Witness: Eloise Anderson

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Day 1 of 2 for this witness

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Direct Examination by David Harris

HARRIS: I'll give you a second to get adjusted there.

ANDERSON: Okay.

HARRIS: All right. Ms. Anderson, do you have any connection with the Contra Costa County Sheriff's Department search and rescue?

ANDERSON: I do. I'm a member of the Contra Costa County Sheriff's Search and Rescue, a dog handler for their team.

HARRIS: Let me go through this a little bit. Do you have any background or education and training in the area of dealing with dogs?

ANDERSON: In dealing with dogs, I've been training dogs in a variety of disciplines for about 20 years now.

HARRIS: Going back 20 years ago, how, how was it that you got started in training dogs?

ANDERSON: I started training dogs in obedience competition, obedience. I worked for Arydith Obedience School and trained different levels of obedience. I also trained and put AKC titles on my own dogs in obedience and AKC hunt test trials.

HARRIS: Let me go back a little bit. AKC obedience test and hunt trials. What is an AKC obedience test?

ANDERSON: An AKC obedience is a dog show that the American Kennel Club allows you to title dogs, to put a title after a dog's name, once they have met specific requirements. At the dog show they must go through a series of exercises, and then they, when they have done that three times, with a specific score of 170 to 200, 200 being perfect, they are allowed then to put a title after the name of the dog.

HARRIS: And what was the second one, the hunt test?

ANDERSON: Hunt tests are another AKC competition where they simulate hunting conditions. And, again, you have to meet certain criteria. And, again, you're allowed to put a title after the dog's name.

HARRIS: Now, did you, you mentioned that there were some type of school or program that you were an instructor or trainer with?

ANDERSON: I was one of the trainers for Arydith Obedience School in Moraga, California. Started out training novice-level dogs, moved to what we call the open level, which is kind of like

a master's degree, and when I finished there I was training utility level, which is basically like a Ph.D. To put it in human terms.

HARRIS: Did you, did you, are you still working for that particular company?

ANDERSON: I do not work for them. I switched in 1990, decided that dog showing wasn't giving me the kind of satisfaction I really wanted and switched to search and rescue.

HARRIS: Now, can you give us your background in search and rescue with dogs?

ANDERSON: I've been training dogs since 1990 in search and rescue. I have trained a series of dogs in area search, which is a dog that is trained to go out, clear a specific given area within specific parameters and tell me about any live human scent that may be out there. I've also trained cadaver dogs, who are trained to go out and indicate any dead person that may be out there, or any residual from, from a decomposed human. I've also trained evidence dogs and trailing dogs.

HARRIS: Now, to go through this particular process, now, you're telling us about your background and training, you've been training other people's dogs. Have you also trained your own dogs?

ANDERSON: Yes, I have trained my own dogs, and in search and rescue I've assisted other people in training their dogs. But I've also trained all of my own dogs.

HARRIS: And how many dogs do you have?

ANDERSON: Do I have at this current point in time?

HARRIS: Yes. For search and rescue use.

ANDERSON: For search and rescue I have five dogs right now.

HARRIS: And what are the disciplines that you have?

ANDERSON: I have two cadaver dogs, I have a cadaver dog in training, I have a trailing dog, and I have a bomb dog in training.

HARRIS: I'm sorry, what was the last one?

ANDERSON: Bomb dog. Explosives detection dog.

HARRIS: Now, with regards to your background in training dogs, do you, is it just something you can do? Or are there other members out there in the professional community that also train dogs that you've been associated with?

ANDERSON: We generally work within our own team. But we have team members who are not necessarily a part of our dog resource that come out and will aid us. Will hide for the dogs, will help us set up problems for the dogs. And then we train within our Contra Costa group.

HARRIS: I'm going to come back to that in a minute, but just something that you're talking about. You're saying that you would hide from a dog. Is that part of the process of training dogs, where you get somebody to go out someplace and hide and then try and find that individual?

ANDERSON: That's correct. With both area search dogs and the trailing dogs, we will set up a problem for them. We try to set up the problem that is appropriate for their level of training. And then we work them through that problem. If you have a dog that is working on specific issues, if the dog is distracted, an area search dog that maybe gets distracted by the cows or an area search dog that gets distracted by ground squirrels, then we'll work them through areas like that and correct, as appropriate, to make them focus, to help them to focus on what they need to be working on.

HARRIS: We'll come back to the training, but what I was primarily getting at, is there, are there associations of individuals that work together or have kind of an association with any of these

particular groups, and primarily with search and rescue dogs?

ANDERSON: There are a variety of different groups that have search and rescue dogs. There's WOOF, which is Wilderness Finders. There's CARDA, which is California Rescue Dog Association. There's Monterey Bay Search Dogs, and then there are several counties, Alameda County and Contra Costa County, to name just a couple, that also have search and rescue teams.

HARRIS: Now, with regards to your connection with the Contra Costa County Sheriff's Department Search and Rescue team, can you become a member of the search and rescue team if you don't have a dog?

ANDERSON: That is correct. There are a variety of disciplines that we have within the search and rescue team. We have people that are ground searchers, we have people that are good with GPS, we have a variety of people. We have people that are good in search management. So there's lots of areas. We have a mountain bike group. We have resources, many resources within the team.

HARRIS: Now, with regards to those that are involved with the K 9 handling, can you just walk up to the sheriff's department and say Hey, I've got a dog and I want to be part of your search and rescue team?

ANDERSON: It's not quite that simple. If you're interested in the search and rescue team, we have an academy that you need to go through prior to participating with your dog. And then during that period we will also evaluate the dog to see if the dog has the drive and the desire to do search and rescue.

HARRIS: And when you say looking, evaluating the dog to see if it has that drive or desire, what are you talking about?

ANDERSON: When we pick a search and rescue dog, we pick dogs that have specific traits. We pick dogs, we try to pick dogs from specific groups, like the hunting group dogs. Dog breeds are broken up into groups. You have your hunting dog group, you have your working dog groups. Your hunting dog group has Labradors, Golden Retrievers, dogs of that nature. Your herding group has German Shepherds, Border Collies, Australian Shepherds, dogs, dogs like that. Your working group has your Dobermans and your Rottweilers and dogs of that nature. We try to pick dogs primarily from those groups because those are the dogs that have the basic breeding to do the work. They've been bred to work through the years, and so we look for dogs that have that desire and instinct to work.

HARRIS: And as you go through this process, you're talking about this, so this is something that the search and rescue team, other members kind of evaluate a new person that comes on board?

ANDERSON: Basically the people that are, that, kind of the head trainers of the dog resource of the search and rescue team are the ones that evaluate the dogs.

HARRIS: And how long have you been with search and rescue?

ANDERSON: I've been with the Contra Costa County team since 1991.

HARRIS: And in that entire time that you have been there, since 91, have you been with them in a K-9 handling capacity?

ANDERSON: I have.

HARRIS: And I want to specifically talk about the trailing dog that you mentioned. What is the name of the trailing dog?

ANDERSON: Trimble is the name of the trailing dog.

HARRIS: And what type of dog is Trimble?

ANDERSON: Trimble is a Labrador.

HARRIS: I'd like to have marked next in order a photograph.

JUDGE: A picture of Trimble, okay. That would be 209. A photo of Trimble.

HARRIS: Ms. Anderson, let me show you what's been marked as 209. Do you recognize that?

ANDERSON: Yes. That's Trimble.

