

# Animal Law

The newsletter of the Illinois State Bar Association's Section on Animal Law

## Chairman's column

BY DAVID H. HOPKINS

**There are multiple benefits in becoming a member of the ISBA Animal Law Section.** Most importantly, such membership opens the door to communication on developments and issues in our diverse field, including statutory reforms.

On the latter point, the ISBA has an outstanding Legislative Affairs Department. Our Section Council is provided, for its review, all proposed bills in Springfield in our areas. Usually, the Council determines whether to support or

*Continued on next page*

Chairman's column

1

**Chicago ordinance limiting the sale of cruelly raised animals upheld by the Seventh Circuit**

1

**"Property plus" – A new best interest standard for the family pet in marriage dissolution proceedings**

5

## Chicago ordinance limiting the sale of cruelly raised animals upheld by the Seventh Circuit

**Win Continues String of Legal Victories Nationwide over Challenges to Local Restrictions on the Sale of Certain Animals**

BY BRUCE WAGMAN AND MOLLY L. WILTSHIRE, SCHIFF HARDIN LLP

**In recent years, scores of state and local governments across the U.S. have enacted legislation** to halt sales in their jurisdictions of puppies and kittens that come from "puppy mills."<sup>1</sup> The term "puppy mill" is defined as a business involved in high volume breeding operations that provide little or extremely poor basic care for their animals (which may include puppies,

kittens, or rabbits within the term),<sup>2</sup> sell animals with a myriad of health and behavioral issues to an unsuspecting public, and place expensive burdens on local consumers and taxpayer-funded animal shelters. Puppy mill breeders profit while animals and their owners suffer.

Before it enacted the ordinance at issue

*Continued on page 3*

If you're getting this newsletter by postal mail and would prefer electronic delivery, just send an e-mail to Ann Boucher at [aboucher@isba.org](mailto:aboucher@isba.org)



## Chairman's column

CONTINUED FROM PAGE 1

oppose each bill; but, when appropriate, the Council suggests changes. In addition, from time to time, our Council seeks sponsorship of its own proposed bill. Over the years, numerous animal law enactments in Illinois have borne the "handprints" of our Section.

As to overall communications about key issues, our Section sponsors one or more all-day CLE Conferences every year. In early 2018, there will be two such Conferences. The first one will be on February 9, 2018, in Carbondale, Illinois; and the second Conference will be on March 2, 2018, in Chicago. Presenters at these Conferences will address numerous areas, including the following:

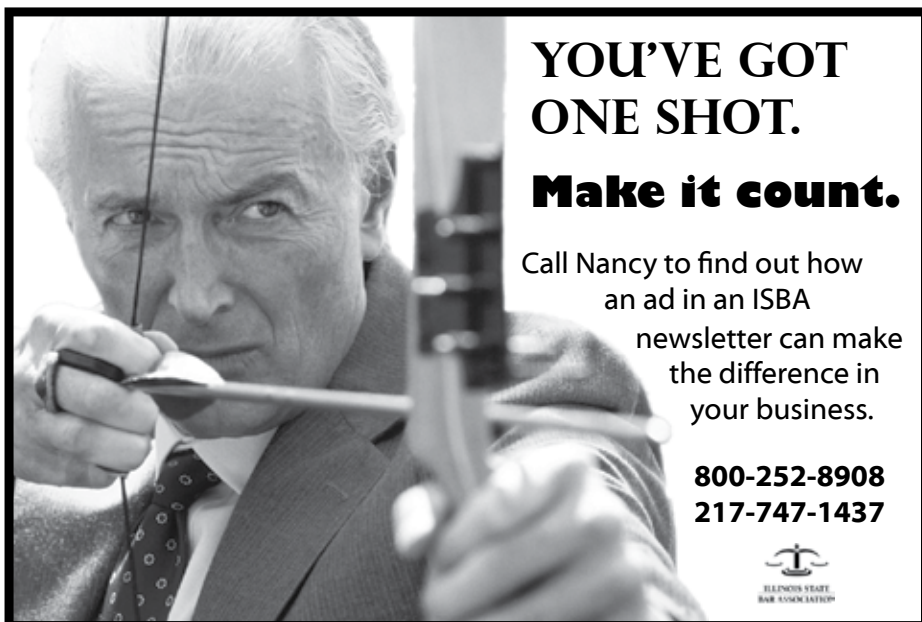
- Lessons learned from Harvey and Irma, for purposes of disaster planning;
- "Trap, neuter, vaccinate, and return" practices for feral cats;
- Regulatory developments for assistance animals;
- Results of placements ten years ago of some 47 pit bulls that had been associated with Michael Vick;
- The new era for divorce court allocations of marital pets;
- Recent developments in animal regulations, such as emerging ones involving chickens and/or llamas in

