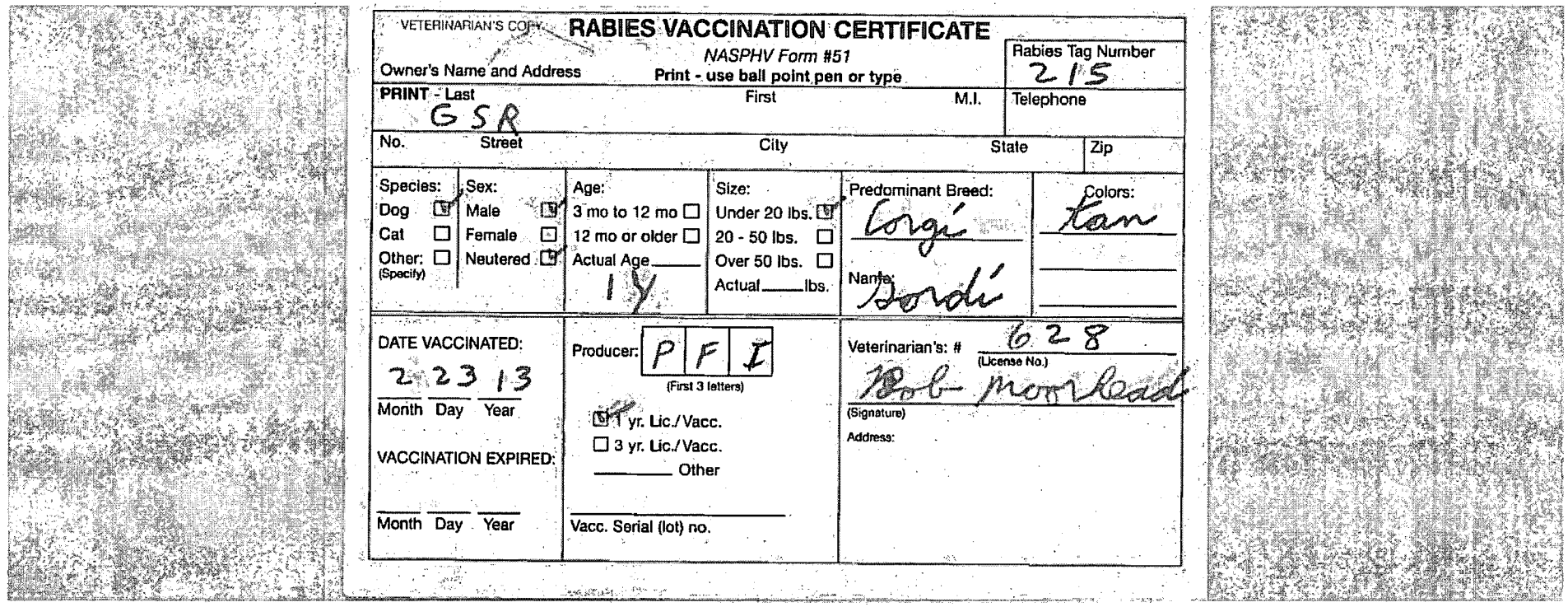
☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
_____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address

Rabies Tag Number: 215

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Corgi	tan
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age 1 Y	Over 50 lbs. ☐	Name: Dordi	
			Actual ____ lbs.		

DATE VACCINATED: 2 23 13 (Month Day Year)

VACCINATION EXPIRED: ____ ____ ____ (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Morhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 216

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	DLH	orange
Cat ☑	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age 1Y	Over 50 lbs. ☐	Name: Mr. Man	
			Actual ____ lbs.		

DATE VACCINATED: 2 (Month) 23 (Day) 13 (Year)

VACCINATION EXPIRED: 2 (Month) 23 (Day) 16 (Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
☐ ____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 202

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	S-T	bl. &
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		wh.
Other: ☐ (Specify)	Neutered ☐	Actual Age 2 Y	Over 50 lbs. ☐	Name: Bojangles	
			Actual ____ lbs.		

DATE VACCINATED: 3 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: ____ / ____ / ____ (Month / Day / Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Rob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 214

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	Boxer x Lab.	Brn. &
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		Wht.
Other: ☐ (Specify)	Neutered ☐	Actual Age 2 Y	Over 50 lbs. ☐	Name: Mango	
			Actual ____ lbs.		

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: 2 / 23 / 16 (Month / Day / Year)

Producer: P F I (First 3 letters)

☐ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 201

Owner's Name and Address

PRINT - Last: GSR First: M.I.: Telephone:

No. Street: City: State: Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	Cocker	bl-t
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☑	Name: Joe	wh-
Other: ☐ (Specify)	Neutered ☑	Actual Age 2 Y	Over 50 lbs. ☐ Actual ____ lbs.		

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: ____ / ____ / ____ (Month / Day / Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 213

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	Chi,	red
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age 1½ y	Over 50 lbs. ☐ Actual ____ lbs.	Name: Cuya Cafe	

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: 2 / 22 / 13 (Month / Day / Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
☐ ____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 248

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	[illegible]	Black
Cat ☐	Female ☐	12 mo or older ☑	20 - 50 lbs. ☑		[illegible]
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 03 26 14 (Month Day Year)

VACCINATION EXPIRED: 03 26 15 (Month Day Year)

Producer: [illegible] (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

[illegible] (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 1291

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☒	DSH	Blue
Cat ☒	Female ☒	12 mo or older ☒	20 - 50 lbs. ☐		Cream
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: [redacted]	
			Actual ____ lbs.		

DATE VACCINATED: 1 (Month) 10 (Day) 13 (Year)

VACCINATION EXPIRED: 1 (Month) 10 (Day) 14 (Year)

Producer: [ ] [ ] [ ] (First 3 letters)

☐ 1 yr. Lic./Vacc.
☒ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's #: 1629 (License No.)

Ron Harrison (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 126

Owner's Name and Address

PRINT - Last: GSR. | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	DSH	Cream
Cat ☑	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: Flo	
			Actual ____ lbs.		

DATE VACCINATED: 01 | 10 | 13 (Month | Day | Year)

VACCINATION EXPIRED: 1 | 10 | 16 (Month | Day | Year)

Producer: P F E (First 3 letters)

☑ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
☐ ____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 638 (License No.)

Pat Hildebrandt. (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 179

Owner's Name and Address

PRINT - Last: GOR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☒	3 mo to 12 mo ☐	Under 20 lbs. ☐		
Cat ☑	Female ☐	12 mo or older ☒	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 1 (Month) 10 (Day) 13 (Year)

VACCINATION EXPIRED: 1 (Month) 10 (Day) 16 (Year)

Producer: P | I | I (First 3 letters)

☒ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 625 (License No.)

Eco Veterinary (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 128

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☒	3 mo to 12 mo ☐	Under 20 lbs. ☒	DSH	orange
Cat ☐	Female ☐	12 mo or older ☒	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 1 (Month) 10 (Day) 22 (Year)

VACCINATION EXPIRED: 1 (Month) 10 (Day) 16 (Year)

Producer: P | F | I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☒ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's #: 178 (License No.)

Fido Morehead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 639

Owner's Name and Address

PRINT - Last: GOIR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Maltipoo	White
Cat ☐	Female ☐	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: fairbanks	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 4 (Day) 13 (Year)

VACCINATION EXPIRED: 10 (Month) 4 (Day) 16 (Year)

Producer: PIT (First 3 letters)

☑ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 620 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☒	3 mo to 12 mo ☐	Under 20 lbs. ☒	Shi-Tzu	Brown
Cat ☐	Female ☐	12 mo or older ☒	20 - 50 lbs. ☐		Tan
Other: ☐ (Specify)	Neutered ☒	Actual Age ____	Over 50 lbs: ☐	Name: Wilbur	
			Actual ____ lbs.	RaggaMuffin	

DATE VACCINATED: 10 22 13 (Month Day Year)

VACCINATION EXPIRED: 10 22 16 (Month Day Year)

Producer: P F I (First 3 letters)

☒ 1 yr. Lic./Vacc.

☒ 3 yr. Lic./Vacc.

____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

451

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 142

Owner's Name and Address

PRINT - Last: [illegible] First: M.I: Telephone:

No. Street City State Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☒		Pink
Cat ☐	Female ☒	12 mo or older ☒	20 - 50 lbs. ☐		White
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 01 / 13 / 13 (Month / Day / Year)

VACCINATION EXPIRED: 13 / 14 (Year)

Producer: PFI (First 3 letters)

☐ 1 yr. Lic./Vacc.
☒ 3 yr. Lic./Vacc.
☐ ____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Rob Mcarneal (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 96

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☑	Under 20 lbs. ☐	Doberman	Black
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☑		Tan
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Duke	
			Actual ____ lbs.		

DATE VACCINATED: 3 (Month) 2 (Day) 15 (Year)

VACCINATION EXPIRED: 3 (Month) 2 (Day) 16 (Year)

Producer: B I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

864 302 0222

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address: TARRS

Rabies Tag Number: 077

PRINT - Last: Sheridan | First: Debra | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	Siamese X	Cream
Cat ☑	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		Grey
Other: ☐ (Specify)	Neutered ☐	Actual Age____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 3 / 13 / 15 (Month / Day / Year)

VACCINATION EXPIRED: 3 / 13 / 16 (Month / Day / Year)

Producer: BE (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 1029 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 217

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	DLH	bl. & wh.
Cat ☑	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age 8M	Over 50 lbs. ☐ Actual ____ lbs.	Name: Cookie	

DATE VACCINATED: 2 / 23 / 13 (Month / Day / Year)

VACCINATION EXPIRED: 2 / 23 / 16 (Month / Day / Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☑ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

VETERINARIAN'S COPY 8512

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 96

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☐	Comb Dog	White
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Crystal	
			Actual ____ lbs.		