HARRIS: Now, you were telling us that Trimble is, is a Labrador. Is there, I'll express my ignorance here about dogs. Is there a difference between Labradors?

ANDERSON: Trimble is what we call a hunting or working Labrador. She comes from strictly working lines. All of her ancestors for at least five generations back are field trial lines. They do not show in the show ring. They'd probably get laughed out of the show ring, but they are trained and titled in hunt tests and field trials. Her father is a titled field trial champion.

HARRIS: Now, you're talking about the hunt test again. Is, is, what really is the hunt test?

ANDERSON: It's basically seeing that the dog can retrieve in a hunting scenario. They have to do what would be called a land retrieve, which is they throw a bumper, or something of that nature. They may shoot guns from the line. The line is where the dog and the handler are sitting. The dog must remain steady at the handler's side until sent to retrieve. And they do that in a variety of ways. They will set up multiple retrieves where the dog must memorize each bumper that falls and then retrieve them in reverse order. They also have to do water retrieves.

HARRIS: Now, when you, you're talking about, I guess the term would be the pedigree of Trimble?

ANDERSON: Correct.

HARRIS: And as you get this, this puppy, does, I mean they start out just being a good dog? Or do they have to go through some process?

ANDERSON: We start training them from the day we get them. I actually bred Trimble. I have her mother, so I did a lot of pedigree research. Her mother is a certified search dog, and I did a lot of pedigree research before I decided who the sire was that I wanted. So she was bred specifically to work, specifically to do search and rescue. And we train them, she was being trained, introduced with very simple things, such as linoleum floors, loud noises, from the time her eyes were open.

HARRIS: When you say she was being trained with linoleum floors,

ANDERSON: She's being exposed to all sorts of, any, anything that she may encounter in an environment, she's exposed to. So that she has no fear of strange things that, that appear.

HARRIS: Why is that important?

ANDERSON: We don't want a dog that's going to be fearful. We want a dog that's going to be able to drive through, have the drive and the courage to drive through distractions, to, in a trailing dog situation, also, we want a dog that will actually drive through concerns from their handler. Say This is where the scent goes, this is where we're going, rather than being concerned about What's my handler doing, I better stop.

HARRIS: Now, you're saying that you started training Trimble since the time her eyes could open. Does it take a long time to train a trailing dog?

ANDERSON: It does take a long time to train a trailing dog. When you're in a trailing situation, you as the handler are not in control of the search. You have to trust that dog and you have to believe that dog. The dog has to have the drive to continue forward and say This is where we're going.

HARRIS: Now, with regard to your assignment with the search and rescue, is that a paid position?

ANDERSON: That is not a paid position.

HARRIS: Do you get reimbursed by the sheriff's department for all the time that you spend training these animals?

ANDERSON: No, we don't.

HARRIS: It's all volunteer time?

ANDERSON: It's all volunteer time.

HARRIS: When you start training the dog to become a trailing dog, can you take us through the process of how that works?

ANDERSON: We, once they're through their basic obedience, we do basic obedience with them. With the trailing dogs we do a lot less obedience, but we also do agility with them. We want them comfortable on different surfaces. We do socialization with them. We don't want them racing to some dog down the street. We want them to just drive on past that. We introduce them to a lot of different things. When we start laying their trailing foundation, we will actually start out with what we call puppy tracks, where we will lay a track in the grass, because that's the easiest for the dog to follow to start with. And we teach them to follow that track, footstep to footstep to footstep. That's a very basic foundation we develop. We don't do that particularly long because a trailing dog can't follow footstep to footstep to footstep over very, very difficult terrains, like asphalt roads, shopping malls, and things of that nature. Plus it's physically exhausting for the dog to go footstep to footstep to footstep. So we lay that foundation to teach them that that's where they're going and this is what they're going to get at the end, which is going to be their person. And we put a person at the end for them. We then graduate to what we call fire trails, where the person may drop their article, like a jacket, and run away screaming and yelling and making all sorts of noise, getting the dog very, very, very excited. We bring the dog up to the article. The instant their nose hits that article, we give them their command and we let them go to the person. And then from there we just increase the level of difficulty. We move to where they never see the person, they go on the faith that there's somebody out there, because that's the foundation that we've laid. And then we go to introducing turns, we go to introducing crossing sidewalks. We go to introducing crossing streets. We go to working strictly in an urban environment. We just start looking at what might they run into on a search that we may need to be prepared for. And so we try to lay the foundation, and, so that anything that we may encounter on a search would be something that is within our training parameters. We have done that, and we have done that successfully with the dog.

HARRIS: Now, the, the dog that we're talking about, Trimble that's up on the screen, 209, Trimble has gone through this process?

ANDERSON: Correct.

HARRIS: Now, you're telling us that there was kind of this basic obedience part. Did Trimble, I'm assuming, make it through that particular aspect?

ANDERSON: She did basic obedience, but I never put heavy obedience on her because I don't want her thinking that No matter what I do, I have to obey my handler. I want her to, I want, I've taught her her job, and I want her to do her job to my exclusion, if necessary.

HARRIS: And why is that?

ANDERSON: Because I don't know where the scent trail is, and if I'm working the search, I have to have the faith that my dog knows where the scent trail is. And we set these dogs up, we, if they make a mistake, we let them make a mistake sometimes. We will set up a training, and if we

know the trail just turned left and the dog goes straight, we may let them go straight. We want to see how long it takes for them to get an indication that they've lost the trail and what they do to give an indication that they've lost the trail. When you're on a search and you don't have a known trail, if I run my dog to the end of a trail and she tells me she's lost that trail, but she just went 15 feet beyond where the scent really stopped, when I go back and debrief at that search, I need to be able to say My dog lost this trail and here's where she lost the trail. Because if I can't tell them where my dog lost the trail, I'm not, I'm not a viable resource for the search team.

HARRIS: Now, as, you were talking about a couple of different things there, about letting them go out and that they've missed a turn, letting them go past that. What does that mean if they've missed a turn?

ANDERSON: If she's on her trail and her trail turns left, and I know her trail turns left, and she goes past that left turn, I may, or I may not, but if that is my goal for the day is to just start proofing her on corners and, and reading her, then I may let her go past that turn, and then I watch for her changes in body language and behavior that tells me she's lost her scent.

HARRIS: Let's talk about that. Obviously, again, not to be too obvious, but the dog can't tell you what's going on. How is it that you learn to determine the dog's behavior, what that means?

ANDERSON: With Trimble, when she's working what, what I would call kind of a static trail, in other words, it's not a completely fresh trail where you still may have scent moving around but it's a trail where the scent has pretty much settled down, she will line out. And the upper picture up there, that level head, tail up, tail up, may be up or down, depends upon whether you're at the beginning of a six mile hot trail or at the end of a six mile hot trail, but that level head, straightforward drive, that's on-trail. When she goes off of a trail, I can say probably within five to ten feet I know that she's gone off that trail because her head comes up, she'll look, start looking a little bit. She may, she may not, drop her nose, and then she'll turn and make eye contact with me and come back to my left side. And that is something I've actually trained her. You're out of trail, it's okay to come back and tell me you're out of trail. So I've trained the behavior, Come back to me, come to my left side.

HARRIS: I want to go back through some of the concepts you were talking about there. One of the terms that you used was "proofing." What is that?