urban settings;

- Current issues in terms of protections for farm animals, and developments in the wake of the recent Chicago Tribune investigation into livestock cruelty in Illinois;
- Protections for carriage horses;
- New issues arising from animal forfeitures in neglect cases;
- Developments in sister states regarding legal advocates testifying in cruelty and neglect cases;
- Perspectives on canine breed specific discrimination;
- Emerging rules on transparency for animal shelters; and
- Ethical issues in animal law areas.

Animal law topics are truly diverse! Flyers on the two Conferences will soon be circulated. Such flyers will provide much more details on the speakers and their presentations. Be on the look-out for them!

More can be learned about our Section's work at our Council's meeting on December 8th, at 8:30 a.m. at the Palmer House Hotel in Chicago, in connection with ISBA's Mid-Year Meeting. All Section Members are encouraged to attend; and all other ISBA Members, who are interested in animal law, are cordially invited. ■




**YOU'VE GOT ONE SHOT.**

**Make it count.**

Call Nancy to find out how an ad in an ISBA newsletter can make the difference in your business.

**800-252-8908**  
**217-747-1437**



## Animal Law

Published at least four times per year. Annual subscription rates for ISBA members: \$25.

To subscribe, visit [www.isba.org](http://www.isba.org) or call 217-525-1760.

### OFFICE

ILLINOIS BAR CENTER  
424 S. SECOND STREET  
SPRINGFIELD, IL 62701  
PHONES: 217-525-1760 OR 800-252-8908  
WWW.ISBA.ORG

### EDITORS

Melissa Anne Maye

### MANAGING EDITOR / PRODUCTION

Katie Underwood

✉ [kunderwood@isba.org](mailto:kunderwood@isba.org)

### ANIMAL LAW SECTION COUNCIL

David H. Hopkins, Chair  
Lisa Velez, Vice-Chair  
Richard M. Seligman, Secretary  
Elise A. VanKavage, Ex-Officio  
Timothy A. Gutknecht  
Stephen F. Hedinger  
Hon. William E. Holdridge  
Scott W. Kummer  
Melissa A. Maye  
Jane E. McBride  
Anna E. Morrison-Ricordati  
Angela E. Peters  
Molly Lauren Wiltshire  
Jennifer A. Shaw  
Angelica W. Wawrzynek, Board Liaison  
Blake Howard, Staff Liaison  
Lisa M. Nyuli, CLE Committee Liaison  
Jane E. McBride, CLE Coordinator

DISCLAIMER: This newsletter is for subscribers' personal use only; redistribution is prohibited. Copyright Illinois State Bar Association. Statements or expressions of opinion appearing herein are those of the authors and not necessarily those of the Association or Editors, and likewise the publication of any advertisement is not to be construed as an endorsement of the product or service offered unless it is specifically stated in the ad that there is such approval or endorsement.

Articles are prepared as an educational service to members of ISBA. They should not be relied upon as a substitute for individual legal research.

The articles in this newsletter are not intended to be used and may not be relied on for penalty avoidance.

Postmaster: Please send address changes to the Illinois State Bar Association, 424 S. 2nd St., Springfield, IL 62701-1779.

