

REVIEW

DOCUMENTARY REVIEW: *OF DOGS AND MEN*

By
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I. INTRODUCTION

Americans loves dogs. It is estimated that over a third of households in the United States have a dog, and those households have, on average, more than one dog.¹ Many of us come into contact with dogs on a daily basis, and for a lot of us, meeting a dog was our first encounter with a non-human animal. With those things in mind, it should not surprise people to learn that law enforcement officers encounter a significant number of dogs in various everyday interactions. These en-

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¹ See *U.S. Pet Ownership Statistics: Companion Animals*, AM. VETERINARY MED. ASS’N, <https://www.avma.org/KB/Resources/Statistics/Pages/Market-research-statistics-US-pet-ownership.aspx> [<http://perma.cc/6FYR-7Q3N>] (accessed Jan. 12, 2016) (listing number of households that own a dog in the U.S. as 36.5% and the average number of dogs owned per household as 1.6); see also *Pet Statistics: Facts About Pet Ownership in the U.S.*, AM. SOC’Y FOR THE PREVENTION OF CRUELTY TO ANIMALS, <https://www.aspc.org/animal-homelessness/shelter-intake-and-surrender/pet-statistics> [<http://perma.cc/5ZHZ-HBT7>] (accessed Jan. 12, 2016) (“Approximately 37[%]–47% of all households in the United States have a dog[.]”).

counters can happen in the course of mundane activities like patrolling the streets, or in the course of conducting more stressful tasks like serving warrants and making arrests. Most interactions between law enforcement officers and dogs are rather unremarkable; however, in recent years there has been increased public attention on some extremely shocking interactions between law enforcement officers and dogs.

Of Dogs and Men is a 2015 documentary that follows a number of real-life dog shootings across the U.S. The documentary is directed by Michael Ozias and produced by Patrick Reasonover. The film features executive producers Chris Green, Jason Kodat, and Crystal Hubbard and premiered at the prestigious Austin Film Festival. The filmmakers received a Documentary Feature Honorable Mention at the debut.

Of Dogs and Men focuses on a selection of dog shootings committed by law enforcement officers across the U.S. The film's compelling stories include:

- Cisco, who was playing Frisbee with his owner in the backyard in Austin, Texas, when law enforcement officers arrived (at the wrong address) pursuant to a domestic dispute call, and then shot and killed him;
- Payton and Chase, who were shot by law enforcement officers during an improper raid on the home of the mayor of Berwyn Heights, Maryland;
- General Patton, who was shot and killed by a law enforcement officer after exiting the car with his tail wagging while his owner, completely innocent of any charges, was handcuffed on the side of a Tennessee highway; and
- Patches, a 12-pound Jack Russell terrier, who was shot and killed by a 250-pound officer who claims to have feared for his life.²

In addition to telling the stories of these unfortunate pets and pet owners, the film highlights recent legislation enacted in Colorado that attempts to address the problem.³ This film is careful to acknowledge

² Press Release, Austin Film Festival, Ozymandias Media to Premiere *Of Dogs and Men* at Austin Film Festival (Oct. 15, 2015) (available at http://ofdogsandmen.net/downloads/OM_ODAM_AFF_Press_Release_FINAL_101515.pdf [<http://perma.cc/T7ZX-ULTK>] (accessed Jan. 11, 2016)).

³ Colorado Revised Statute § 29-5-112 requires local law enforcement officers to undergo training in order to prevent the shooting of dogs by local law enforcement officers in the line of duty. COLO. REV. STAT. § 29-5-112. Specifically, this statute aims to assist in training officers to differentiate between threatening and non-threatening dog behaviors, as well as to employ non-lethal means whenever possible. *Id.*

that there are tens of thousands more stories like these across the country,⁴ with varying degrees of egregiousness.⁵

II. INITIAL IMPRESSIONS

People from all walks of life are now finding themselves victims of an issue that they likely had no idea existed. While the film may be distressing at times, it does a good job of focusing on how victims of this issue are fighting to find a solution to this shocking problem. This focus offers a ray of hope, as well as a call to action, for viewers during an otherwise upsetting documentary.