ANDERSON: We'll set a dog up and give them different parameters. We may set a trail up where she has a person in the middle of her trail, a person that we call a decoy. A person that maybe she knows but was not the person she was scented on, and we may put that person, or more than one person like that, in the middle of her trail. She needs to drive past those people. Now, if she goes to them, because she knows them, sniffs them, wags her tail a little bit, that's fine. I don't, I don't care about that. What I want, but I want to see her go on by and drive to the person that she's been scented on. And we will proof them with giving her people that she knows and she likes. People that have been her subject before, and she is expected to drive past them to the person she's been scented on.

HARRIS: Now, when you're talking about this, this sounds like these are training exercises?

ANDERSON: These are training exercises, correct.

HARRIS: An, A. I was doing to say what we do is we may look for a weakness in the dog, and then train to that, put that dog in that situation.

HARRIS: Now, when you're going through this training process, so you started with the puppy steps that you were talking about, and then you went on to the fire trail, and extending that out to eventually the person's not there, and you were telling us about going to some of the other environments; do you always do these trails where you know where the person is at?

ANDERSON: No. We do do blind trails. And what we will do in a situation like that is we will have a person with us who knows exactly where the trail went, and then we, as the handler, will lay out the parameter: If she misses a corner, I want to know; if she misses a corner I don't want to know; if she misses a corner I'm going to stop her, I'm going to tell you where she missed the corner, and I want you to tell me Yes, that's right, No, that's wrong, things of that nature. So we do do blind trials with them. What we call blind trails, meaning neither the handler or the dog knows, well, the dog, hopefully, knows where the trail is. The handler does not know where the trail is.

HARRIS: And why do you set up training exercises like that?

ANDERSON: Because it's very easy to, it's more stressful, and the dog needs, for the handler, and the dog needs to deal with stress that may come from the handler, which is another reason why we don't get into a lot of heavy obedience. I want my dog to just brush me off if I start stressing, if I start worrying Why did she look down that road but she kept going straight. I want to be able to say Okay, she looked, but she kept going straight, so that's fine. And I don't want her to be worried about what I'm doing. I want her to do her job.

HARRIS: Now, when you're talking about setting up these training exercises, you've told us about how you eventually move the person out of sight, do you ever do any training in terms of time?

ANDERSON: Oh, so far as how old the trail is?

HARRIS: Yes.

ANDERSON: Yes. We, when you start out with a puppy, you build up very slowly. You may do a puppy trail that's fresh. As soon as the person gets to the end, you send the puppy. To 20 minutes, to an hour. And then as they get more experienced, and as we want to see what their limitations are, there are some dogs that excel at fresh trails. There are some dogs that excel at older trails. And we need to know what the dog's limitations are. So we have set up, excuse me, we have set up old, old trails. We've set up trails up to two weeks old. We've set up bicycle trails where she had no person walking. She had to work the scent that came off the person as they rode their bike. She's done two-week old bicycle trails. We've set up trails where it's excessively hot or has been very, very hot. Which has a negative impact on the scent, and we've worked her on trails on that. We've worked her on trails where it has rained cats and dogs between the time the trail was laid, and, and she ran the trail. And she was successful on that. She left all the cats and dogs alone.

HARRIS: Now, you're mentioning something earlier at the beginning of that, just to go back through some of these points again. Something about parameters. When you're talking about training parameters, what are you talking about?

ANDERSON: I'm talking about training parameters so far as, when I train a dog, I have parameters, because nothing that this dog does is really black and white. It tends to be shades of gray. But I have parameters that I look for when I want to be able to say This was a successful trail, this was not a successful trail. And I expect the trail, the way that she runs that trail, to fall within specific parameters. If she misses a turn, then I expect her, that's fine, if she misses a turn. I expect her to either come back and tell me, or to self-correct. And she will self-correct. She'll bring her head up. She'll look. She'll circle back around, and she may go back to where she lost the trail and pick up the turn. So there are specific parameters that I expect, based upon the way I've set up the trail, of performance. And if the trail does not fall within those parameters, then I want to go back and look at that trail. Was it set up so that she could not be successful on that trail? Were there variables that were put into that trail that I had not counted on that, that changed the parameters, where I didn't change the parameters because I wasn't aware of those variables.

HARRIS: Now, you've also mentioned something about some dogs are better on fresh trails, some dogs are better on older trails. Obviously dogs are not machines.

ANDERSON: Right.

HARRIS: So does each dog kind of have their own unique individual abilities?

ANDERSON: I think they all have a base line of abilities. I think some dogs are more sensitive to the scent, perhaps. Trimble is, excels on older trails. Trimble is, she does fresh trails, but she's a dog who likes to verify her trail. And she will go to the edge of her trail, if it's very fresh and the scent is still moving. So she actually is, lines out and is steadier on an older trail, because the scent has pretty much settled in and her scent picture is pretty consistent, versus a fresh trail where the scent picture may change within feet.

HARRIS: Now, you're also, something that you're saying there, I want to talk about that; dogs have good days and bad days?

ANDERSON: Oh, yes.

HARRIS: And is that something that, as you go through the training process, you learn to identify when a dog's having a problem?

ANDERSON: You do. You do. And you adjust for it. I have actually stopped trails where I thought she wasn't really doing her job. Either she was, was kind of checking out on me, or she missed a corner and didn't tell me about it. I have actually stopped her and put her up.

HARRIS: You were, you were talking about Trimble being, excelling at older trails. I want to go through the process of the training with the trailing dogs, specifically with Trimble. Do you teach these dogs, Trimble in particular, to go after the freshest or the most recent scent?

ANDERSON: Yes, we do.

HARRIS: So even if it might be two weeks old, you're still looking for something, so we're talking about freshest or recent, that's not really in terms of the time when it comes to these exercises?

ANDERSON: Correct. In fact, I think one of the two-week old trails she did, that trial was intercepted with a fresh scent from her subject, and she had to switch from the old trail to the fresh trail and go into her subject.

HARRIS: And why do you, why do you do that?

ANDERSON: Because when you're looking for somebody, they may wander. They may not necessarily walk in a straight line. If they're lost in a park, or something like that, and they go up a trail and then they come back to the trail, or they, they make a big loop around and come back and they cross their previous trail, a search is an emergency, and you don't need a dog or you don't want a dog that's going to go up and say Well, yeah, they went this way, but I'm going to go this way because they went this way first. You want that dog to go We make a right hand turn here. The old trail goes this way, the fresh trail goes this way. Because it's imperative that you get to that person as quickly as possible.

HARRIS: Why do dogs, or how do you train dogs to go to the freshest scent?

ANDERSON: We set them up with trails of that nature. We start with trails where it's a very, very old trail, and we cross it with a fresher trail so that it's very, very obvious. And then we bring the time line between the two trails, make it shorter and shorter and shorter until they actually can tell the difference between trails that are maybe just a couple of hours difference.

HARRIS: And do dogs seem to pick up on this, from your experience?

ANDERSON: From my experience, my dogs have always, have always picked up on it fairly readily. It doesn't seem to be a big issue. I've never had major training issues with, with doing that.

HARRIS: Now, is there kind of a basic instinct in them that helps with that particular area of, A. If you go back to the fact that dogs are prey animals, and prey animals have to hunt for their meals, a prey animal that can't follow the correct direction of a trail for prey is not going to last very long. If they go to the left and the prey went to the right, they're not going to find that meal. So it's kind of a natural selection process.

HARRIS: Now, as you go through this process of training them, so you told us about time and distance, recency or freshness of the trails, do you also start teaching them in terms of scent items or scent articles that you give them?

ANDERSON: I'm not quite sure,

HARRIS: That's probably a bad question.