## Chicago ordinance limiting the sale of cruelly raised animals upheld by the Seventh Circuit

CONTINUED FROM PAGE 1

here, the City of Chicago spent significant time researching the puppy mill issue. It found that consumers may not know, or have a way to know, that their new designer-breed puppy has come from a puppy mill;<sup>3</sup> and that they are repeatedly saddled with expensive veterinary bills and the emotional trauma of dealing with a sick or dying pet.<sup>4</sup> In addition, local animal shelters are affected because they receive puppy mill dogs and cats that consumers drop off when they no longer want or cannot afford the mounting medical costs for their new pets (for whom they have usually paid exorbitant prices). Those receiving shelters have limited capacity, and so they may be forced to resort to euthanizing more animals, which in turn makes the shelters more expensive to operate.<sup>5</sup> And while many healthy, socialized and reliable animals are available at low cost from local shelters, consumers are often fooled into thinking that a purebred dog is somehow a better value, when in fact the opposite is often true.

All of these problems and considerations led to the City of Chicago adopting Municipal Code §4-384-015 to regulate “Retail Sales of Dogs, Cats, and Rabbits” in Chicago (the “Ordinance”).<sup>6</sup> Under the Ordinance, retail pet stores in Chicago are only permitted to sell dogs and cats that come from “an animal control center, animal care facility, kennel, pound or training facility operated by any subdivision of local, state or federal government; or [ ] a humane society or rescue organization.”<sup>7</sup> In addition, any dog or cat offered for sale in Chicago must have basic background information disclosed and displayed on the animal’s cage.<sup>8</sup>

The Ordinance was set to take effect in March, 2015 but was quickly challenged in federal court by two pet stores selling specialty breed puppies in Chicago. The specialty breed pet stores alleged that the Ordinance violated the Commerce Clause of the U.S. Constitution<sup>9</sup> by unduly burdening interstate commerce, violated the Contracts Clause of the U.S. Constitution<sup>10</sup> by impairing existing contractual relationships, violated the Equal Protection and Takings

Clauses of the U.S. Constitution<sup>11</sup> (and Illinois’s equal protection<sup>12</sup> and “home rule” laws<sup>13</sup>), was preempted by the federal Animal Welfare Act, and was void for vagueness.<sup>14</sup> The U.S. District Court in the Northern District of Illinois, Hon. Jorge L. Alonzo, dismissed all of the pet stores’ claims and upheld Chicago’s Ordinance.<sup>15</sup> But the plaintiffs continued their fight and appealed to the Seventh Circuit.<sup>16</sup>

The Humane Society of the United States (HSUS) and Chicago’s The Puppy Mill Project (TPMP), both represented by Schiff Hardin LLP, were granted *amicus curiae* status at the outset of the case and filed briefs in both the district court and the Seventh Circuit addressing the legality and constitutionality of the Ordinance. On September 21, 2017, the appellate panel affirmed the district court’s order upholding the Ordinance.<sup>17</sup> The Seventh Circuit concluded that the Ordinance did not have a discriminatory effect on interstate commerce and did not exceed Chicago’s home-rule authority under the Illinois constitution. “Chicago has not attempted to regulate beyond its borders. The ordinance doesn’t ban animals from out-of-state breeders, either expressly or in practical effect. It affects large breeders — wherever they’re located — in exactly the same way. Both can sell directly to Chicago consumers,” but city-licensed pet retailers cannot be a conduit through which those puppy mill breeders sell to consumers in Chicago.<sup>18</sup>

While that appeal proceeded, the district court had declined to freeze enforcement of the Ordinance. The Ordinance therefore has been enforceable against all Chicago pet retailers since December 21, 2015. Consumers in Chicago should be aware of the puppy mill ban and expect that all retailers in Chicago are displaying the required pet disclosure information and selling only rescue dogs, cats, and rabbits, not young animals from breeders.