DATE VACCINATED: 3 / 16 / 15 (Month / Day / Year)

VACCINATION EXPIRED: 3 / 16 / 16 (Month / Day / Year)

Producer: [ ][ ][ ] (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 428 (License No.)

(Signature) Bob Moorhead

Address: 8645820277

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 247

Owner's Name and Address — **Print - use ball point pen or type**

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☐	3 mo to 12 mo ☒	Under 20 lbs. ☐	MIX	BLACK
Cat ☐	Female ☐	12 mo or older ☒	20 - 50 lbs. ☒		BROWN
Other: (Specify) ☐	Neutered ☒	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 03 26 16 (Month Day Year)

VACCINATION EXPIRED: 03 26 16 (Month Day Year)

Producer: ___ (First 3 letters)

☐ 1 yr. Lic./Vacc.
☒ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # ____ (License No.)

(Signature)

Address:

457

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — **Print - use ball point pen or type**

Rabies Tag Number: 004

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☑	Under 20 lbs. ☐	Boxer	Classic Fawn
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☑		
Other: ☐ (Specify)	Neutered ☐	Actual Age 4-5 month	Over 50 lbs. ☐	Name: Toby	
			Actual ____ lbs.		

DATE VACCINATED: 1 (Month) 5 (Day) 15 (Year)

VACCINATION EXPIRED: 1 (Month) 5 (Day) 16 (Year)

Producer: B I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorehead (Signature)

Address: 814 502 0222

VETERINARIAN'S COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 000404

Owner's Name and Address

PRINT - Last: Sheridan | First: DeBra | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☒	3 mo to 12 mo ☐	Under 20 lbs. ☐	Dog	BROWN
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☒		BLACK
Other: ☐ (Specify)	Neutered ☐	Actual Age 2 yr	Over 50 lbs. ☐	Name: Andy	
			Actual ____ lbs.		

DATE VACCINATED: 10 (Month) 17 (Day) 12 (Year)

VACCINATION EXPIRED: 10 (Month) 17 (Day) 15 (Year)

Producer: P B I (First 3 letters)

☒ 1 yr. Lic./Vacc.
☒ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

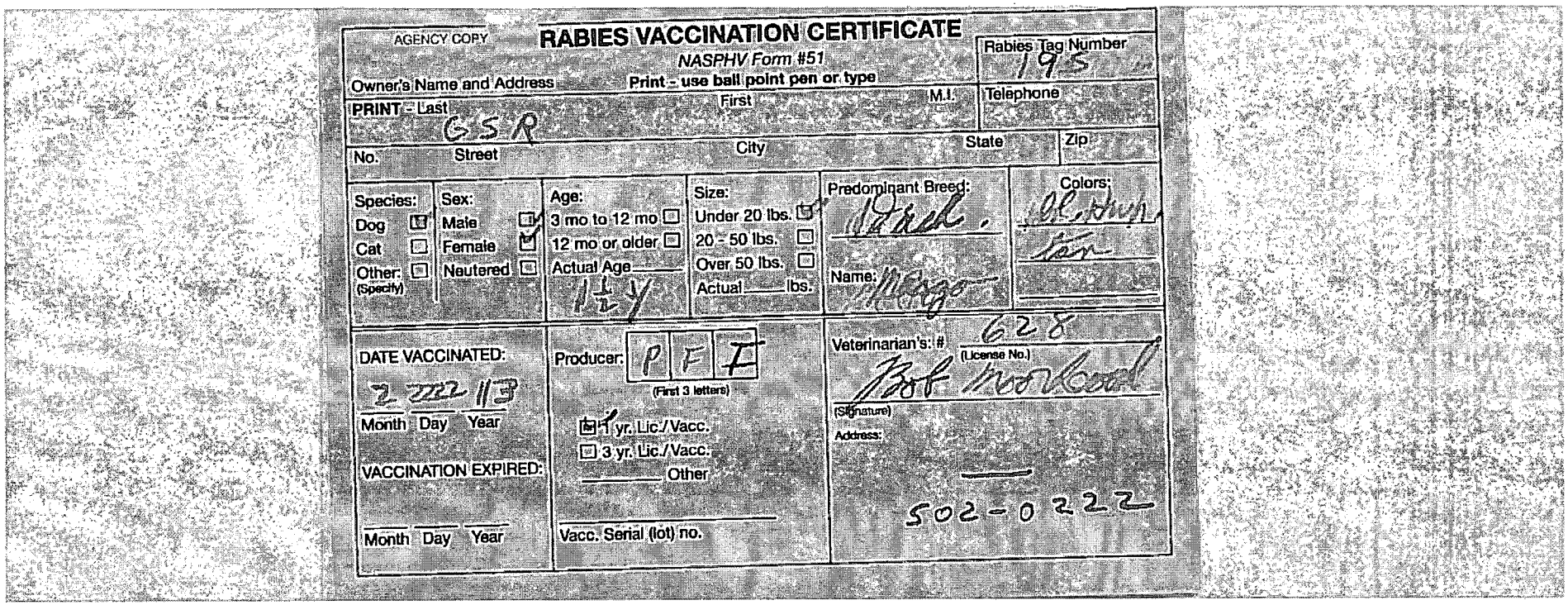
Veterinarian's #: 628 (License No.)

Robt Monfort (Signature)

Address:

502-0222

459



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 195

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☒	Shep.	Lt. brn.
Cat ☐	Female ☑	12 mo or older ☐	20 - 50 lbs. ☐		tan
Other: (Specify) ☐	Neutered ☐	Actual Age 1½ y	Over 50 lbs. ☐	Name: Mazo	
			Actual ___ lbs.		

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: ___ ___ ___ (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
___ Other

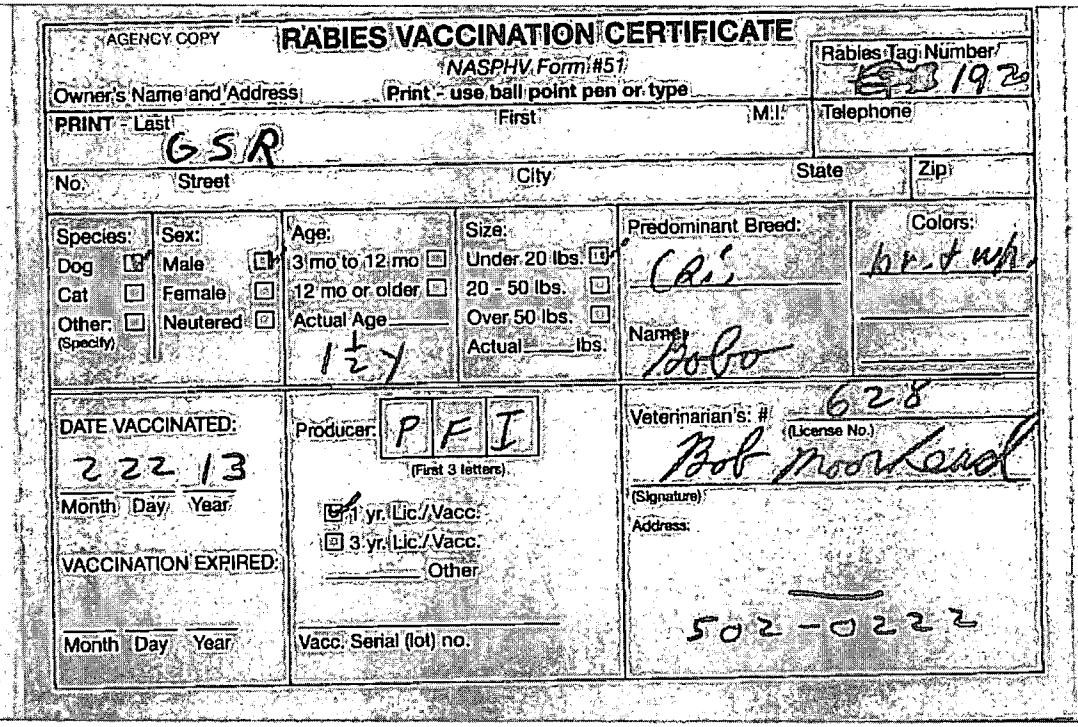
Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

(Signature)

Address:

502-0222



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: E3192

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	Chi's	br & wh
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: (Specify) ☐	Neutered ☐	Actual Age 1½ y	Over 50 lbs. ☐	Name: Bobo	
			Actual ____ lbs.		