ANDERSON: what you're asking.

HARRIS: In all of those trainings that you've been talking about, over time and distance, you are telling us that they are scented on a particular item?

ANDERSON: Correct.

HARRIS: So I want to talk about that.

ANDERSON: Correct.

HARRIS: How do you go through the process, when you're training a trailing dog, to scent onto a prominent scent?

ANDERSON: We will start them with the fire trails where they have a big scent article. That scent article for a puppy is a visual, more than anything, so that you're not having to force the dog to something that they don't understand. You have a big jacket there that's between them and the screaming person that just ran away from them. So they come up. As they drop their nose on that article, you give them their command. You give them that command once and only once, and then they run after the person. And then from there you just decrease the size of the scent article, because they learn that you are going to present them with something before they actually go to work. And then what we will do also, we will start working with contaminated scent articles. I may hand my scent article to somebody else that's standing there. I will have them roll it around in their hands. I will then ask the dog to check them. I will present the scent article to the dog, and she will then take the trail to the person who's not there. And we call that a missing member exercise.

HARRIS: Now, ultimately, with all of this training, why is it that the dogs do what they do? We're not talking from the mechanical or what, try it a different way. It's somewhat leading. Is there some reward for them as part of this training?

ANDERSON: Correct. When they get to their person, they get a food, they get food treats, or a toy, or both. So there's, there is a big reward, and when you have a puppy, it's a huge party. I mean that person that they just ran away from becomes the most important person in their life, even more important than the person that, that followed them there on the end of the line. We make that person that they're looking for the most important person in their life at that time, and then we graduate from there. As the dog learns what's expected, they know what's expected, they know when you come out and you put the harness on, they know when you take the line out. I have specific collars that I put on my dog. She knows when I take that leather collar that's on her neck there and put that on her, she knows she's going to work. That's before the harness goes on. And I'm getting distracted and I forgot your question.

JUDGE: Who rewards the dog? When you use the puppy, does the person she finds rewards the dog?

ANDERSON: The person that she finds is the reward person, correct.

JUDGE: You don't reward the dog?

ANDERSON: I try to stay neutral, because I don't want her to pay attention to me. I want her to pay attention to that person.

JUDGE: Okay. What happens if she doesn't find anybody? She doesn't get a reward, then, right?

ANDERSON: If she doesn't find anybody, like on a search? She doesn't get a reward. But by the time a dog gets to that level, they are in what we call a variable reward stage, where they may go out and work, and we train them so every time we set something up, we try to make sure that they get a reward. But they have gotten to the point where if they don't get their quote-unquote paycheck once or twice, they're still going to go out and work that third time, because there's still that hope that that paycheck is going to be there. And if we get a series of searches, which we have, we may go out and do a one-quarter mile trail where the trail goes around the corner and the person's right there, just to add that paycheck in before they have to do their seventh or eighth search with no reward.

HARRIS: Now, you were pointing up to the screen and talking about some collars and harnesses.

ANDERSON: Uh-huh.

HARRIS: So let's go to that because it kind of comes in right now at this point in time. Looking at the photograph that's up there, 209, there's the bigger photo of Trimble to the right in that, and you were describing a leather collar. Is that the one that's around the dog's neck? Or is that the one that's on the dog's chest?

ANDERSON: The collar, the leather collar is the one around her neck. It's right above the orange collar, actually.

HARRIS: What is the device that's kind of around the dog's chest?

ANDERSON: That's her harness. That goes on right after the leather collar, and that's when she's getting ready to go to work.

HARRIS: And what is the harness for?

ANDERSON: The harness is so that she can drive forward and I'm not checking her. She's not pulling against her trachea, she's not pulling against anything that's going to make working uncomfortable for her.

HARRIS: And at the top left of that photograph there is, you were describing the dog's position and behavior in that picture. There seems to be something attached to that harness. What is that?

ANDERSON: That's what I call her line. Trimble works on a 15 foot line. Because Trimble likes to verify and will verify the edges of her trail, if it's a very fresh trail, I work her on a little bit of a shorter line. Some people work their dogs on up to 30 feet of line.

HARRIS: When you're saying she likes to verify her trail, what is that?

ANDERSON: If she's working on a trail and she's in the center of the trail, that's where her scent is the strongest, strongest. On occasion she will veer out and you'll see her nose go down, and she'll make a circle. And it's like she's finding the edge of that scent, and then she'll come back and line back out on the strong scent again.

HARRIS: Now, you, going through this process, what you've been telling us, is this what Trimble has done through Trimble's life? This little puppy doing the puppy tracks that you were telling us?

ANDERSON: Correct.

HARRIS: And at some point in time was she ready to go into the search and rescue arena?

ANDERSON: Correct. Yes.

HARRIS: Now, I want to go back to, for Trimble to come on line to the Contra Costa County Sheriff's Department, did she need some type of test or exam or something?

ANDERSON: We did our, our very first certification we did with the California Rescue Dog Association, because at that point in time the Office of Emergency Services and Contra Costa County did not have specific testing standards in place for the trailing dogs. And so they accepted the CARDA certification. So I tested her under the CARDA guidelines for her first test.

HARRIS: Now, when you're talking about CARDA guidelines, we've heard what that is, but I want to go through their guidelines, what they did. Is this a process where you just show up and show them your dog and you get some type of certificate?

ANDERSON: No. What you have is to do you go through a process. You do some basic obedience. For trailing dogs, because they also recognize that a lot of your trailing dogs you don't want heavy obedience on them, so they do basic obedience. They have to walk like a sane creature on the end of a leash and not be dragging you everywhere, when they're on a collar. They have to be able to be tied up. They don't have to do a hard sit/stay where they're not tied, where they have to stay. They are just expected to stay tied to a fence, or something of that nature. They have to be, they have to demonstrate agility over some different surfaces. They are, I believe, exposed to cadaver scent only for the notification of the handler, so that if their dog were to find somebody, does the dog have aversion. Will the dog go I'm not going in there, or will the dog drive forward in there. And then for the trailing portion of it, they have to do a 48 hour old trail. They have to do a 72 hour old trail, can I, may I look at my,

JUDGE: Sure.

ANDERSON: sign offs? Just to make sure I get the hours right. Whoops. Wrong binder. They have to do two night search trails, which aren't any specific age. They have to do a 48 hour old trail, a 96 hour old trail. They have to do an urban trail where the trail is strictly in an urban setting. Streets and sidewalks. And then their test is on a trail that is, I believe, 18 to 24 hours old.

HARRIS: Just to go back through some of those things. You're saying 48 hour old trail and a 96 hour old trail?

ANDERSON: Correct.

HARRIS: What do you mean, it might be obvious, but just so we're clear, what do you mean by that?

ANDERSON: Means that the trail was laid 48 or 96 hours before the dog ran the trail.

HARRIS: Now, take us through when you're setting up, having been a trainer yourself and you're setting up one of these problems, or one of these trails, how do you actually go about doing that?

ANDERSON: You will map out where you want the trail to go, whether you want it to follow, whether you want it to be primarily a wilderness trail. Whether you want it, which would be more like in the park lands, on fire roads, cross country, on cow trails, or whether you want it to be urban trails. And, actually, I believe all the CARDA trails, except for the urban trail, are expected to be wilderness. But you will map out the trail. You may or may not walk with the person that is laying the trail. But you map the trail, and you try to set it up in such a way that the person that then is going to be at the end of the trail for the dog can walk out, can continue on past that point and then walk back in so that they're basically coming a back way into where they're going to wait for the dog, so that the dog isn't put in a position of getting pulled off and taking a fresher trail. That's not the goal of these exercises. The goal of these exercises is to watch the dog work trails at different ages.