The filmmakers maintain balance in many difficult contexts throughout the film. The film's narrative succeeds at outlining the magnitude and prevalence of the problem while offering viewers hope that the problem is surmountable. The documentary refrained from vilifying individual law enforcement officers without diminishing the seriousness of the issue or the opinions of the victims. Achieving this level of objectivity is impressive considering the emotional subject of the film. While the interviews of affected dog owners form the backbone of the film, the perspectives of law enforcement officers, lawyers, policy makers, and dog-behavior experts make the film informative as well as fair. *Of Dogs and Men* strikes the delicate balance of being educational, factual, and unbiased while sensitively telling the stories of individual victims' very painful experiences.

Anyone who watches this film should do so expecting to be upset and angered by the sad and shocking phenomenon of dogs being shot by law enforcement officers in the U.S. While parts of the documentary will undoubtedly have this effect, ultimately, it leaves the viewer with a sense of optimism and empowerment about the positive changes they can make to address these types of shootings.

The filmmakers' framing of the problem as one that is surmountable makes this film appropriate for even more sensitive, dog-loving viewers. The casual, intimate style of the interviews with dog owners, law enforcement officers, behaviorists, and politicians makes the stories they tell seem sincere. These interviews reinforce the overall nar-

⁴ Laurel Matthews, a supervisory specialist at the Department of Justice's Community Orientated Policy Service (DOJ COPS) told *Police Magazine* in October 2015 that an estimated 25–30 dogs are killed by law enforcement officers per day. Amrita Khalid, *How to Keep Your Dog from Being Shot by the Police*, DAILY DOT, <http://www.dailydot.com/politics/dog-police-shot-safe-how-to-guide/> [<http://perma.cc/CZ4E-WPG5>] (Nov. 19, 2015) (accessed Jan. 17, 2016). Josh Weider, director of technology at the Puppycide Database Project believes that this estimate is too low. *Id.*

⁵ See, e.g., Spencer Remoquillo, *Dog Killed After Attacking Officer*, LANCASTER EAGLE GAZETTE, <http://www.lancastereagle.com/story/news/local/2015/11/20/dog-killed-after-officer-attack/76096500/> [<http://perma.cc/V7KE-E7AS>] (Nov. 20, 2015) (accessed Jan. 17, 2016) (reporting on a dog shooting where the law enforcement officer was responding to a call about a dog bite and was attacked multiple times before shooting and killing the dog in question).

rative of the documentary, which is that we all want to tackle this issue.

In spite of the optimistic narrative of the documentary, it must be mentioned that the filmmakers do not sugarcoat the problem. This honesty makes the documentary a useful resource and tool for animal advocates and animal lawyers to get an overall picture of the problem.

III. LEGAL ISSUES RAISED

Of Dogs and Men touches upon a myriad of complex problems that underpin the phenomenon of dog shootings by law enforcement officers. While the documentary suggests that the lack of officer training specific to dealing with dogs is the key problem, it also acknowledges that prejudices against certain breeds, as well as the difficulty of pursuing and attaining an adequate legal remedy for the loss of a pet, also contribute to the complexity of the issue.

A. Inadequacy of Police Training

The lack of training for law enforcement officers specific to dog encounters is cited by many interviewees in *Of Dogs and Men* as being the fundamental problem in the shootings it describes. Despite the prevalence of such incidents, only three states (Colorado, Illinois, and Tennessee) have enacted legislation directly addressing the need for law enforcement officers to partake in animal behavior training, as well as officer training for the use of non-lethal force during interactions with dogs. While the fact that only three states have such legislation in place is quite alarming, the film portrays this as a good start to addressing the prevalence of this issue across the U.S.⁶

Part of the film focuses on the enactment of the Colorado bill,⁷ and celebrates its passage as an important legal step—both practically and symbolically. The Colorado statute requires local law enforcement to undergo training in order to prevent the unnecessary shooting of dogs in the line of duty.⁸ Specifically, this statute aims to assist officers in differentiating between threatening and non-threatening dog behavior, as well as to employ non-lethal means whenever possible.⁹

⁶ Another example of potential legal development in this area (though not discussed in the film) is “Dojie’s Law,” a ballot initiative proposed by Oregon citizens. Dana Tims, *Dojie, Hillsboro Dog that Lost Eye When Struck by Animal Control Officer, Dies of Cancer*, THE OREGONIAN, http://www.oregonlive.com/hillsboro/index.ssf/2015/01/dojie_hillsboro_dog_that_lost.html [<http://perma.cc/6LHU-X24D>] (Jan. 20, 2015) (accessed Jan. 14, 2016). Dojie’s Law would require the state-wide adoption of a standardized code of conduct and training procedures for animal control officers. *Id.* The proposal came about after an animal control officer struck Marlin Starr’s dog, Dojie, multiple times with a baton causing skull and shoulder injuries, including the eventual removal of Dojie’s eye. *Id.*

⁷ S.B. 13-266, 69th Leg., 1st Reg. Sess. (Co. 2013).