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

____ Other

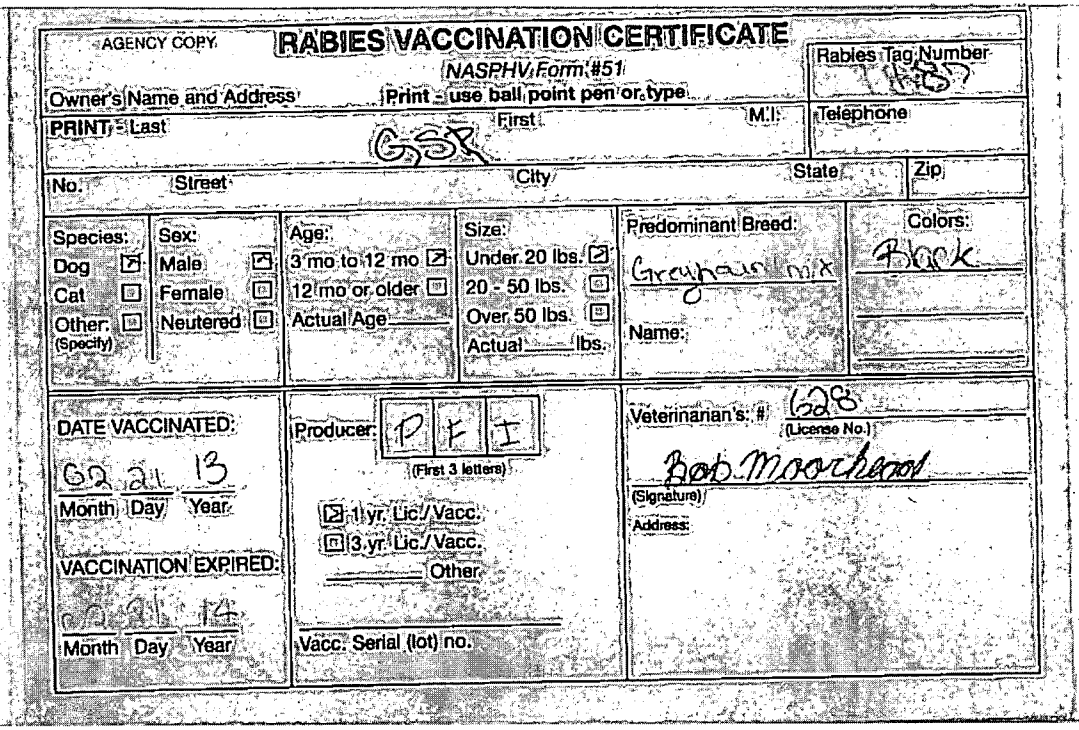
Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorland (Signature)

Address:

502-0222



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 1637

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First: | M.I. | Telephone:

No. | Street | City | State | Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☐	3 mo to 12 mo ☒	Under 20 lbs. ☒	Greyhound mix	Black
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other (Specify) ☐	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 02 21 13 (Month Day Year)

VACCINATION EXPIRED: 02 21 14 (Month Day Year)

Producer: PFI (First 3 letters)

☒ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

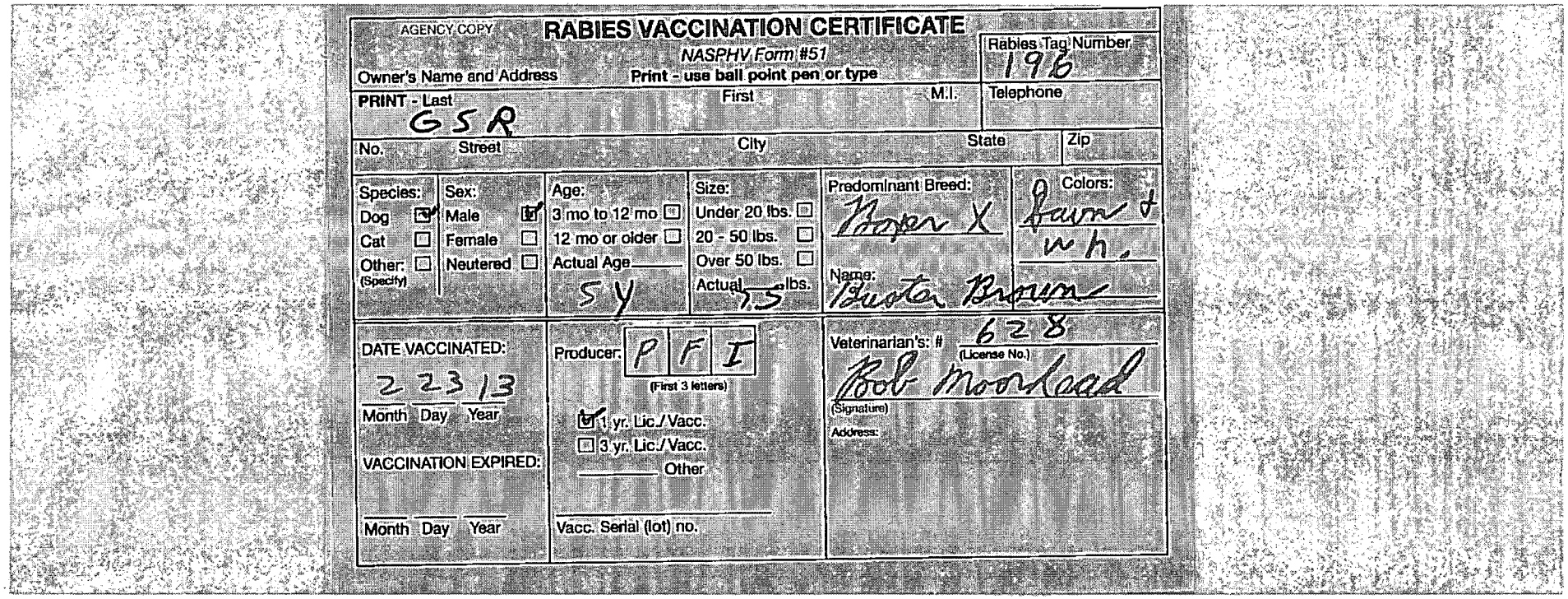
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 198

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	Boxer X	fawn & wh.
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: (Specify) ☐	Neutered ☐	Actual Age 5 Y	Over 50 lbs. ☐ Actual 75 lbs.	Name: Buster Brown	

DATE VACCINATED: 2 23 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

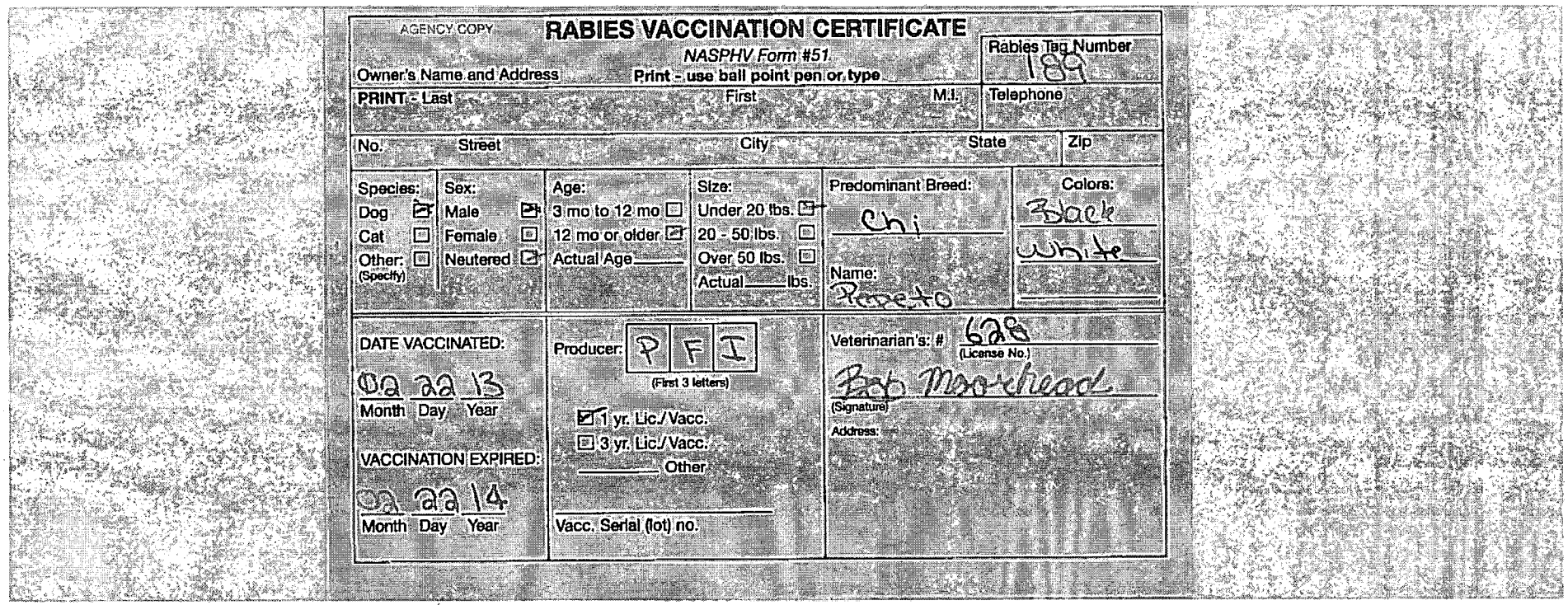
_____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 189

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: First: M.I.: Telephone:

No.: Street: City: State: Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Chi	Black
Cat ☐	Female ☐	12 mo or older ☑	20 - 50 lbs. ☐		White
Other: (Specify) ☐	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: Peppito	
			Actual ____ lbs.		