HARRIS: I was going to ask you about that. So you don't make your subject sit there for 96 hours?

ANDERSON: No. We would have a lot of trouble getting subjects if we did that, I think.

HARRIS: So when you say,

GERAGOS: Kind of like volunteering for jury duty.

HARRIS: So you're saying that you set it up so there's kind of a back way for them to go out and then they come back in?

ANDERSON: Correct.

HARRIS: Why do you have them come back in?

ANDERSON: Because we want the dog at the end to find the subject.

HARRIS: Even on, if it's some test or sign-off for one of these organizations?

ANDERSON: Correct. Correct.

HARRIS: Now, you were talking about the different things that the dog had to do. Did Trimble go through this process, the sign-off, check-off?

ANDERSON: She did. She went through the entire sign-off process.

GERAGOS: There would be an objection. Vague as to time.

JUDGE: I think you can be more specific.

HARRIS: That was going to be my next question.

HARRIS: So when was it that Trimble was signed off on?

ANDERSON: It happened with, it happens within a time frame, and it's not a specific time frame, excuse me. When you start working a dog, you may, when you, and I think some of Trimble's obedience sign-offs, obedience agility, transport, where she had to run...

HARRIS: You can go on.

ANDERSON: Where she had to ride in a vehicle with other dogs, because aggression is not accepted in a search dog. If a dog can't ride in a vehicle with other dogs, they're not going to be a search dog. She had to do helicopter training. Many of those happened in 99, 2000. I believe she started her sign offs, she started her first sign offs, her 48 hour trail, in 2001. She finished the sign offs in 2002.

JUDGE: When was she actually certified by CARDA?

ANDERSON: She was certified by CARDA in February of 2002.

JUDGE: February 2002?

HARRIS: February.

GERAGOS: February 2002.

ANDERSON: I believe so. I can double-check.

JUDGE: Yes.

HARRIS: So Trimble becomes certified February of 2002 by CARDA?

ANDERSON: Correct.

HARRIS: And at that point in time did Contra Costa County accept that certification and allow you to start working with them?

ANDERSON: Yes, they did.

HARRIS: And did also the Office of Emergency Services accept that certification, allow you to start working with Trimble?

ANDERSON: Correct.

HARRIS: Now, you, you've told us about all the training, and the dog goes through this certification process; February 2002, certified dog. Do you get to stop training the dog at that point in time?

ANDERSON: No. We continue the, the training is an ongoing process with the dogs. Once, I spent three years working this dog before I ever tested her, because I wanted to try to make things as smooth as I could, to work out as many wrinkles that I might see and try to get her as solid as I could before I ever tested her, because I knew that trailing dogs are a very limited commodity in California, and I wanted as solid and competent a dog as I could produce, so that she could hit the streets right away.

HARRIS: When you say you started doing this training even before the sign-off process, I want to go through some of your records about this. When you work with the Contra Costa Sheriff's Department, do you try to maintain somewhat of a training log for your dogs?

ANDERSON: I do.

HARRIS: And do you have those training logs with you?

ANDERSON: I do.

HARRIS: I'd like you to look at, if you would, at October 8 of 1999. For counsel's information it's Bates stamp 25748.

ANDERSON: Okay.

HARRIS: Do you have that one there?

ANDERSON: I do. Was that, that was the seminar? Says Beloit. Beloit.

HARRIS: Correct. At the top there's a location?

ANDERSON: Uh-huh.

HARRIS: What type of training exercise was this?

ANDERSON: This was actually a very first introduction to working a vehicle scent. This was a seminar in Beloit, Kansas.

GERAGOS: 7, I'm sorry Bates number 74?

HARRIS: 25748.

GERAGOS: 8. Sorry.

ANDERSON: So she was given a very short trail to a vehicle. It was, because a vehicle trail is much more dilute than a regular person walking trail. And she actually hadn't, I don't recall, I don't think had done any bike trails at that point. So she had worked primarily on contact trails at that point. On this trail, I commented that she was a little slow to sort out the vehicle trail and figure out what was expected. And then once she actually figured it out and realized that she was working with a much more diluted scent source, then she did very well on it.

HARRIS: Now, there's a lot of things I want to cover in what you've just given in your answer. First off, this was in Kansas?

ANDERSON: This was in Kansas.

HARRIS: Did you live in Kansas at the time?

ANDERSON: No. This was a seminar that I traveled to with Trimble.

HARRIS: And, again, something that you weren't reimbursed by Contra Costa County?

ANDERSON: No.

HARRIS: You were saying something about hadn't done a test or had not done a trail with somebody on a bike. You were talking about contact trails. Let's go through that. What is a contact trail?

ANDERSON: A contact trail is where a person, the person that the dog is looking for actually walks on the ground. So you have contact scent on the ground from the person the dog is looking for.

HARRIS: And you said working trails with someone on a bike. Is that, again not to beat the obvious, but that would not be a contact trail?

ANDERSON: That would be a non-contact trail, correct.

HARRIS: And then you were talking about a vehicle trail. Is that something different? Or is that the same as the bike?

ANDERSON: I think it's similar in that it's a non-contact trail, but I think your vehicle trail is a little bit more difficult because the vehicle encloses some of the scent. And so whereas you have a bike trail where the scent is coming off of that person, and that person may not be walking on the ground but the scent is still coming off of them, there's nothing enclosing the scent. So the next step from the bike trail then is the vehicle trail where there is something actually enclosing the scent.

HARRIS: Okay. So this was back in October of 1999 that Trimble was being, started on the path of training, at least, in these very difficult trails?

ANDERSON: Correct.

HARRIS: Going to November 23, 1999. That's Bates stamp 25741.

GERAGOS: Thank you.

HARRIS: Has a location of Pleasant Hill. Do you have that one?

ANDERSON: Yes.

HARRIS: Now, this particular trail, again, was this another kind of exercise or training problem for the dog?

ANDERSON: This was another exercise, and this was an older trail. This is where we were really starting to stretch the parameters of what she could do.

HARRIS: When you say older trail, what do you mean?

ANDERSON: This trail was a hundred and twenty hours old.

HARRIS: A hundred and twenty?

ANDERSON: And I can't divide by 24 fast enough to tell you how many days that is.

HARRIS: That's okay. Was there also environmental factors involved, A. There were environmental factors with this. We had a very heavy rainfall between the time the trail was actually laid, and she actually ran the trail. Much of this trail was on asphalt. So I didn't know, I mean, when I went in to this trail, I went into it from a very open-minded point of view. I didn't actually know if she would be able to do this trail because I didn't know exactly what the rain would have done to the scent conditions on the asphalt. Part of it was grass and I knew that the scent would hang on to the grass, but I wasn't sure what it would do on the asphalt. And then she did have some confusion at a gas station. And I think it was the gasoline fumes that gave her some problems there. I knew where the trail went, and when I walked her forward away from the gas station she picked up the trail again.

HARRIS: And was she ultimately able to find that person slash reward at the end of the trail?

ANDERSON: Yes, she was.

HARRIS: Looking at November 5th, 2000.

ANDERSON: Yes.

HARRIS: That's Bates stamp,

ANDERSON: San Ramone?

HARRIS: Yes. Bates stamp 25694.

ANDERSON: Right.