The Seventh Circuit’s affirmation continues the streak of victories for retail sales bans that seek to protect the health and safety of the animals who enter our

lives, and the public at large. The Seventh Circuit decision also marks a victory for the important principle that local governments have the right to enact animal protective legislation focusing on issues identified within the specific municipality. ■

1. Over 254 cities have enacted legislation to address the tragic consequences of puppy mill production. See <https://bestfriends.org/resources/states-local-pet-sale-bans>. California is the first state to have passed such a ban. See Cal. A.B. 485 (Oct. 13, 2017).

2. “The documented abuses of puppy and kitten mills include over-breeding; inbreeding; minimal to non-existent veterinary care; lack of adequate food, water and shelter; lack of socialization; lack of adequate space; and the euthanization of unwanted animals.” Journal of the Proceedings of the Chicago City Council (March 5, 2014).

3. “When consumers buy puppies, kittens, and rabbits from a pet store, there is a strong likelihood that consumers are unknowingly supporting the puppy mill, kitten mill, or rabbit mill industry.” *Id.*

4. “[H]ealth and behavioral issues, which may not present themselves until years after the purchase of the animals, can impose exorbitant financial and emotional costs on consumers.” *Id.*

5. In 2012, Chicago Animal Care and Control euthanized 7,652 dogs and cats, costing \$199,124 –\$251,384. *Id.* By encouraging animal adoptions from shelters, the shelters can reduce their operating expenses by reducing the number of annual euthanasia procedures.

6. The Ordinance regulates dogs, cats, and rabbits. The text of the Ordinance is available at [http://library.amlegal.com/nxt/gateway.dll/Illinois/chicago\\_il/municipalcodeofchicago?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:chicago\\_il](http://library.amlegal.com/nxt/gateway.dll/Illinois/chicago_il/municipalcodeofchicago?f=templates$fn=default.htm$3.0$vid=amlegal:chicago_il). Cook County has a similar law as well, which was upheld by the U.S. District Court (N.D. Ill.) on May 21, 2015, which decision is currently on appeal to the Seventh Circuit. *Missouri Pet Breeders Assoc. v. Cook Co., et al.*, Case No. 15-2895 (7th Cir.).

7. Ordinance, §4-384-015(b).

8. Illinois Animal Welfare Act, “Disclosures for Dogs and Cats Being Sold by Pet Shops.” 225 ILCS 605/3.15 (2017).

9. U.S. Const. art. 1, § 8, cl. 3.

10. U.S. Const. art. 1, § 10, cl. 1.

11. U.S. Const. Amend. XIV and V, respectively.

12. Ill. Const. art. I, § 2.

13. Ill. Const. art. 7 § 6.

14. 7 U.S.C. § 2131, *et seq.*

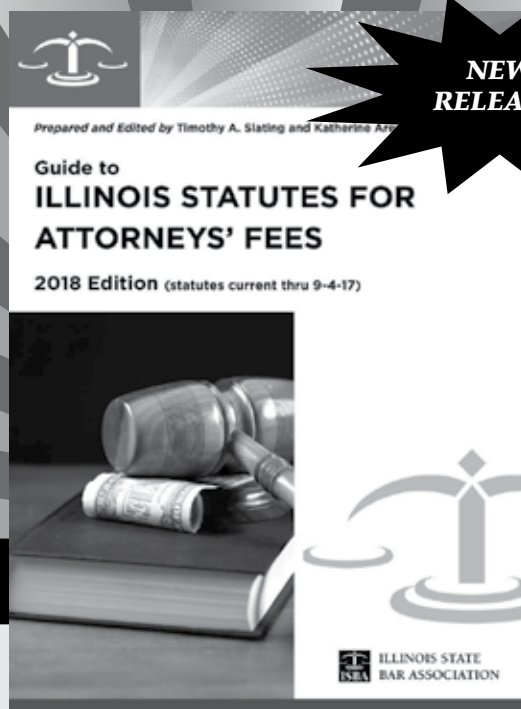
15. *Park Pet Shop, Inc. v. City of Chicago*, No. 15-C-1450, 2015 WL 6756288 (N.D. Ill. Nov. 5, 2015).