DATE VACCINATED: 02 22 13 (Month Day Year)

VACCINATION EXPIRED: 02 22 14 (Month Day Year)

Producer: P F I (First 3 letters)

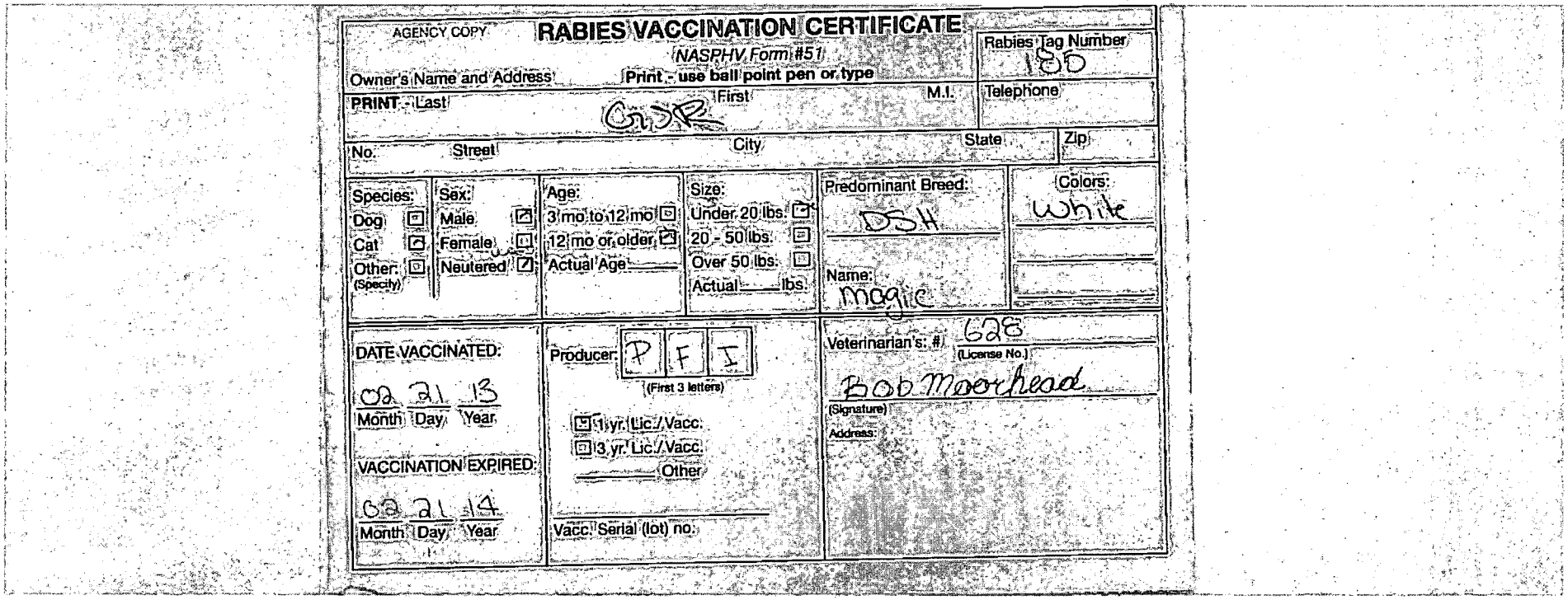
☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorehead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 185

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GJR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo. to 12 mo. ☐	Under 20 lbs. ☐	DSH	White
Cat ☐	Female ☐	12 mo. or older ☐	20 - 50 lbs. ☐		
Other: (Specify) ☐	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: magic	
			Actual ____ lbs.		

DATE VACCINATED: 02 21 13 (Month Day Year)

VACCINATION EXPIRED: 02 21 14 (Month Day Year)

Producer: P F I (First 3 letters)

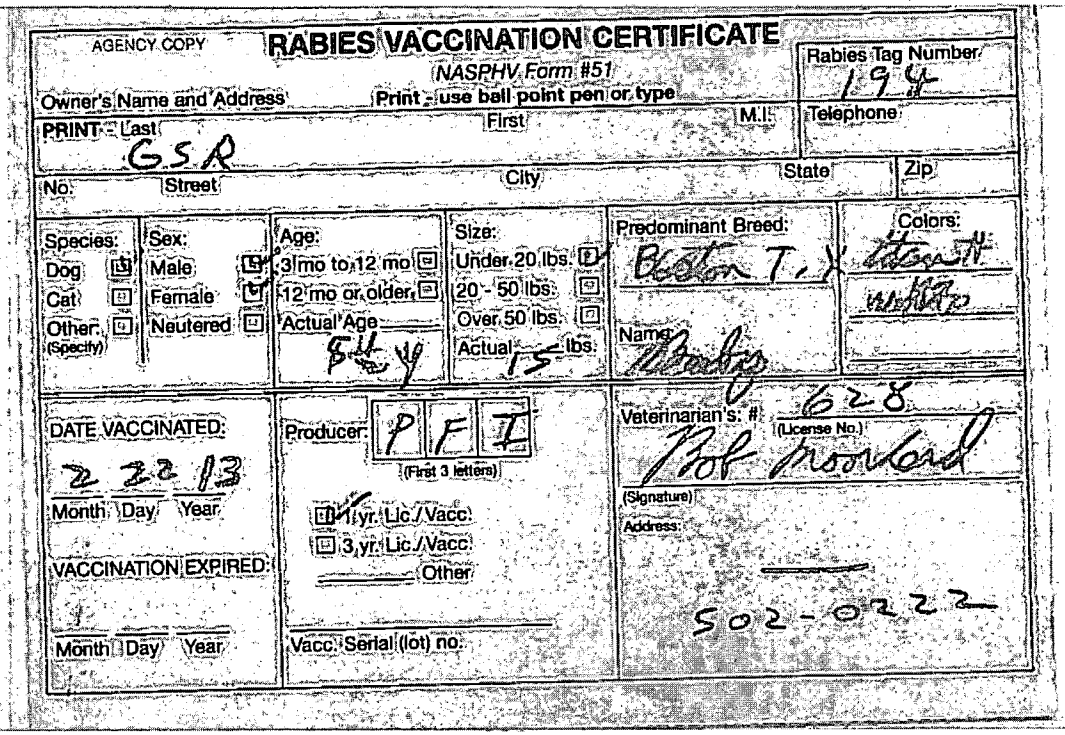
☐ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.:

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 194

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species: Dog [X] Cat [ ] Other (Specify) [ ]

Sex: Male [X] Female [ ] Neutered [ ]

Age: 3 mo to 12 mo [ ] 12 mo or older [ ] Actual Age: 5 4 y

Size: Under 20 lbs. [X] 20 - 50 lbs. [ ] Over 50 lbs. [ ] Actual 15 lbs.

Predominant Breed: Boston T. X

Colors: Brown White

Name: Bentley

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: P F T (First 3 letters)

[X] 1 yr. Lic./Vacc.

[ ] 3 yr. Lic./Vacc.

_____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Woodard (Signature)

Address:

502-0222

AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 191

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Aic	tan
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		white
Other: (Specify) ☐	Neutered ☑	Actual Age 1½ y	Over 50 lbs. ☐	Name: Bear	
			Actual ____ lbs.		

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

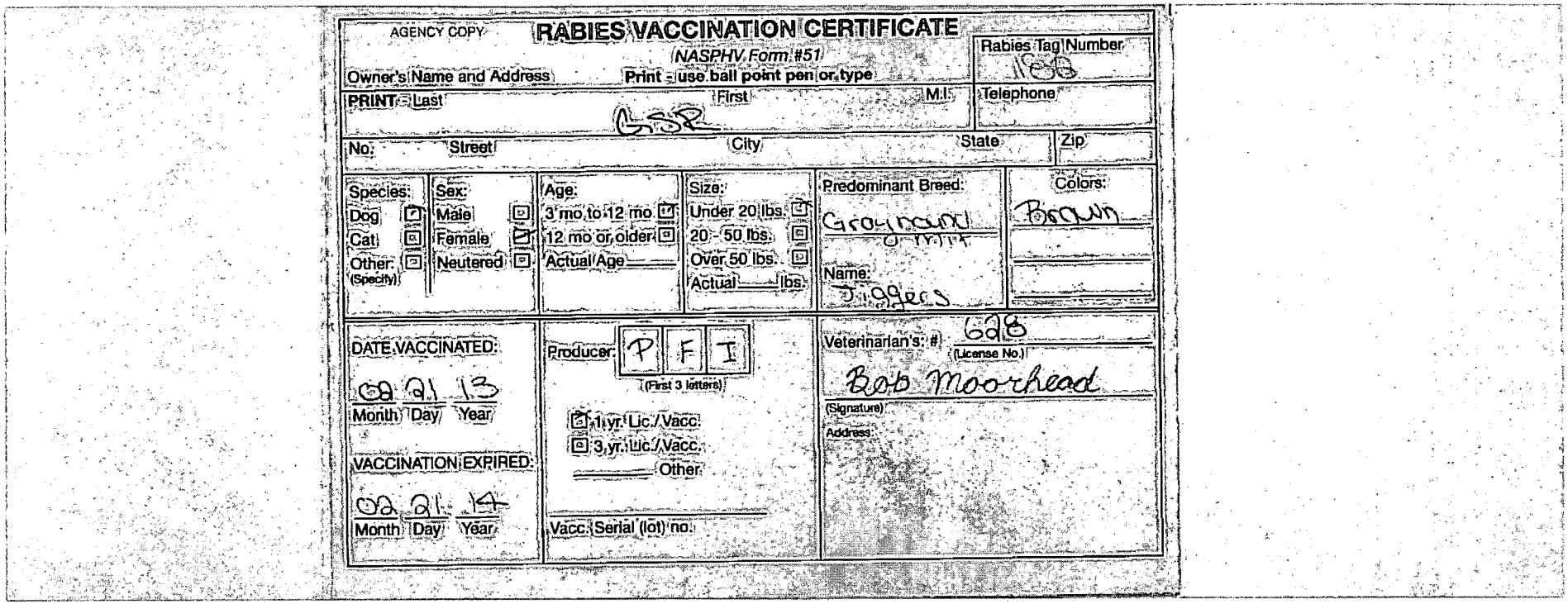
Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Woodhead (Signature)

Address:

502-0222



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 168

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First: | M.I. | Telephone:

No: | Street: | City: | State: | Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo. to 12 mo. ☑	Under 20 lbs. ☑	Greyhound	Brown
Cat ☐	Female ☑	12 mo. or older ☐	20 - 50 lbs. ☐		
Other ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Diggers	
			Actual ____ lbs.		