⁸ *Id.*

⁹ *Id.*

To put the question of training into perspective, it is interesting to note that law enforcement officers are not the only government employees who deal with dogs and dog bites on a regular basis. For example, postal workers regularly encounter all sorts of dogs and are sometimes bitten.¹⁰ U.S. Postal Service employees are often offered training by the agency on how to avoid dog bites.¹¹ The agency even keeps a database on dog bites, a marked contrast to the lack of data on law enforcement dog shootings.¹² It is also noteworthy that similar training for meter readers has, in certain areas, led to a significant decline in dog-bite incidents.¹³

This documentary also touches on how some commentators believe that the problem is an unfortunate consequence of the increasing militarization of the police force in the U.S. in recent years.¹⁴ Given the complexity of the police militarization issue, as well as the specific subject matter and length of the film, the filmmakers do not spend much time entertaining this complicated and controversial aspect of the issue.

In many of these encounters, dog behavior experts believe that officers simply do not know how to read a dog's body language.¹⁵ Dog behavior counselor, Brian Kilcommons, who helped produce the Justice Department's training videos on police encounters with dogs,¹⁶ says officers' inclination to "take command and take control" can cause them to antagonize dogs unnecessarily.¹⁷ According to Kilcommons, what law enforcement officers often term as aggression is usually

¹⁰ According to an annual U.S. Postal Service dog attack report, postal workers were bitten by dogs 5,767 times in 2014. *Postal Service Releases Top Dog Attack Rankings by City*, USPS, http://about.usps.com/news/national-releases/2015/pr15_026.htm [<http://perma.cc/8KLM-WDP3>] (May 14, 2015) (accessed Jan. 17, 2016).

¹¹ Dana Bartholomew, *How U.S. Postal Carriers Learn to Avoid Dog Bites*, L.A. DAILY NEWS, <http://www.dailynews.com/lifestyle/20140626/how-us-postal-carriers-learn-to-avoid-dog-bites> [<http://perma.cc/3DNG-EJYY>] (June 26, 2014) (accessed Jan. 14, 2016).

¹² USPS, *supra* note 10.

¹³ See *Dog Bite Prevention Training Helps Meter Readers*, DOG CHANNEL, <http://www.dogchannel.com/dog-news/dog-bite-prevention.aspx> [<http://perma.cc/U25B-4WXN>] (Apr. 21, 2007) (accessed Jan. 6, 2016) (citing a "90 percent decrease in the number of dog bites as a result of improved safety policies and the type of training meter readers received from experts in dog bite prevention[]").

¹⁴ For an example of the intersection of the issues discussed in *Of Dogs and Men* and the modern militarization of local police, see Nicholas Phillips, *St. Louis County SWAT Team Killed Family Dog over Code Violation, Suit Says*, RIVER FRONT TIMES, <http://www.riverfronttimes.com/newsblog/2015/06/04/st-louis-county-swat-team-killed-family-dog-over-code-violation-suit-says> [<http://perma.cc/A3SS-DDAM>] (June 4, 2015) (accessed Jan. 14, 2016).

¹⁵ Nathan J. Robinson, *Police Can Shoot Your Dog for No Reason*, WASH. POST, <https://www.washingtonpost.com/posteverything/wp/2015/11/13/police-can-shoot-your-dog-for-no-reason-it-doesnt-have-to-be-that-way/> [<http://perma.cc/A3SS-DDAM>] (Nov. 13, 2015) (accessed Jan. 14, 2016).

¹⁶ *Id.*

¹⁷ *Id.*

fear.¹⁸ Kilcommons adds: “If they have enough money to militarize the police with Humvees, they have enough money to train them not to kill family members. And pets are considered family.”¹⁹

This description by Kilcommons of pets as family members provides an interesting segue into another pertinent legal issue: the difficulties of pursuing legal remedies for the loss of a pet due to police action.