HARRIS: Was this another, again, what we're talking about, these are training exercises, so you're pushing the dog to try and find out what these parameters are?

ANDERSON: Right. We're kind of pushing the envelope a little bit to see are we going to get to a point where she can't do it.

HARRIS: What was the age of this particular trail?

ANDERSON: This trail I believe was five days. And her subject, Q. I, I'm going to help you out there. There's a box there says trail age and hours.

ANDERSON: Uh-huh.

HARRIS: How many hours is that?

ANDERSON: A hundred and twenty hours.

HARRIS: And down there's a text, written out, A. I wrote, I wrote five days.

HARRIS: Okay. So doing the math back then, A. Five days.

HARRIS: Okay. Tell us about this particular exercise.

ANDERSON: This was what you would call a very heavily trafficked trail. She really had to sort through a lot of human scent. Her subject's son actually was playing football the night that she laid the trail, so she walked out with the football crowd after the game to where they had parked their vehicles. She then came back when I ran Trimble. And, actually, does it say here? It doesn't say here. My recollection is that the dog also worked off of shell casings to do this trail. Her, this woman's husband was a, at the time Alameda PD, and he, and she had gone out shooting with him and had collected shell casings. So we scented Trimble off of shell casings and then let her work the trail.

HARRIS: Now, just so we're clear, this was at some kind of either high school or football stadium?

ANDERSON: Correct.

HARRIS: And your subject that was laying this trail was with a crowd?

ANDERSON: Correct.

HARRIS: And then it was five days later that the dog ran this trail?

ANDERSON: Correct.

HARRIS: Okay. Moving to December 30th,

JUDGE: Was that exercise successful?

ANDERSON: It was successful. The person actually, because she didn't remember exactly where she had parked, intersected the trial with a fresh trail, and Trimble turned as soon as she hit the fresh trail.

JUDGE: She was successful?

ANDERSON: Yes.

HARRIS: December 30, 2001. Bates stamp number 25656.

ANDERSON: Walnut Creek to Dublin.

HARRIS: And how old was this trail?

ANDERSON: 96 hours.

HARRIS: And explain to us what this training exercise was.

ANDERSON: This was a trailing exercise where, if we have an exceptionally long trail to do, or if the dog is continuing to go, continuing to go, continuing to go, we may stop them and do what we call a leapfrog forward. It becomes then a drop trail, where it's difficult for a dog, if probably not impossible, for a dog to do 30 miles of trail, just from the physical stamina standpoint. So what we do is we will stop them, we'll put them in a vehicle, we'll drive them forward a certain distance, and then we'll restart them on the trail, determine if they pick up scent, and then continue on the trail.

HARRIS: And how was this trail laid down by your subject?

ANDERSON: This was a bike trail. The subject rode his bike from Walnut Creek to Dublin, and then took the BART train back to his house.

HARRIS: And was, was the dog successful?

ANDERSON: The dog was successful.

HARRIS: So, again, this is one of those non-contact trails?

ANDERSON: Correct. She didn't have contact trail until she actually got to the BART parking lot. The subject drove back to BART and then walked into the station and went upstairs, and waited for the dogs up there. So when we got to the BART parking lot, we scented the dogs on the fresh trail that left from the vehicle.

HARRIS: Looking at January 19th, 2002, Bates stamp number appears to be 25655. Do you have that one there?

ANDERSON: I do.

HARRIS: What type of trail was this?

ANDERSON: This was a vehicle trail.

HARRIS: When you say vehicle trail, are you talking about a car?

ANDERSON: This was a vehicle trail in that her subject was in a vehicle, her subject was actually driving a vehicle. This was probably the, the first really true hard-core vehicle trail that we did. So this was a vehicle trail where the subject was in their own vehicle. They drove up onto the freeway. What we wanted the dogs to do was to commit to the entrance up onto the freeway. We would then stop them, drive them to 50 yards from the next exit, take them out, restart them, and let them determine whether to take the next exit or not. And so what we did was we had them drive down three exits, go down, park. When they knew we had hit the last exit, then they got out and started walking down the sidewalk. So the dogs were expected to stay on the freeway past two exits, well, commit to the first exit, or entrance onto the freeway, stay on the freeway past two exits, go down the third exit, make a right, go down the sidewalk, and then they caught their person walking down the sidewalk.

HARRIS: That's what Trimble did?

ANDERSON: Yes.

JUDGE: And that was a successful test?

ANDERSON: That was successful.

HARRIS: Now, going to the, the next page, I have it also as January 19th of 2002, El Sobrante, and that would be Bates stamp 25654. Was this a bike trail?

ANDERSON: This was a bike trail.

HARRIS: And what was the age of this particular trail?

ANDERSON: It says a hundred and forty-four hours.

HARRIS: We won't make you do the math.

ANDERSON: Thank you.

HARRIS: Now, when you, when we were, just to go through this process again, a hundred and forty-four hours. So the subject goes out, lays a trail, and then you bring the dog in to the start location of that particular trail?

ANDERSON: That's correct.

HARRIS: And then scent them off an article and see if they can find the trail?

ANDERSON: That's correct. And this was another pushing the envelope trail. This trail, her subject had ridden, I don't recall if it was two weeks earlier, but he had a loop that he did. This trail actually cut off from that loop, and she needed to stick to the freshest trail, which was a hundred and forty-four hour old trail.

HARRIS: And how long was this trail?

ANDERSON: About two and a half miles.

HARRIS: And was the dog successful?

ANDERSON: The dog was successful. She had a little trouble on the very top portion where the sun had kind of dried things out. We had had some unseasonably hot weather, and she had to work at that a little bit. But once she got down off of that, she did very well.

HARRIS: Going to March 9th, 2002?

GERAGOS: Bates number?

HARRIS: Bates 25647.

GERAGOS: Thank you.

HARRIS: What was the age of this particular trail?

ANDERSON: This trail was 330 hours, which I think is two weeks.

HARRIS: And what type of trail was it?

ANDERSON: This was a bike trail. And then the subject walked in a different way and intersected the bike trail, and, and so she had to come off of the two week old bike trail and follow the fresh contact trail to the subject.

HARRIS: And did she?

ANDERSON: She did.

HARRIS: Going to April 7, 2002.

GERAGOS: Bates stamp?

HARRIS: Bates stamp number is 25643.

GERAGOS: Thank you.

HARRIS: What was the age of this trail?

ANDERSON: This was a hundred and eight hours.

HARRIS: What type of trail?

ANDERSON: This was a bike trail.

HARRIS: Again, a non-contact trail?

ANDERSON: Non-contact trail.

HARRIS: And approximately how long?

ANDERSON: About six miles.

HARRIS: Did she succeed on this particular test?

ANDERSON: She was successful on this one, and this was a really good trail for her in that we had two decoys with her, one of them being a person that she had found a lot and was very attached to. And they rode with us. They also ride bike patrol for the East Bay Regional Parks, so they would ride, and I would have them ride ahead to intersect hikers, just to let them know what we were doing, but also to prove Trim, to make sure that she focused on the scent that she was working on and not to be visually distracted by the people going past her.

HARRIS: Moving to May 18, 2002. Bates stamp number is 25639.

GERAGOS: Thank you.

HARRIS: What was the age of this trail?

ANDERSON: Twenty-four hours.

HARRIS: And what was the length?

ANDERSON: About four miles.

HARRIS: What type of trail?

ANDERSON: This was a bike trail intersected by a fresher bike trail.

HARRIS: How did Trimble do?