DATE VACCINATED: 08 21 13 (Month Day Year)

VACCINATION EXPIRED: 08 21 14 (Month Day Year)

Producer: P F I (First 3 letters)

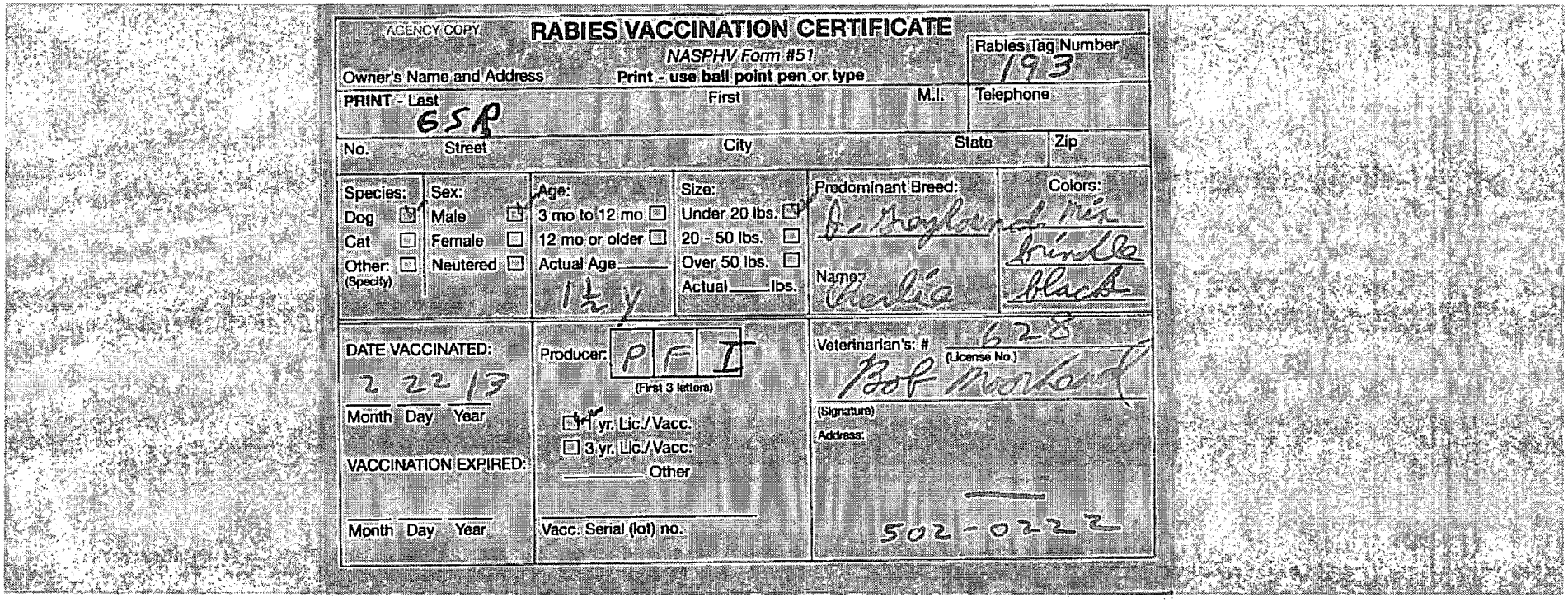
☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.:

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 193

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSP | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Lg Shepherd Mix	Brindle Black
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age 1½ Y	Over 50 lbs. ☐	Name: Cecilia	
			Actual ___ lbs.		

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

___ Other

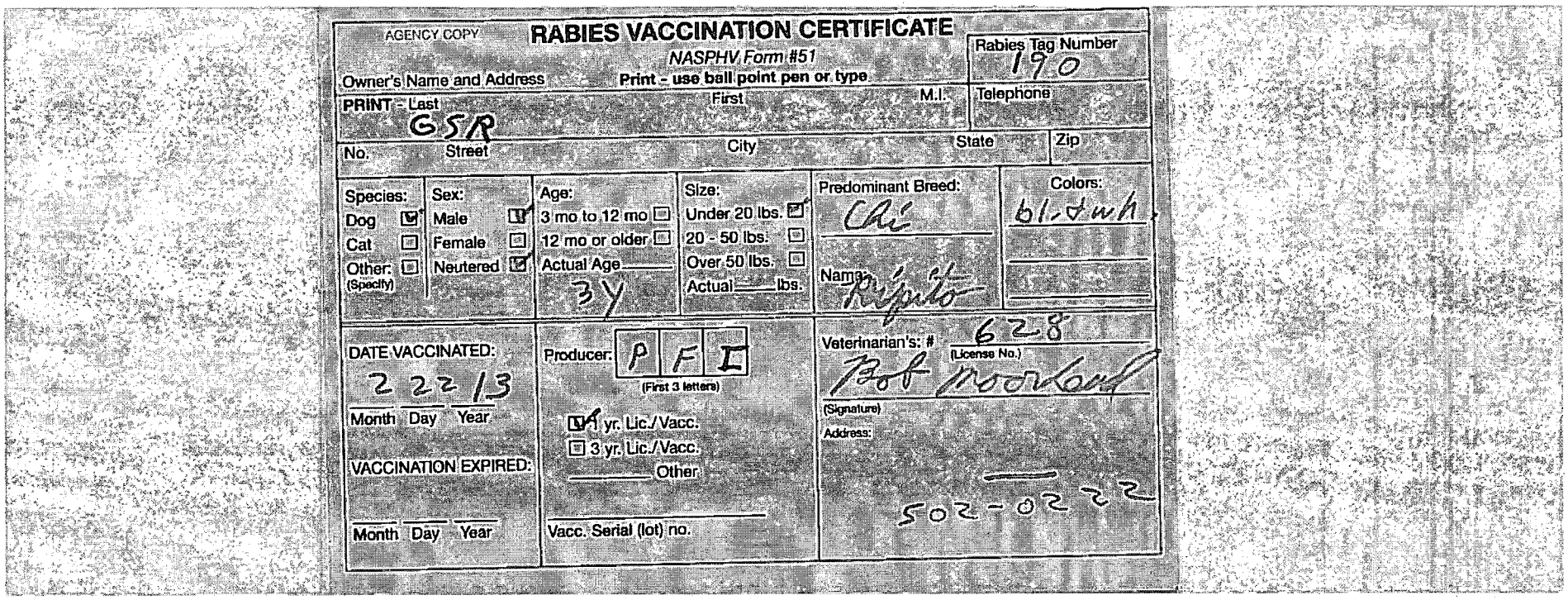
Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Morkard (Signature)

Address:

502-022-2



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 190

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☑	Chi	bl. & wh.
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐	Name: Rufus	
Other: ☐ (Specify)	Neutered ☑	Actual Age 3 Y	Over 50 lbs. ☐		
			Actual ____ lbs.		

DATE VACCINATED: 2 22 13 (Month Day Year)

VACCINATION EXPIRED: ____ ____ ____ (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

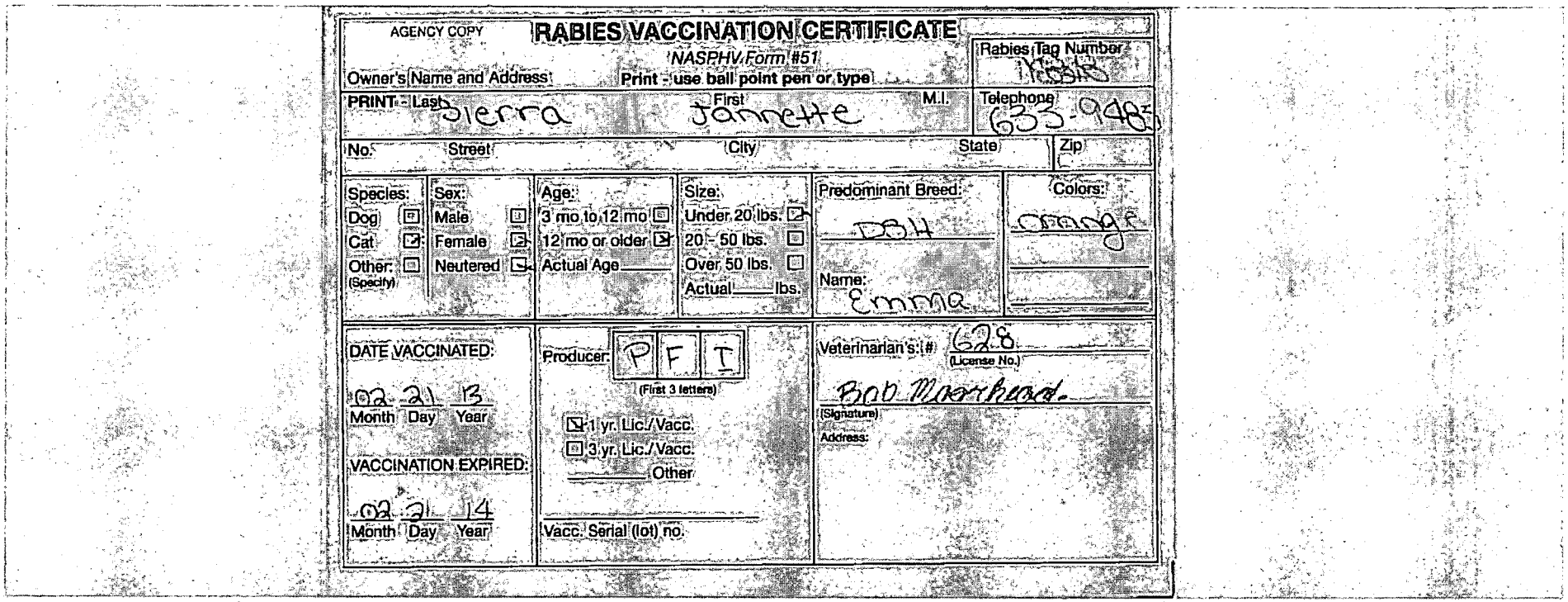
Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Woodland (Signature)

Address: —

502-022-2



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address: Print - use ball point pen or type

Rabies Tag Number: 1K5R

PRINT - Last: Sierra First: Jannette M.I.