B. *Insufficient Legal Remedies*

Many dog shootings by law enforcement officers are not followed by any legal action. There are multiple interrelated barriers to accessing justice in these scenarios. One important barrier is what is known as the “blue wall of silence.”²⁰ This is a term used to denote an unwritten rule that exists among law enforcement officers not to report on a colleague’s errors.²¹ Secondly, the property status of animals makes recovering damages beyond their market value difficult.²² Even when monetary damages are recovered, they are often very small.²³ Another related barrier is one of a more practical nature: the reluctance to sue police departments for financial reasons or due to sheer intimidation.²⁴

In spite of these obstacles, a body of case law exists in this area. These include both common law tort actions and cases brought under the U.S. Constitution. In the event of a tort action, plaintiffs often have to follow specialized procedures, mandated by statute, for suing the relevant government officials.²⁵ Plaintiffs may also allege a violation of their Fourth Amendment federal constitutional right “against unreasonable searches and seizures”²⁶ which are brought under 42 U.S.C. § 1983.

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ This issue is discussed by Kevin Schneider of the Nonhuman Rights Project in an interview with Mariann Sullivan and Jasmin Singer on the podcast, *Our Hen House. Episode 308: Donny Moss on NYBC’s Liberian Chimps, Review of Of Dogs & Men by Kevin Schneider*, OUR HEN HOUSE, <http://www.ourhenhouse.org/2015/12/episode-308-donny-moss-on-nybcs-liberian-chimps-review-of-of-dogs-men-by-kevin-schneider/> [<http://perma.cc/ZZL4-VCZQ>] (Dec. 5, 2015) (accessed Jan. 14, 2016).

²¹ *Id.*

²² For a detailed discussion on compensation for loss of a companion animal, see generally Paterick, et al., *A Stepping Stone Toward Companion Animal Protection Through Compensation*, 22 ANIMAL L. (Spring 2016).

²³ Peter Barton & Frances Hill, *How Much Will You Receive in Damages from the Negligent or Intentional Killing of Your Pet Dog or Cat?*, 34 N.Y.L. SCH. L. REV. 411 (1989); Thomas G. Kelch, *Toward a Non-Property Status for Animals*, 6 N.Y.U. ENVTL. L.J. 531 (1998); Derek W. St. Pierre, *The Transition from Property to People: The Road to Recognition of Rights for Non-Human Animals*, 9 HASTINGS WOMEN’S L.J. 255 (1998); Gary L. Francione, *Animals as Property*, 2 ANIMAL L. I. (1996).

²⁴ OUR HEN HOUSE, *supra* note 20.

²⁵ See, e.g., Federal Tort Claims Act of 1943, 28 U.S.C. § 2674 (2012) (waiving the federal government’s sovereign immunity in certain circumstances and setting out the administrative procedures for such claims).

²⁶ U.S. CONST. amend. IV.

In the context of constitutional cases, it is interesting to note that every circuit to hear the issue has held that the killing of a companion animal constitutes a “seizure.”²⁷ In such circumstances, a law enforcement officer’s actions may only be deemed constitutional if, after examining the “totality of the circumstances,”²⁸ the destruction of the dog was “reasonably necessary to effectuate the performance of the law enforcement officer’s duties.”²⁹

Regarding tort cases, the property status of dogs makes recovering monetary damages above their market value difficult.³⁰ It also means that, with rare exceptions, negligent harm to a companion animal will not support an emotional distress claim in tort law.³¹ In contrast, nearly every state has carved out a narrow set of circumstances under which a negligent infliction of emotional distress claim can be asserted for harm done to another human, such as a child.³²

Dogs occupy a unique position in the hearts and minds of the American public, and many owners consider their dog an integral part of the family.³³ Courts have struggled to reconcile modern societal views on the value of pets with their legal status as mere property.³⁴ Cases such as *Hells Angels Motorcycle Club* suggest that a significant sum of money could be recovered for the killing of an individual’s dog,³⁵ however, this remains an unclear area of animal law. The amount of monetary damages recoverable in a lawsuit, assuming the plaintiff wins, varies from state to state and because “in some cases, each county has its own rules and procedures, it is important to be mindful of local practices that may affect the ability to successfully recover damages for the death or injury of an animal companion.”³⁶

²⁷ See *Viilo v. Eyre*, 547 F.3d 707, 710 (7th Cir. 2008) (“Every circuit that has considered the issue has held that the killing of a companion dog constitutes a ‘seizure’ within the meaning of the Fourth Amendment.”)