16. Not all of the pet stores’ claims were appealed to the Seventh Circuit.

17. *Park Pet Shop, Inc. v. City of Chicago*, 872 F.3d 495, 2017 WL 4173707 (7th Cir. Sept. 21, 2017).

18. *Id.*, Mem. Op. at 14.

**ARE YOUR FEES RECOVERABLE? Find out before you take your next case.**



## **GUIDE TO ILLINOIS STATUTES FOR ATTORNEYS' FEES**

### **2018 Edition** **(statutes current thru 9-4-17)**

The new edition of this essential guide lists all provisions in the Illinois Compiled Statutes that authorize the court to order one party to pay the attorney fees of another. No matter what your practice area, this book will save you time – and could save you and your clients money!

In the 2018 Edition you'll find new and updated listings on recoverable fees under the Uniform Commercial Code, Collection Agency Act, Public Aid Code, Code of Criminal Procedure, Code of Civil Procedure, Health Care Services Act, Labor Dispute Act, and many other statutes. This easy-to-use guide is organized by ILCS Chapter and Act number, and also includes an index with an alphabetical listing of all Acts and topics. It's a guide no lawyer should be without.

Order at [www.isba.org/store](http://www.isba.org/store)  
or by calling Janet at 800-252-8908  
or by emailing Janet at [Jlyman@isba.org](mailto:Jlyman@isba.org)

**Guide to Illinois Statutes for Attorneys' Fees - 2018 Edition**  
\$40.00 Members/\$57.50 Non-Members  
*(plus tax and shipping)*



Illinois has a history of  
some pretty good lawyers.  
We're out to keep it that way.

# “Property plus” – A new best interest standard for the family pet in marriage dissolution proceedings

BY ALICIA HILL RUIZ

---

**Counter to many of the “rankings” involving Illinois in recent years**, one area in which we have consistently ranked #1 (on a list that didn’t have the word “worst” in its title) is our animal protection laws. Thanks to the hard work and passion of many individuals over many years, Illinois has held the top spot in the Animal Legal Defense Fund’s “U.S. Animal Protection Laws Rankings” for the past nine years.

Illinoisans can be proud of this. At a time when pet ownership<sup>1</sup> as well as concerns about animal welfare have been on the rise, it is good to be ahead of the curve.

One of the benefits of this type of public acknowledgment is that other states can look to us as a model for how to improve laws in their own states. Concomitantly, one of our responsibilities is to continue to strive, not only to improve upon existing laws, but to be vigilant in our efforts to ensure that new laws “get it right” for animal welfare.

On January 1, 2018, Illinois begins its work as the first state to mandate that in any allocation of a marital asset companion animal under the Illinois Marriage and Dissolution of Marriage Act (“IMDMA”), the court “...shall take into consideration the well-being of the companion animal.”<sup>2</sup>

In criminal cases involving animals, e.g., animal cruelty, neglect, or abandonment, the evidence necessary to meet a burden of proof is easy to imagine: testimony, photos, video about specific actions or non-actions related to the animal. But how will civil practice attorneys go about gathering evidence to establish the “well-being” of a companion animal? Presumably, some consideration of this has already been in use as attorneys and judges have dealt with

pets as part of the allocation of marital asset property. But the new language now ensures that well-being will be considered and creates an opportunity for Illinois to again take the lead in establishing *how* it will be considered.

Many family law practitioners and judges are likely concerned about adding one more opportunity for conflict, chaos, and cost to their caseloads/dockets. Now, in addition to depositions and filings related to the best interests of the children, comes the prospect of testimony about Max and Tiger. For the embattled and beleaguered professionals working these cases, there is the very real possibility that these issues will be met with hostility or derision or simply ignored.