Telephone: 635-9485

No. Street City State Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☒	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☒	DSH	orange
Cat ☐	Female ☒	12 mo or older ☒	20 - 50 lbs. ☐	Name: Emma	
Other: (Specify) ☐	Neutered ☒	Actual Age ____	Over 50 lbs. ☐		
			Actual ____ lbs.		

DATE VACCINATED: 02 21 13 (Month Day Year)

VACCINATION EXPIRED: 02 21 14 (Month Day Year)

Producer: P F T (First 3 letters)

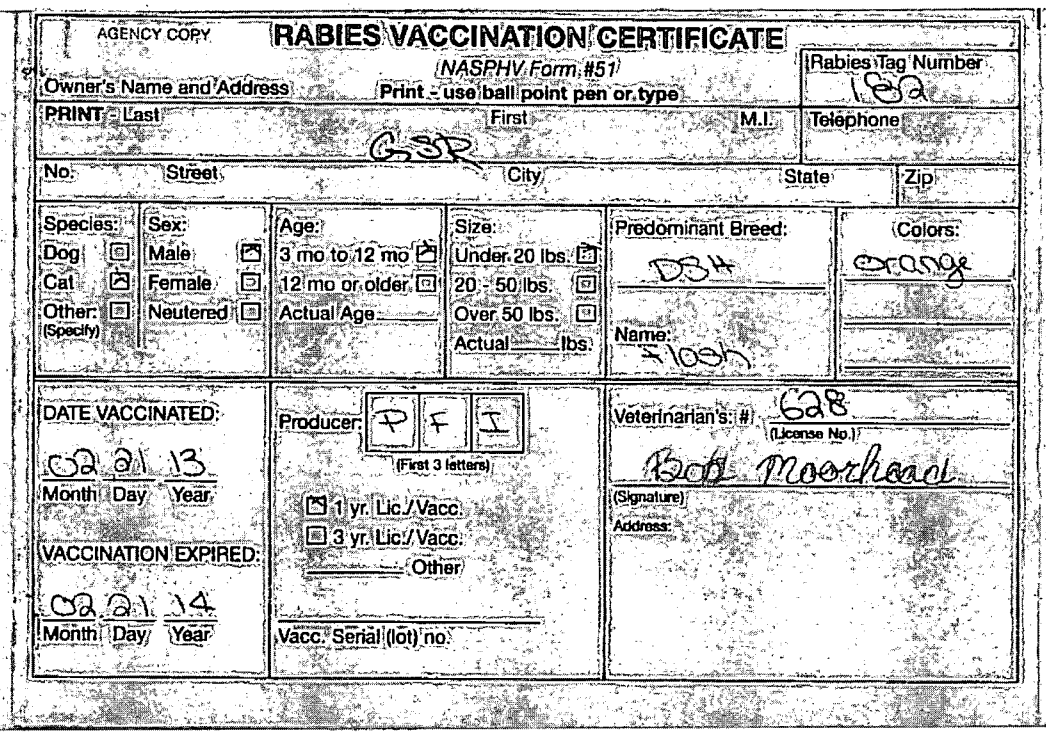
☒ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — Print - use ball point pen or type

Rabies Tag Number: 1852

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☒	3 mo to 12 mo ☒	Under 20 lbs. ☒	DSH	orange
Cat ☒	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other: (Specify) ☐	Neutered ☐	Actual Age	Over 50 lbs. ☐	Name: Posh	
			Actual ___ lbs.		

DATE VACCINATED: 02 21 13 (Month Day Year)

VACCINATION EXPIRED: 02 21 14 (Month Day Year)

Producer: P F I (First 3 letters)

☒ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

___ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:

AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — Print - use ball point pen or type

Rabies Tag Number: 183

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo. to 12 mo. ☐	Under 20 lbs. ☐	D.H	Gray
Cat ☑	Female ☐	12 mo. or older ☐	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☐	Actual Age _____	Over 50 lbs. ☐	Name: Nitro	
			Actual _____ lbs.		

DATE VACCINATED: 12 / 2 / 13 (Month / Day / Year)

VACCINATION EXPIRED: 12 / 14 (Month / Day / Year)

Producer: P F I (First 3 letters)

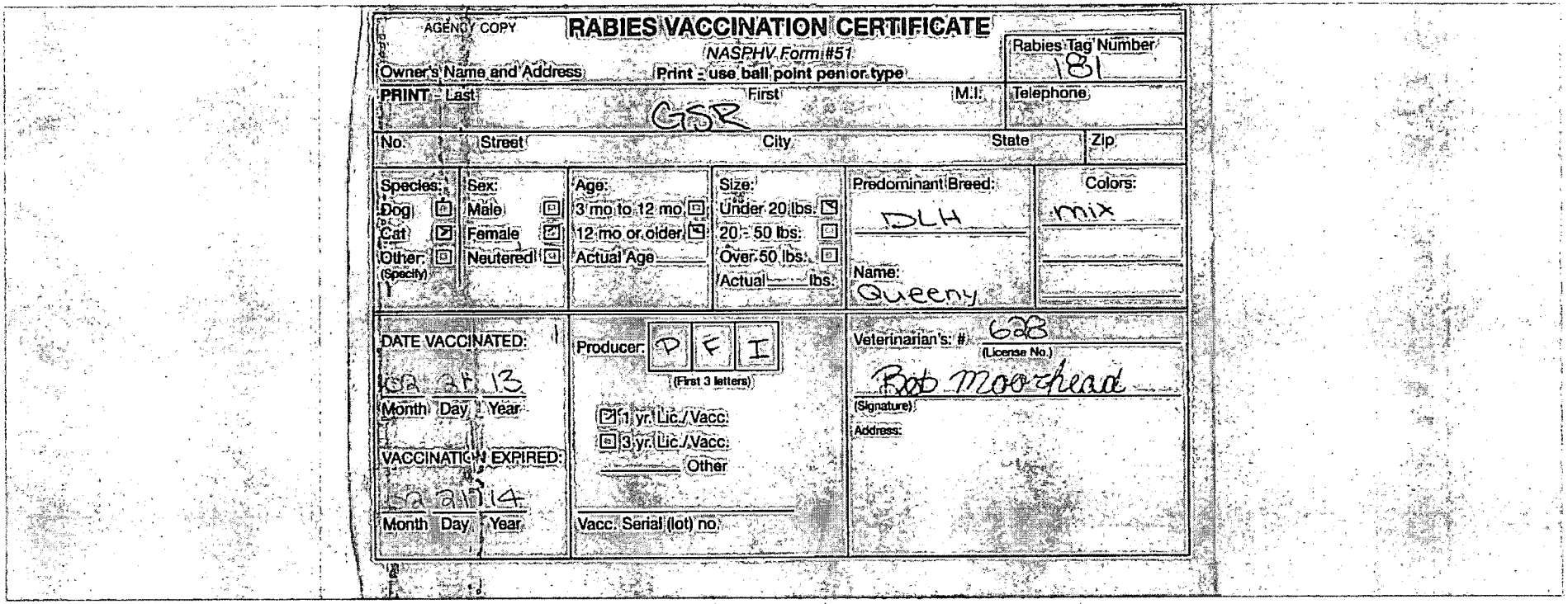
☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
_____ Other

Vacc. Serial (lot) no.:

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 181

Owner's Name and Address

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☒	DLH	mix
Cat ☒	Female ☒	12 mo or older ☒	20 - 50 lbs. ☐		
Other ☐ (Specify)	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Queeny	
			Actual ____ lbs.		