²⁸ *San Jose Chapter of the Hells Angels Motorcycle Club v. City of San Jose*, 402 F.3d 962, 975 (9th Cir. 2005).

²⁹ *Id.*

³⁰ *Paterick, et al.*, *supra* note 22.

³¹ See, e.g., *McDougall v. Lamm*, 48 A.3d 312 (N.J. 2012) (declining to extend the doctrine of negligent infliction of emotional distress to encompass companion animals).

³² SONIA S. WAISMAN ET AL., *ANIMAL LAW: CASES & MATERIALS* 166 (5th ed. 2014).

³³ Recently, a 2015 poll found that 95% of pet owners consider their pets to be members of the family. *More Than Ever, Pets Are Members of the Family*, THE HARRIS POLL, <http://www.theharrispoll.com/health-and-life/Pets-are-Members-of-the-Family.html> [<http://perma.cc/ZUW8-2UZQ>] (July 16, 2015) (accessed Jan. 19, 2016).

³⁴ See, e.g., *McDougall*, *supra* note 31, at 314 (“Although we recognize that many people form close bonds with their pets, we conclude that those bonds do not rise to the level of a close familial relationship or intimate, marital-like bond.”); see also *Rabideau v. City of Racine*, 627 N.W.2d 795, 798 (Wis. 2001) (“[The court is] uncomfortable with the law’s cold characterization of a dog, such as Dakota, as mere ‘property.’”).

³⁵ *Hells Angels Motor Cycle Club*, 402 F.3d at 975.

³⁶ *Damages for Death or Injury of an Animal*, ANIMAL LEGAL DEF. FUND, <http://aldf.org/resources/when-your-companion-animal-has-been-harmed/damages-for-death-or-injury-of-an-animal/> [<http://perma.cc/5QZ8-D6FP>] (accessed Jan. 14, 2016).

The personal stories featured in *Of Dogs and Men* highlight how dogs have come to occupy a very special place in homes and hearts across the U.S. The severe distress that many of the owners interviewed in this film display suggests that the law's classification of dogs as property is somewhat at odds with modern societal views. The solutions offered in the film for preventing dog shootings by law enforcement officers center around legislation that requires police training on dealing with dog encounters. Based on the similar training provided to other government agents,³⁷ such a requirement will likely go a long way toward significantly reducing the occurrence of such shootings. This solution will obviously not address the issues surrounding compensation for the loss of a pet in the case of a fatal shooting. Such a complex issue of legal philosophy is simply beyond the scope of the documentary.

C. Breed Discrimination and Breed-Specific Legislation

An examination of some of the key decisions on dog shootings reveals recurring themes. As explored in the previous section, it is clear that the property status of dogs complicates the ability to seek justice for the owners of dogs that have been shot. Another reoccurring theme in this body of case law is the issue of breed discrimination and the fear of certain dog breeds.

The prevalence of breed-specific legislation,³⁸ a blanket term for laws that regulate or ban specific breeds, demonstrates how deeply engrained discrimination against certain breeds is in the public mind.³⁹ In spite of the emergence of a wealth of studies showing that breed plays little, if any, role in predicting aggressive behavior in dogs, fears and prejudices surrounding certain breeds remain widespread.⁴⁰

Deeply rooted prejudices about the potential dangers associated with certain breeds likely play a role in the issue of these shootings in

³⁷ See, e.g., Bartholomew, *supra* note 11 (discussing the U.S. Postal Service's approach to training employees for dealing with dog encounters).

³⁸ For a detailed discussion of the prevalence of breed-specific legislation and associated problems, see generally Ann L. Schiavone, *Barking Up The Wrong Tree: Regulating Fear, Not Risk*, 22 ANIMAL L. (Spring 2016).

³⁹ *Information About Breed-Specific Legislation*, AM. SOC'Y FOR THE PREVENTION OF CRUELTY TO ANIMALS, <https://www.aspca.org/animal-cruelty/dog-fighting/breed-specific-legislation> [<http://perma.cc/KJK6-VJA3>] (accessed Jan. 11, 2016).