ANDERSON: She did very, very well on this one. She actually had three people at the end of the trail, and she tagged the correct one.

HARRIS: Moving forward to September 1st of 2002. Do you have that one?

ANDERSON: I do.

HARRIS: And Bates stamp 25629. What was the age of this trail?

ANDERSON: This was a 24 hour old trail.

HARRIS: And where was it set up at?

ANDERSON: This was actually set up inside the Sun Valley Mall, strip mall, shopping mall.

HARRIS: Inside the mall?

ANDERSON: Inside of the mall. It started at the Penney's exterior doors on one end, and ended upstairs in a hamburger place.

HARRIS: How did the dog do?

ANDERSON: She did very well. She was quite happy about all of the external stimuli on this trail, but she worked it. I was actually quite pleased with the way she worked it because she really worked through it. She committed well to the stairs. And when she got up to the place where the hamburger place was, the subject was sitting in a far corner, and she had to come in

the entrance and turn away from the food source to go to her subject. For a Labrador, that's not easy.

HARRIS: Did she succeed?

ANDERSON: She did.

<Afternoon recess>

HARRIS: Ms. Anderson, we were going through your training records with Trimble and we're going to move on at this point in time. What I want to talk about is moving to December 2002. Were you and Trimble as a team certified to work for CARDA, the Office of Emergency Services and Contra Costa so that you could be called out in a search and rescue operation?

ANDERSON: That's correct.

HARRIS: On December 26th did you, you made a slight face there so I'll give you a chance to catch up.

ANDERSON: That's fine. I'm fine now.

HARRIS: Directing your attention to December 26th of 2002 did you accompany Captain Boyer as a mutual aide call-out to go to the city of Modesto?

ANDERSON: I did.

HARRIS: And as part of that process did Captain Boyer meet with some detectives from the Modesto Police Department?

ANDERSON: He did.

HARRIS: Trying to lead you through a little bit without leading.

GERAGOS: Leading.

HARRIS: Were you somewhat, just try this one again. When you went there did you ultimately go to a house?

ANDERSON: We did, yes.

HARRIS: And you're saying "we," you, Captain Boyer, who else?

ANDERSON: Me, Captain Boyer and one other search and rescue member.

HARRIS: And do you know who that person's name is?

ANDERSON: Cindee Valentin.

HARRIS: When you were at that particular residence, do you recall the address of the residence?

ANDERSON: It was on Covena Avenue. I'm not positive of the street address. 623 or something like.

GERAGOS: I'll stipulate she went to 523.

DISTASO: We'll accept that stipulation.

JUDGE: Went to the Peterson residence.

HARRIS: Right.

JUDGE: All right.

HARRIS: During the time that you were there did you see some items that were collected for potential scent articles for use at a later point in time?

ANDERSON: Yes, I did.

HARRIS: And one of those particular items did you in fact use that at a later point in time as a scent, scent item?

ANDERSON: I used some glasses that were in a hard shell glass case.

HARRIS: Did you also go back to the house on December 27th?

ANDERSON: I did.

HARRIS: And did you happen to be in the backyard or in an area of the backward by where there was a storage shed?

ANDERSON: Yes.

HARRIS: And did you see a blue tarp?

ANDERSON: I did.

GERAGOS: They'll be an objection. This is 402.

JUDGE: Well, I don't know if this is beyond the

GERAGOS: This is all 402.

JUDGE: Do we have to have a hearing now?

GERAGOS: I'm bringing it to the Court's attention.

JUDGE: This is what I'm going to do. Skip the blue tarp until tomorrow and I'll rule on it. Why don't we go on to the other stuff. Just skip the blue tarp for the time being until I have a chance to rule on it. He wants a hearing on that, we have to have a hearing. That means you have to be here at 8:30, Mr. Geragos.

GERAGOS: That's fine, judge. I'll be here at 8:15, if you want.

JUDGE: No, 8:30 is all right. Not quarter to 9:00. We'll reserve a ruling on the blue tarp. Just go on to the other stuff.

HARRIS: I want to move forward in time again to December 28th of 2002. Did you, as part of this mutual aide process, the call-out, were you again requested to assist the Modesto Police Department on the 28th?

ANDERSON: Yes, I was.

HARRIS: And where did you go to?

ANDERSON: I went to the Berkeley Marina.

HARRIS: And did you go to a particular location or area of the Berkeley Marina?

ANDERSON: I don't know specific areas of the Berkeley Marina, but there was a boat lunch area and I responded to that area with my dog Trimble.

HARRIS: If I can have marked next in order.

JUDGE: Okay. That will be No. 210. This is the photograph of the marina that we were talking about this morning?

HARRIS: Yeah.

HARRIS:

HARRIS: Ms. Anderson, let me show you what's been marked as People's No. 210. Do you recognize that location?

ANDERSON: I do.

JUDGE: You can lead her as to where everything is located.

HARRIS: All right.

JUDGE: If you want to.

HARRIS: What I'm going to is try not to stand too close to you and put these up on the screen. The area that we're referring to that we're talking about the boat launch area, is that this area towards the center of the photograph, People's No. 210?

ANDERSON: That's correct.

HARRIS: And was there a separate parking lot area that's connected with that boat ramp area?

ANDERSON: Behind the line of trees that are just below the actual piers there is a large parking lot area. You can see a vehicle park in the middle of it.

HARRIS: And you're referring to this parking lot in here?

ANDERSON: Yes.

HARRIS: And to the upper right, this is the bay area over here?

ANDERSON: Correct.

HARRIS: And, then, of course, we see at the top of the photograph there are boats in the marina?

ANDERSON: Correct.

HARRIS: And when you, when you went to the marina on the 28th

JUDGE: Can I ask one question. Do you know where the bathrooms are located?

ANDERSON: Yes, I do.

JUDGE: Do you want to point them out. You can lead her to where the bathrooms are located.

HARRIS:

HARRIS: Now the bathroom area, would that be this building over here?

ANDERSON: That's correct.

JUDGE: All right. Go ahead.

HARRIS: On the 28th when you went to the Berkeley Marina, did you meet up with Captain Boyer from Contra Costa Sheriff's Department?

ANDERSON: I did.

HARRIS: And did he provide you with a particular item for you to use as a scent article?

ANDERSON: He did he provided me with the glasses inside the glass case.

HARRIS: And is this the same glass case and glasses that you were referring to you saw collected on the 26th?

ANDERSON: That's correct.

HARRIS: I show you what's been marked as People's 78. Have you look at the inside of that.

ANDERSON: Yes.

HARRIS: And you've now had a chance to look at that, is that the glasses case with the glasses in it that you used as a scent article?

ANDERSON: Yes, I believe it is.

HARRIS: When you were asked to use that particular scent article, were you looking to see if you could find a trail for Laci Peterson?

ANDERSON: I was looking to see if my dog could detect Laci's scent in the marina area there.

HARRIS: And did you attempt to, did you have Trimble get out and look to see if you could find Laci's scent in the marina?

ANDERSON: I did.

HARRIS: Tell us what you did.

ANDERSON: I took her, there's two entrances into the direct dock area there where the actual boat launches are.

HARRIS: You're looking up at the screen. So what I'm going to do is present you with a laser pointer.

ANDERSON: Okay. Wait. You have to show me how to use it.

JUDGE: Do you know how to use it?

ANDERSON: I hope so. I'm better with dogs than I am with electrical things. This is an island with trees, a dirt area. This area is some parking for trailers. This is the big parking lot area. There's an entrance coming in this way. There's an entrance coming in this way. We call those, when you work with a trailing dog, you call those choke points if you're looking for the presence of a person's scent that may have entered the area. So those two areas on each side here were what I considered choke points. So what I did was I took Trimble to this side and I harnessed her up and I gave her the scent article. Trimble went over to the vegetation, come on, over to the vegetation and circled back to me and stopped and gave me a no scent trail indication. When you have asphalt and urban

GERAGOS: Objection, non-responsive.

JUDGE: Overruled. She's answering the question. Go ahead, you can answer it. Go ahead, you can answer.

ANDERSON: When you have asphalt in this kind of situation and you have an area that can tend to be windy, you may find that you're going to have scent over on the vegetation versus right on the asphalt where you have a lot of traffic. So I walked Trimble forward and I asked her to check in this area where there was some vegetation. Could you see that? This area. Come on. This area right in here. I think I'm losing my laser. I asked her again to check for scent and she gave me a no scent indication, no trail indication. I took her over to this side, again, at a choke point, and I repeated the process. I created, or I approached it as a completely new trail as though this trail I had never done, I rescented her on the article and I asked her to locate scent. She was about in here, she moved that way, circled back around, took a straight line all the way out up to this pylon right there, stopped, checked out over the water, the wind was coming into her face so that would be a natural thing for her to do would be to check out over the water into the wind, turned around and gave me end of trail indication. I stood for a minute to see if she would move on or if she would stick to that end of trail, where am I. She turned, went along this side, went down about three feet down the corner of this, I'm losing my laser.

JUDGE: I tell you what, there's a pointer. Can you go to the board and just keep your voice up, Ms. Anderson, so the jury can hear you. We'll do it the old fashioned way, we'll use a pointer. Show us the direction now where the scent took the dog.

ANDERSON: I scented her here. She made a circle, lined out on her line, went down here, down here, down here, down to this pylon. That's where she gave me the first end of trail. I stood for a minute just to see if she would try to locate more trail, she turned, went this way, went down there, turned around, came right back and stopped and gave me another hard end of trail indication.

HARRIS: You can go ahead and resume your seat. I want to go back through this. The first thing that you're describing for us that you did at both of these choke points is that you scented the dog. I went to go through the mechanical process of doing this. What or how did you go about scenting this dog, scenting Trimble on Laci Peterson's scent?

ANDERSON: What I do with Trimble, because she's a hard-driving dog, I make her sit and this is about the most obedience I ever put on this dog, I make her sit and I face her in what I believe to be a neutral direction so she never gets into the habit of scenting and driving forward or scenting and turning and driving behind her so that she has to think immediately about where, what her scent is doing and where it is going if there is scent there. So I faced her on each of these, I faced her, well, actually, they were different. On the one on the left I faced her towards the trees that are just above what they indicated is the bathrooms on this side of the island. I make her sit, I open the scent article and present the article to her, and in this case, what I did was I peeled the, with rubber gloves, I peeled the plastic ziplocs off of the article, opened the glass case so that she could scent on the glasses inside, presented that to her and gave her scent command or her trailing command. When I did it on the other side I faced her more towards the island and did it exactly the same way so that I approached both choke points as two individuals trails. I didn't just take her over to the other side and say, okay, we'll check here and see if you find scent, there were two individual trails.

HARRIS: Now when you were describing for us with the laser pointer, so I'll ask you to grab the pointer again just so we're all clear about this.

ANDERSON: The laser?

HARRIS: Not the laser, the old fashioned wooden one and have you go back up to the screen. So you told us the mechanical process of doing that on the side near the bathroom, but since the laser pointer wasn't working very well, let's go through the process of you scented her, where you just described for us, what is it that Trimble does on that side by the bathroom?

ANDERSON: On this side by the bathroom, it's easier to see from a distance. This is your island. I scented her facing about this direction. I think this is a shadow of a tree in about this area. I wanted her behind the line of the island. She went forward, checked this vegetation, circled back, came back, came back to my side. Left hand side, eye contact. No scent. Because this is asphalt, this is traffic, this is vegetation, mostly dirt, but in December there is a little

GERAGOS: Objection, asked and answered.

JUDGE: Overruled. You can finish your answer.

ANDERSON: And I thought if there's scent there she'd have a better chance of picking it up here on vegetation. So I walked her forward, had her check along here, she went up, worked along the vegetation, came back, left-hand side, eye contact, no scent.

HARRIS: Then you were describing for us on the other side that you went through the same process as you were just showing us how you scented Trimble?

ANDERSON: Right. Faced her in about this direction. She went out here about to the end of her line, which is 15 feet. Circled back around this way, went over here, went right down the side of the pavement, down here, down here to this pylon right here. And that's where she gave me first end of trail, no more trail. And then it was when I waited there she went this way, this way. I started to go with her. She didn't even get to the end of her line, when she made the corner, she came right back and find me and to a pylon.

HARRIS: You can go ahead and resume your seat. Now there are a number of behaviors that you were describing for us or telling us about. What I want to do is go back through those and have you describe for us what those were. Now when you were working the side of the parking lot, that choke point, as you call it, over by the bathroom, you indicated that Trimble was giving you

a no trail kind of signal or behavior?

ANDERSON: That's correct.

HARRIS: What is that?

ANDERSON: It's a behavior that I have taught her when you don't have scent, I want you to come back to my left side and tell me that you don't have scent by coming back to my left side. She may stand, she may sit, but she'll come back to my left side. It was a specific behavior so that as, as she was working a potential long, long trail where behaviors may get diluted, where if she is actually working scent, she will continue to work. This was a behavior that I put specifically to I don't have any scent indication.

HARRIS: Now when you moved to the opposite side of the parking lot, worked that second choke point, you indicated that you treated this as a completely separate trail or separate search at that point in time. And you were describing that she lined out?

ANDERSON: Correct.

HARRIS: I want to go back through what that behavior was and what that indicated to you.

ANDERSON: She went to the end of her line, pulled steady on her line level head and maintained that posture all the way out to that pylon.

HARRIS: Now you were describing it before earlier in the photograph. Put that one back up there. The upper photograph in 209, is that what you're referring to there?

ANDERSON: That's correct.

HARRIS: And what does that behavior indicate to you?

ANDERSON: That's a behavior that indicates that she's working a valid scent trail.

HARRIS: And the third behavior that you're describing for us or telling us about was when she got tot that pylon, checked and came back to that pylon, end of trail, what was that?

ANDERSON: That's the same indication she gave me by the bathrooms. Again, it's the same, it's a trained behavior. I don't have any more scent or I don't have scent at all, but it's a no scent indication.

HARRIS: So in your experience with this particular dog, Trimble had picked up the scent at that far point away from the bathroom and was heading up the dock?

ANDERSON: Correct.

HARRIS: Now this particular scent article, Laci Peterson's glasses, let me just talk about this a little bit. If, say, for example, someone that was close to her had deposited skin rafts or something along that particular item that you were using and that person had gone to the parking lot and drove out of the parking lot, which, how would Trimble figure out?

ANDERSON: If she had scented on somebody that had drove, driven into the parking lot and then driven out of the parking lot, Trimble would have taken the exit trail out of the parking lot.

HARRIS: And is that that freshest trail behavior that the dog was trained for?

ANDERSON: That's correct.

HARRIS: Judge, that's pretty much

JUDGE: As far as you can go?

HARRIS: Yes, except for that other issue.