DATE VACCINATED: 5 2 13 (Month Day Year)

VACCINATION EXPIRED: 5 2 14 (Month Day Year)

Producer: P F I (First 3 letters)

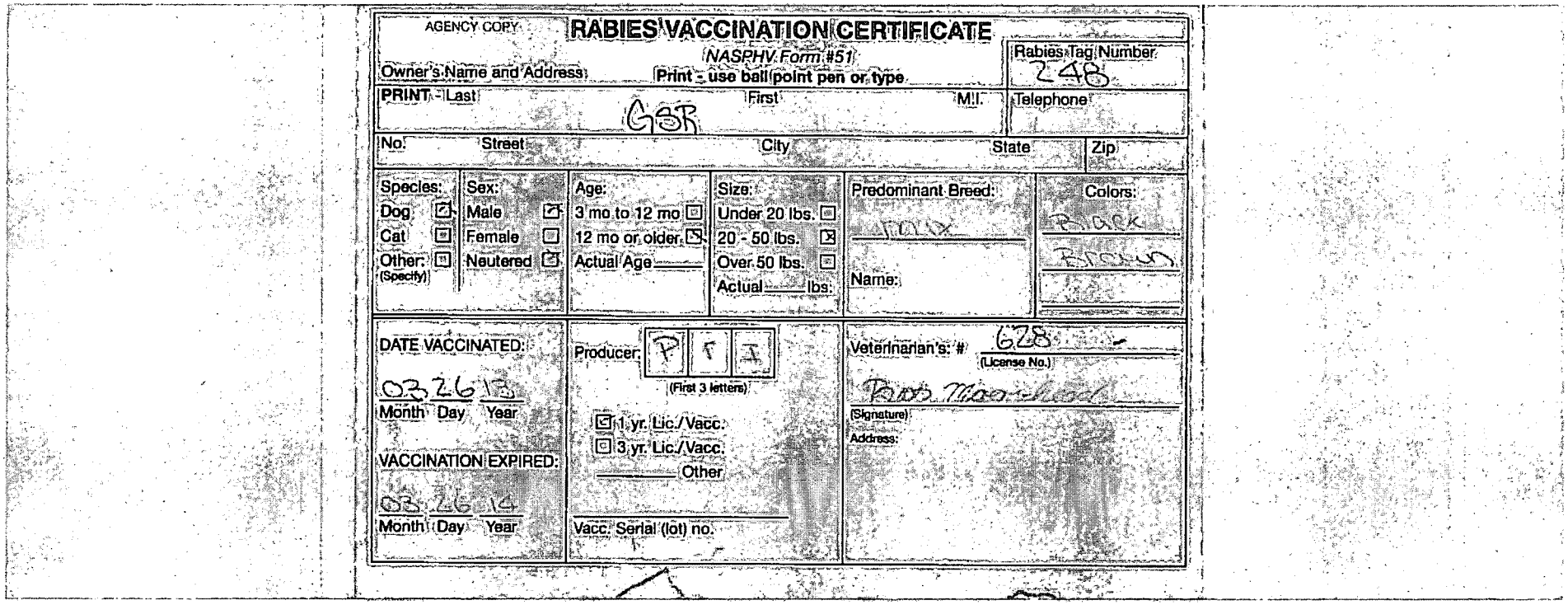
☒ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Owner's Name and Address:

Rabies Tag Number: 248

PRINT - Last: GSR | First | M.I.

Telephone:

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs. ☐	LAB X	BLACK
Cat ☐	Female ☐	12 mo or older ☒	20 - 50 lbs. ☒		BROWN
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name:	
			Actual ____ lbs.		

DATE VACCINATED: 03 26 13 (Month Day Year)

VACCINATION EXPIRED: 03 26 14 (Month Day Year)

Producer: P T I (First 3 letters)

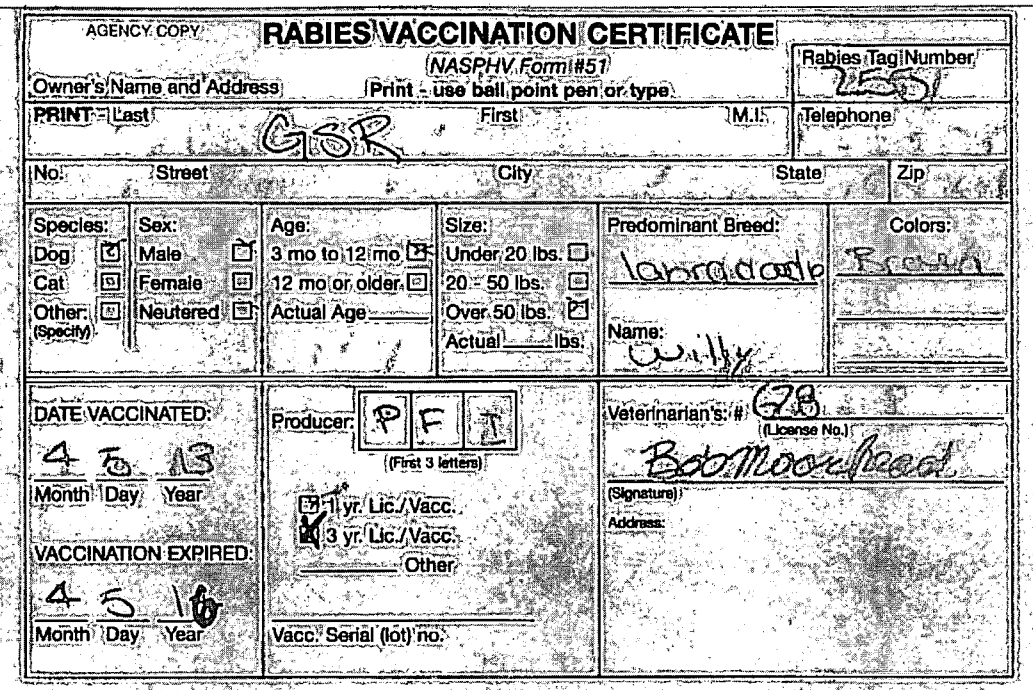
☑ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Ron Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 2551

Owner's Name and Address

PRINT - Last: GSR First: M.I.

Telephone:

No: Street: City: State: Zip:

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☑	Under 20 lbs. ☐	labradoodle	Brown
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs. ☐		
Other (Specify) ☐	Neutered ☐	Actual Age ____	Over 50 lbs. ☑	Name: Willy	
			Actual ____ lbs.		

DATE VACCINATED: 4 (Month) 5 (Day) 13 (Year)

VACCINATION EXPIRED: 4 (Month) 5 (Day) 16 (Year)

Producer: PFT (First 3 letters)

☐ 1 yr. Lic./Vacc.

☒ 3 yr. Lic./Vacc.

____ Other

Vacc. Serial (lot) no.:

Veterinarian's #: 628 (License No.)

Bob Moorhead (Signature)

Address:

AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 009

Owner's Name and Address: GSR

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo. to 12 mo. ☐	Under 20 lbs. ☐	Pug	Black
Cat ☐	Female ☐	12 mo. or older ☑	20 - 50 lbs. ☐		
Other: ☐ (Specify)	Neutered ☑	Actual Age ____	Over 50 lbs. ☐	Name: Cooper	
			Actual ____ lbs.		

DATE VACCINATED: 12 06 14 (Month Day Year)

VACCINATION EXPIRED: 12 06 15 (Month Day Year)

Producer: P F I (First 3 letters)

☑ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

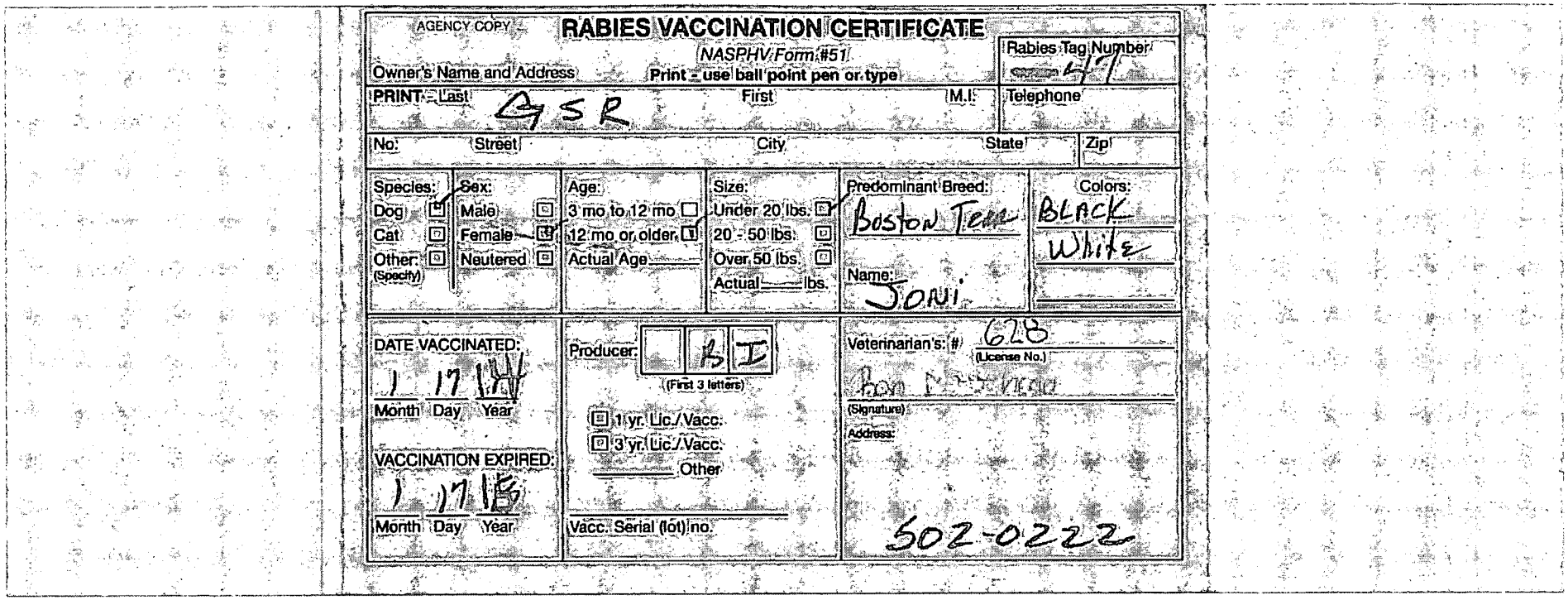
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

Eb Moorhead (Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: [illegible] 47

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First | M.I. | Telephone

No: | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo to 12 mo ☐	Under 20 lbs. ☑	Boston Terr	BLACK
Cat ☐	Female ☑	12 mo or older ☑	20 - 50 lbs. ☐		White
Other (Specify) ☐	Neutered ☐	Actual Age ____	Over 50 lbs. ☐	Name: Joni	
			Actual ____ lbs.		