⁴⁰ See Gary J. Patronek, et al., *Co-occurrence of Potentially Preventable Factors in 256 Dog Bite-Related Fatalities in the United States (2000–2009)*, 243 J. AM. VETERINARY MED. ASS'N 1726, 1728 (2013) (criticizing “undue emphasis on breed” and finding factors such as isolation and abuse by owners to be among the most determinative); see also Safia Gray Hussain, Note, *Attacking the Dog-Bite Epidemic: Why Breed-Specific Legislation Won't Solve the Dangerous-Dog Dilemma*, 74 FORDHAM L. REV. 2847, 2850 (2006) (“There are three recurring commonalities in dog attacks. First, most dog bites occur in the home or another familiar place, with the vast majority of biting dogs belonging to the victim's family or friend. Second, most attacks are perpetrated by unaltered males. Finally, dogs contained or otherwise restrained on the owner's property are responsible for more serious and fatal attacks than those roaming at large.”).

more ways than one. First, prejudices about the danger of certain dog breeds likely feed into officers' anxieties about dealing with dogs in general. Second, prejudices against certain breeds can factor into the judiciary's determinations regarding the reasonableness of shootings.⁴¹

Discriminatory beliefs about the dangers of certain dog breeds remain entrenched in a large portion of the American public. Mandatory police training on dealing with dogs could go a long way to address this aspect of the problem, too. Incorporating education to help law enforcement officers understand that some of their fears regarding certain breeds may be unfounded may be a useful component in such training regimens going forward.

IV. CONCLUSION

Dog shootings often result in heartbroken families, bad publicity for police departments, and serious liability concerns for officers, police departments, and municipalities. The film ends by highlighting the fact that all involved parties (including owners, law enforcement and, of course, the dogs themselves) stand to benefit from addressing this issue through legislation.

While it would not likely surprise the average American to know that lethal force is often used against dogs during the course of difficult arrests, drug raids, and violent incidents, the volume of dogs that are shot by police far exceeds what the public would likely perceive to be normal or necessary. The circumstances under which many of these pets are killed would likely shock the public even more. This film exposes a shocking statistic from the U.S. Department of Justice, which estimates that over 10,000 pet dogs are shot by law enforcement officers in the U.S. every year.⁴² While this hard evidence is certainly compelling, anecdotal evidence from unfortunate victims has been an important catalyst for bringing this issue into the public eye. *Of Dogs and Men* does a wonderful job of mixing anecdotal evidence with cold, hard facts about the problem. General viewers can likely see themselves in the position of many of the unfortunate victims in this film and this empathy can often be more powerful than any Department of Justice statistic.

The modern ubiquity of social media, smartphone cameras, and police body-cameras has likely played a significant role in increasing public attention on these types of shootings. It is beyond doubt that this documentary will play a significant role in further heightening public awareness about these shootings and inspiring public action.

While the film offers a somewhat positive outlook on this problem, this issue is by no means a thing of the past. Even since filming, doz-

⁴¹ See, e.g., *Altman v. City of High Point*, 330 F.3d 194, 206 (4th Cir. 2003) (reversing the trial court's denial of summary judgment, the court held that the officer's conduct was reasonable when factoring in the breed of the dog in question).

⁴² Khalid, *supra* note 4.

ens of similar shootings in the U.S. have captured media attention. One particularly tragic story has been making news headlines across the world throughout late 2015.⁴³ This story concerned Autumn Steele, a 34-year-old mother of three who was fatally injured in front of her home in Burlington, Iowa.⁴⁴ Autumn was struck by bullets fired by a police officer who claims to have been aiming at her lunging dog.⁴⁵ This tragic incident was witnessed by Ms. Steele's three-year-old child and, unsurprisingly, has garnered a lot of media attention.⁴⁶

The makers of *Of Dogs and Men* do a commendable job of creating a film that entertains, educates, and inspires the viewer to take action on this issue in a way few other media can. The quality of the film, both in terms of content and production value, makes this an excellent documentary, both as a tool for activism and as an extremely enjoyable and entertaining way to spend just over an hour.

⁴³ *Cop Shoots Dead Mum-of-Three After Slipping on Ice While Aiming at Family's Dog*, NEWS.COM.AU, <http://www.news.com.au/world/north-america/cop-shoots-dead-mum-of-three-after-slipping-on-ice-while-aiming-at-family-dog/news-story/be3f3fbef69d45f6efb733324173e50f> [<http://perma.cc/RJY8-HCUK>] (Dec. 23, 2015) (accessed Jan. 19, 2016).

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.*