Those of us in the animal law community have an opportunity to help make the transition to the new requirement successful by helping attorneys and judges understand that knowledge from professionals who work with animals can bring order and reason through objective measures to the chaos of dueling claims and accusations about who should “get” the pet. To be sure, practical and procedural challenges about how to most effectively use this expertise will have to be addressed. Those issues will not be covered here, but certainly suggest subject matter for legal professionals to consider.

According to the 2017-2018 National Pet Owners Survey, 68% of American households (about 85 million families) own a pet. The same survey shows dogs at the top of the list of type of pet owned (60.2 million households). Assuming the percentages are similar for Illinoisans, we can assume that dogs will be involved in many of the cases that will be litigated

under the IMDMA.

So for the purposes of this article, we are going to focus on the well-being of dogs.

There are some basic needs that cross all dog breeds: food, shelter, veterinary care, exercise/play, and connection. Although the evidence that could be introduced to establish who buys the dog food and pays the vet bills seems pretty straightforward, the other needs can be more complex. Factors like environment, amount, quality, and type of exercise, as well as a given dog’s need for human connection can vary depending on the dog’s breed. All of these factors impact a dog’s physical and psychological health and should be included in an analysis of the dog’s well-being.

But how can attorneys find and effectively present this type of evidence to a judge? Fortunately, there is a lot of empirical research and information available related to canine psychology and well-being. Rather than examine all of the research, we created a hypothetical case and asked a canine behavior professional how she would evaluate the dog’s well-being.

Behesha Doan has more than 27 years of experience as a professional dog trainer. She is the Owner/Training Director of Extreme K9 and the Founder/Training Director for This Able Veteran, a non-profit organization that trains service dogs for veterans with PTSD. She currently operates three professional dog trainers’ schools including the Canine Behavioral Psychology Academy, the Search & Detection Academy and the Post Traumatic Stress Disorder Service Dog Trainers Academy from her training facility located in Carbondale, IL. She is a Certified Dog Trainer and Certified Service Dog

Trainer, as well as a talented speaker on the subject of dog behavioral psychology to audiences including veterinarians and legal professionals. She conducts dog behavior seminars throughout the United States, Canada and Europe. Her primary focus is advocating for the heretofore-unrecognized needs of dogs.<sup>3</sup>

**Q: Although the study of canine behavior and psychology has been around for quite some time, it may be unfamiliar to many lawyers and judges. So help us understand how it is that you (and other canine behaviorists) are able to assess a dog's psychological well-being.**

A: Primarily by observing their behavior in the home environment, training (or lack thereof) and especially important is a knowledge and understanding of dogs' breed traits which are genetically influenced regardless of the environment/training. Through decades of observing dogs (and wolves) in their own environments, we have learned about how they think and what their communication system is, and it is quite predictable, clear, and consistent. Dogs always prefer to be psychologically balanced and respond rather quickly to environments/situations that allow it. In order for them to be well-balanced and healthy, they require appropriate physical expression of both physical and mental energies as well as healthy, fulfilling connection with the human(s) who are responsible for them. Without all of these, dogs can experience inner chaos, anxiety, frustration, confusion, aggression, and reactivity in their behavior. Because domesticated dogs are dependent on humans to meet those needs, their behavior can tell us a lot about what is going on in their relationships with their humans. The quality of a relationship of any kind is determined by how well it meets the needs of the other member. A dog's mental and physical well-being is directly related to the quality of the relationships with the humans under whom they are dependent.

**Q: In a situation with a divorce, which**

**is generally pretty stressful, the quality of the relationships within the family are often strained, or, at a minimum, changing. But many people may not think about or understand how these changes impact the well-being of their four-legged family members. Let's look at a hypothetical case of a family with a dog so you can help us understand what factors would play into the dog's well-being.<sup>4</sup>**

### Hypothetical

*After 12 years of marriage, Mr. and Mrs. Jones are getting divorced, and the court has to decide who gets their dog Molly, a four-year-old Golden Retriever. They have two children ages 15 and 17. During the marriage, Mrs. Jones worked part-time and was primarily in charge of Molly's care, including taking her for regular walks, feeding her and taking her to the vet. After the separation Mrs. Jones now works two part-time jobs with irregular hours. She moved into an apartment in a building that allows dogs. She used to be a walker, but with the second job, she is finding it difficult to work this into her schedule and into their new environs. The children are currently living with Mrs. Jones. Both are busy with school, friends, and extracurricular activities. Although daily walks and time spent with Molly has diminished greatly, Mrs. Jones still enjoys a rich relationship with her. Mr. Jones is living in a rental house where there is a one-acre yard with a fence. He works 8-5 in an office and has recently started taking night classes.*

**Q: From the perspective of the dog's well-being, what factors would you consider in evaluating what would be best for Molly's well-being?**

A: In this case, I'm considering the fact that Golden Retrievers were bred to focus on, cooperate with, and interact closely with human beings. Relationship is a crucial component in their quality of life genetically. Even if other factors such as consistent exercise were not ideal, the quality of time spent in relationship with her caregivers would be more impactful to her quality of life. So, even though Mrs. Jones isn't exercising as much as

she used to, Molly would fare better by staying with Mrs. Jones and the children since her genetic needs are for frequent interaction and a more intense relationship.

**Q: OK, if the Jones's had a four-year-old-Husky (Balto), but everything else was the same, how would your analysis change?**

A. Huskies were bred to direct their focus outward, to be single-minded in their intensity and desire to run (think of pulling a sled), so Balto's genetic programming is telling him to run as fast and as far and he can go on a daily basis. Confinement for Huskies is difficult. Plenty of exercise will be a critical factor in his quality of life. Since Mrs. Jones has been unable to take her usual walks and the kids are busy, I would be inclined to recommend that he live with Mr. Jones. Although Huskies certainly do have relationship needs, in contrast to a Golden Retriever, those needs are less and their need for a consistent outlet for their energies and lots of exercise is significantly more. While not an ideal situation for Balto in either case, assuming that Mr. Jones is feeding him and spending some time with him, his well-being would be better served over all with Mr. Jones.

**Q: The law will allow for joint custody of pets. What are your thoughts about how these arrangements could affect a dog's well-being?**

A: I would say that joint custody is not a problem in and of itself, but the duration of time away from the more suitable home is definitely a factor. So, in our hypothetical, Balto could be in an apartment for a long weekend and Molly could be left in a fenced-yard away from her primary companions for a long weekend. However, longer periods outside the more suitable home would begin to exact a toll that would be unfair to the dog.

**Q: Are there any cases where you would not recommend any type of joint custody arrangement?**

A. Yes. There are certain breeds and

temperaments of dogs that are prone to anxiety and nervousness for which changing environments and changing caretakers could cause much more distress and subsequent behavioral problems. There are also some dogs that respond negatively to chaotic or unruly environments and would do far better in the most stable environment. A dog of any breed, due its own unique make-up or life experiences, might show signs of distress when moved back and forth.

**Q: So that brings us to the issue that each dog, regardless of its breed, or current behavior, will have its own particular needs that will change over time. So, although a dog is still considered property, the court's responsibility in "allocating" the dog, now that "well-being" must be considered, is fundamentally different than its responsibility in allocating something like a piece of furniture. It seems like there will need to be some agreement in the disposition that whoever gets the dog is going to be capable of recognizing and fulfilling its particular needs over time. Since this is a new way of looking at these cases, what would be your overarching or general advice for lawyers and judges as they begin this work?**

A: First I would ask them to recognize that dogs are conscious beings that deserve a good quality of life and that there are many factors that contribute to that quality of life. Because dogs do not share a common language with humans, the only voice they have in the judicial system is the voice that lawyers and judges give them. I would ask them to be open to listening to those of us who have the insight and experience to speak for the well-being of the dogs and other types animals that are caught in these cases. I would also ask them to be mindful of the difference between an owner who Loves the dog and an owner who is willing and able to take actions that will truly serve the dog's well being. In the hypothetical we looked at, both Mr. and Mrs. Jones presumably care about the dog and are good *to* the dog,

but the question is who is better *for* their dog. ■

Behesha Doan will be a presenter in two sessions at the ISBA's Animal Law Conference on February 9, 2018 at Southern Illinois University School of Law in Carbondale. Learn more about the conference/CLE program at <https://www.isba.org/cle/upcoming>.

1. According to the American Pet Products Association's March 23, 2017 press release, PET INDUSTRY'S MOST COMPREHENSIVE CONSUMER RESEARCH STUDY RELEASED, FINDING MILLENNIALS AS PRIMARY PET-OWNING DEMOGRAPHIC, "[p]et ownership, in general, is up and The Survey shows a new generation of pet owners contributing to that growth. Gen Y/ millennial pet ownership has officially surpassed baby-boomer ownership by three percentage points to now account for 35 percent of all pet owners."

2. Although Alaska enacted similar legislation that became effective last January, their statute says the court "may" take the pets well being into consideration.

3. Additionally, Ms. Doan is a former approved instructor for the Illinois Law Enforcement Training & Standards Board for Law Enforcement Narcotic Detection, K-9 Certification, Remote Collar Training for K-9 Reliability; and Police K-9 Unit Tactical Operations. She is a professional member of the International Association of Canine Professionals (IACP) and is a Certified Dog Trainer & Certified Service Dog Trainer through IACP as well. A more complete bio is available at [www.thisableveteran.org](http://www.thisableveteran.org).

4. Each animal's interaction with his or her environment and human companions is unique. Accordingly, the well-being analysis will necessarily be more complex than what we can illustrate within the space of this article. This short hypothetical is intended to demonstrate the types of factors that a behaviorist would consider.

# ISBA WEBSITE FOR NEW LAWYERS

CONTENT & VIDEO CURATED FOR LAWYERS IN THEIR FIRST 5 YEARS OF PRACTICE



- **TOP 5** Articles distilled into quick takeaways
- **JOB OPPORTUNITIES** Up-to-date listings
- **YOUNG LAWYERS DIVISION INFO** News, photo galleries and upcoming events
- **MCLE TOOL** For determining your MCLE compliance and reporting deadlines
- **QUICK VIDEOS** Covering tech tips and practice pointers
- **MEMBERSHIP INFO** Learn about our benefits designed for new lawyers
- **TWITTER FEED** Stay in the know and connect with other ISBA young lawyers online
- And more!



ILLINOIS STATE  
BAR ASSOCIATION

FIND US ONLINE @  
**ISBA.ORG/NEWLAWYERS**

## ANIMAL LAW

ILLINOIS BAR CENTER  
SPRINGFIELD, ILLINOIS 62701-1779

NOVEMBER 2017

VOL. 9 NO. 2

Non-Profit Org.  
U.S. POSTAGE  
PAID  
Springfield, Ill.  
Permit No. 820



## ORDER YOUR 2018 ISBA ATTORNEY'S DAILY DIARY TODAY!

*It's still the essential timekeeping tool for every lawyer's desk and as user-friendly as ever.*

**A**s always, the 2018 Attorney's Daily Diary is useful and user-friendly.

It's as elegant and handy as ever, with a sturdy but flexible binding that allows your Diary to lie flat easily.

The Diary is especially prepared for Illinois lawyers and as always, allows you to keep accurate records of appointments and billable hours. It also contains information about Illinois courts, the Illinois State Bar Association, and other useful data.



The ISBA Daily Diary is an attractive book, with a sturdy, flexible sewn binding, ribbon marker, and rich, dark green cover.

**Order today for \$30.00** (Plus \$5.94 for tax and shipping)

*The 2018 ISBA Attorney's Daily Diary*

**ORDER NOW!**

Order online at

<https://www.isba.org/store/merchandise/dailydiary>  
or by calling Janet at 800-252-8908.