DATE VACCINATED: 1 17 14
Month Day Year

VACCINATION EXPIRED: 1 17 16
Month Day Year

Producer: [ ] [B] [I]
(First 3 letters)

☐ 1 yr. Lic./Vacc.
☐ 3 yr. Lic./Vacc.
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628
(License No.)

Ron [illegible] VMD
(Signature)

Address:

502-0222

AGENCY COPY GSR

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Print - use ball point pen or type

Rabies Tag Number: 391

Owner's Name and Address

PRINT - Last | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☐	3 mo. to 12 mo. ☐	Under 20 lbs. ☐	Sharpei/Lab	Tan
Cat ☐	Female ☐	12 mo. or older ☑	20 - 50 lbs. ☐		
Other (Specify) ☐	Neutered ☑	Actual Age ____	Over 50 lbs. ☑	Name: Rocky	
			Actual ____ lbs.		

DATE VACCINATED: 11 25 14 (Month Day Year)

VACCINATION EXPIRED: 11 25 17 (Month Day Year)

Producer: BI (First 3 letters)

☐ 1 yr. Lic./Vacc.

☑ 3 yr. Lic./Vacc. ✓

____ Other

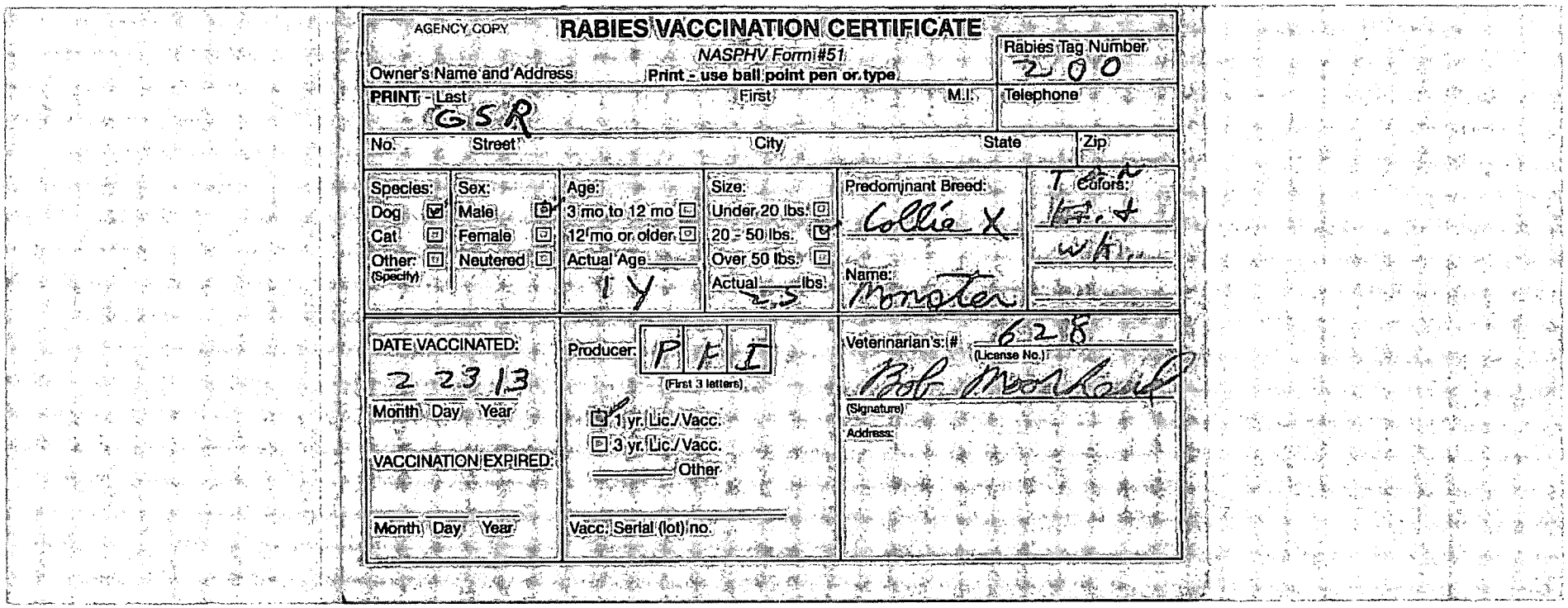
Vacc. Serial (lot) no.:

Veterinarian's: # 628 (License No.)

Bob Moorhead (Signature)

Address: 864 502 0222

479



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Rabies Tag Number: 200

Owner's Name and Address — Print - use ball point pen or type

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☑	Male ☑	3 mo to 12 mo ☐	Under 20 lbs: ☐	Collie X	T&W
Cat ☐	Female ☐	12 mo or older ☐	20 - 50 lbs: ☑		
Other ☐ (Specify)	Neutered ☐	Actual Age: 1 Y	Over 50 lbs: ☐	Name: Monster	
			Actual: 25 lbs		

DATE VACCINATED: 2 23 13 (Month Day Year)

VACCINATION EXPIRED: (Month Day Year)

Producer: PFI (First 3 letters)

☑ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

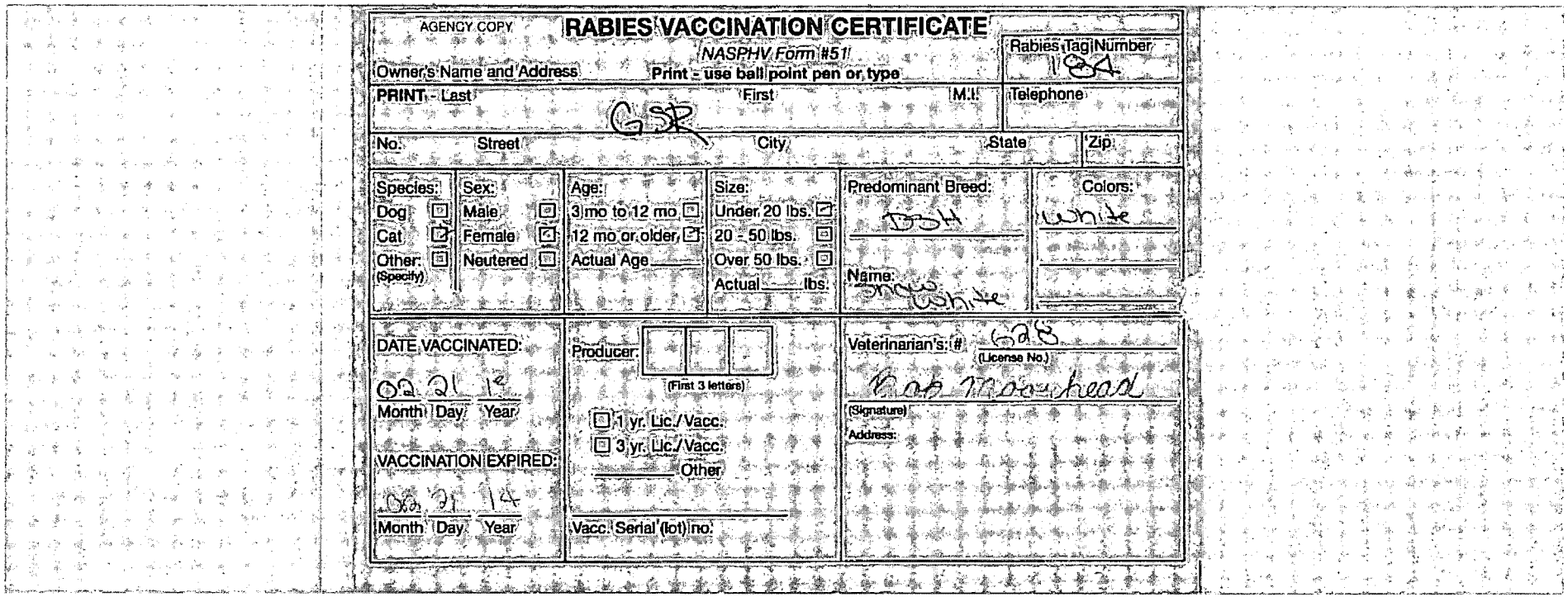
____ Other

Vacc. Serial (lot) no.

Veterinarian's: # 628 (License No.)

(Signature)

Address:



AGENCY COPY

RABIES VACCINATION CERTIFICATE

NASPHV Form #51

Owner's Name and Address — Print - use ball point pen or type

Rabies Tag Number: 184

PRINT - Last: GSR | First | M.I. | Telephone

No. | Street | City | State | Zip

Species:	Sex:	Age:	Size:	Predominant Breed:	Colors:
Dog ☐	Male ☐	3 mo to 12 mo ☐	Under 20 lbs ☑	DSH	White
Cat ☑	Female ☐	12 mo or older ☑	20 - 50 lbs ☐		
Other: (Specify) ☐	Neutered ☐	Actual Age ____	Over 50 lbs ☐	Name: Snow White	
			Actual ____ lbs:		

DATE VACCINATED: 02 21 14 (Month Day Year)

VACCINATION EXPIRED: 02 21 17 (Month Day Year)

Producer: ___ ___ ___ (First 3 letters)

☐ 1 yr. Lic./Vacc.

☐ 3 yr. Lic./Vacc.

_____ Other

Vacc. Serial (lot) no.:

Veterinarian's #: 683 (License No.)

Rob Woodhead (Signature)

Address: