

1 STATE OF MINNESOTA DISTRICT COURT

2 COUNTY OF DAKOTA FIRST JUDICIAL DISTRICT

3 - - - - -

4 Teresa Lynn Petter, Wolves
5 Woods & Wildlife, a Minnesota
6 Corporation, Daniel Robert Storlie,
and Fur-Ever Wild, Ltd, a
Minnesota corporation,

7 Plaintiffs-Petitioners,

8 vs. File No. 19HA-CV-12-112

9 Town of Eureka,

10 Defendant-Respondent.

11 - - - - -

12 **CONDENSED**

13 DEPOSITION OF
14 TERESA LYNN PETTER (PRO SE)
15 DECEMBER 19, 2012
16 11:00 A.M.

17
18
19
20

21 **COPY**

22 JEFFREY G. KELZER
23 KINSELLA, HARTIGAN & KELZER
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204 Union Plaza Building
25 Minneapolis, Minnesota 55401
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KINSELLA, HARTIGAN & KELZER, INC.



1 Taken pursuant to Notice and Agreement of
2 Counsel, and taken before Jeffrey G. Kelzer,
3 Notary Public in and for the County of Hennepin,
4 State of Minnesota, at 9321 Ensign Avenue South,
5 Bloomington, Minnesota.

6 * * *
7
8 APPEARANCES:
9 On Behalf of Ms. Petter:
10 (Pro Se)

11 On Behalf of the Town of Eureka:
12 STEPHANIE A. ANGOLKAR, ESQ.
13 Iverson Reuvers
14 9321 Ensign Avenue South
15 Bloomington, Minnesota 55438

16 On Behalf of the Town of Eureka:
17 CHAD D. LEMMONS, ESQ.
18 Kelly & Lemmons, P.A.
19 900 Crossroads
20 7300 Hudson Boulevard
21 St. Paul, Minnesota 55128

22 I-N-D-E-X
23 EXAMINATION BY: PAGE:
24 Ms. Angolkar 4
25 Mr. Lemmons 81

EXHIBIT MARKED: DESCRIPTION.
1 42 List of animals
KINSELLA, HARTIGAN & KELZER, INC.

1	2	60	Advertisement
2	3	61	Hours, location off website
3	4	63	Winter Wonderland hours
4	5	64	Hours, location off website
5	6	72	Photo of sign
6	7	72	Photo of sign
7	8	72	Photo of sign
8	9	72	Photo of sign
9	10	72	Photo of sign
10	11	72	Photo of sign
11	12	72	Photo of sign

12
13 DOCUMENT REQUESTS: PAGE
14
15 PAGE
16 WITNESS INSTRUCTED NOT TO ANSWER
17 OBJECTIONS PAGE
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19
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4 WHEREUPON, the following proceedings transpired:
5 TERESA LYNN PETTER
6 a witness in the above-entitled
7 action, after having been first
8 duly sworn, was examined and
9 testified as follows:

10 EXAMINATION:
11 BY MS. ANGOLKAR:
12 Q. Ms. Petter, we met off the record. My name is
13 Stephanie Angolkar. And I'm one of the attorneys
14 representing the Township in this case. Have you
15 ever had a deposition taken before?
16 A. No.
17 Q. Okay. Well, basically we have a court reporter
18 here and he types everything that we're saying.
19 So even though we can see each other and can --
20 if I see you nod or something like that, I know
21 that you are nodding; but since he's making a
22 record, it's important to vocalize your
23 responses. So, for example, if you are nodding,
24 I might remind you to say your response, if it
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1 was a yes. Or if you were shaking your head, I
2 might remind you to vocalize your response if
3 that was a no. And then that creates a
4 transcript of the testimony.
5 Similarly you might know where I'm going
6 with a question and may be ready to respond, but
7 to just still wait for me to finish the question
8 and then for you to finish your response. And
9 then I'll also try to wait for you to finish your
10 answers before I ask another question.
11 If you don't understand a question, let me
12 know and I'll try to rephrase it so that you do
13 understand the question.
14 If you need a break at any time, let me
15 know. We have restrooms outside of the
16 conference room and beverages here.
17 A. I'm sorry.
18 Q. That's okay. I understand.
19 A. I'm recording, so I can't just shut it off.
20 Q. Yes. If there is -- just if there is a way if
21 you are able to silence it, mute it while you are
22 recording, then that's no problem.
23 A. Okay.
24 Q. Okay. Can you state your full name for the
25 record.

1 **A. Teresa Lynn Petter.**
 2 **Q.** Have you been known by any other name?
 3 **A. Terri.**
 4 **Q.** Okay. Just as a nickname. Any other last name?
 5 **A. No.**
 6 **Q.** Okay. And your date of birth?
 7 **A. 7/31/74.**
 8 **Q.** And are you currently employed?
 9 **A. No. Self-employed.**
 10 **Q.** Self-employed. Okay. And what is the nature of
 11 your self-employment?
 12 **A. I'm a farmer.**
 13 **Q.** Okay. What is your current residential address?
 14 **A. 10132 - 235th Street West.**
 15 **Q.** Do you own that property?
 16 **A. Yes.**
 17 **Q.** And how long have you owned the property?
 18 **A. Fourteen years.**
 19 **Q.** And have you resided on it all 14 years as well?
 20 **A. Yes.**
 21 **Q.** Okay. Is that in Lakeville?
 22 **A. Yes.**
 23 **Q.** Prior to that where did you live?
 24 **A. 24005 Dodd.**
 25 **Q.** Okay.

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1 **A. Right next door.**
 2 **Q.** Okay. So that's also in Lakeville?
 3 **A. Yes.**
 4 **Q.** Okay. And how long did you live there?
 5 **A. Since '93.**
 6 **Q.** Okay. Have you ever been involved in litigation
 7 before, in a lawsuit?
 8 **A. Yes.**
 9 **Q.** Okay. And was that as a plaintiff or a
 10 defendant?
 11 **A. A defendant.**
 12 **Q.** Okay. Do you know when that was? Just a year
 13 approximately.
 14 **A. '08.**
 15 **Q.** Okay. And just generally what type of case was
 16 that?
 17 **A. It was for cows, longhorns.**
 18 **Q.** Okay. What do you mean by that?
 19 **A. People abandoned them on my property.**
 20 **Q.** Okay. And who -- and somebody sued you for
 21 that?
 22 **A. They abandoned them on -- they were leasing out**
 23 **my pastures and they abandoned them and didn't**
 24 **feed them anymore. So I took them and fed them**
 25 **and then I sold them.**

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1 **Q.** Okay. And then they sued you?
 2 **A. For the amount of the cows.**
 3 **Q.** Okay. What was the result of that lawsuit?
 4 **A. I had to pay them half of what I got out of the**
 5 **cows because I got the other half for feeding**
 6 **them and doing all the work.**
 7 **Q.** Okay. Any other lawsuits that you've been
 8 involved in?
 9 **A. No.**
 10 **Q.** Okay. And have you ever been convicted of a
 11 crime?
 12 **A. Speeding.**
 13 **Q.** Okay. Who hasn't had a speeding ticket?
 14 **A. Seat belts.**
 15 **Q.** Okay. Well, as you know, we're probably going
 16 to be diving in quite a bit to talk about -- you
 17 mentioned that you were a farmer, and so to talk
 18 about some of those activities. So first I'm
 19 wondering -- I have questions about the different
 20 entities.
 21 And so first, what can you tell me about
 22 the purpose or the mission of Wolves, Woods and
 23 Wildlife?
 24 **A. WWW is a nonprofit and they are the traveling**
 25 **portion. They are an education portion. And**

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1 **they are the ones that travel.**
 2 **Q.** Okay. And what's the ownership structure of
 3 WWW?
 4 **A. What do you mean, like corporation?**
 5 **Q.** Or who, like, who owns it?
 6 **A. Well, it's a nonprofit. It's a corporation. So**
 7 **there is a board and.**
 8 **Q.** Okay. How many board members are there?
 9 **A. Four.**
 10 **Q.** Okay. And who are the board members?
 11 **A. I am, and then Adam Shimp and Eunice Petter and**
 12 **Aliesha Meyer.**
 13 **Q.** Okay. And if a decision has to be made for WWW,
 14 is that done collectively by the whole board or?
 15 **A. It depends on the decision.**
 16 **Q.** Okay. What types of decisions does the whole
 17 board make?
 18 **A. Usually the decisions we do on what shows we do.**
 19 **Q.** Okay.
 20 **A. And prices on shows.**
 21 **Q.** What are some examples of the shows that WWW
 22 does?
 23 **A. The Dakota County Fair. We also do schools.**
 24 **Q.** Does WWW own the animals that are involved in
 25 the show?

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1 **A. No.**
2 **Q.** No. Okay. And so do they lease them from
3 Fur-Ever Wild?
4 **A. They lease them from me.**
5 **Q.** Okay. Lease from you. Okay. So the animals
6 are then -- are they technically then owned by
7 you personally?
8 **A. Yes.**
9 **Q.** Okay. And with regards to WWW, what types of
10 animals does that entity display?
11 **A. North American fur bearing wildlife.**
12 **Q.** Okay. Can you give me some examples of the
13 animals that you bring on the shows?
14 **A. Depends on the show.**
15 **Q.** Okay.
16 **A. Depends on the time of year. Sometimes we just**
17 **bring, you know, one or two. It could be just a**
18 **raccoon. There are some places where we bring**
19 **some of the agricultural animals, like the goats**
20 **or the pigs or sometimes we bring in a full setup**
21 **like the wolves, the Cougars, the raccoons, the**
22 **skunks, the fox.**
23 **Q.** Okay. Is that a decision that you make with the
24 host of the event of --
25 **A. Yes.**

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1 **Q.** Okay.
2 **A. And it depends on who we're educating that day.**
3 **Q.** Okay. How long has WWW been in existence?
4 **A. '96.**
5 **Q.** Okay.
6 **A. I'm sorry. 2006.**
7 **Q.** Okay. No problem. Was it known by any other
8 name before that or was it a brand new --
9 **A. It was a new organization.**
10 **Q.** -- organization? It was new. Okay. So in 2006
11 when WWW was formed, did you personally already
12 own the animals that would be used by WWW?
13 **A. Yes.**
14 **Q.** Okay. Is WWW still active today?
15 **A. Yes.**
16 **Q.** Okay.
17 **A. Well, I wouldn't say today we're active. When**
18 **we go out and do shows.**
19 **Q.** Okay. Sure. But it's an entity that still
20 exists?
21 **A. Yes.**
22 **Q.** Does WWW have any employees?
23 **A. No.**
24 **Q.** How about volunteers?
25 **A. They have volunteers.**

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1 **Q.** Okay. And approximately how many volunteers
2 does WWW have?
3 **A. It ranges dramatically. You can have anywhere**
4 **from one to ten.**
5 **Q.** Okay. And is that something -- or how does
6 somebody become a volunteer?
7 **A. You have an application you have to fill out.**
8 **And then you have a recommendation form, and then**
9 **you have to come in for an interview.**
10 **Q.** And what do the volunteers do for WWW?
11 **A. They usually go to shows.**
12 **Q.** Okay.
13 **A. Help set them up and then help talk to people**
14 **and help tear down.**
15 **Q.** Do they provide services to any other entity
16 that you are involved with, or do they just
17 exclusively volunteer with WWW?
18 **A. It depends on where we're at.**
19 **Q.** Okay.
20 **A. It depends on if we're at a show. You know, I**
21 **have some friends that come out and help me. It**
22 **all depends on -- so the volunteers can go back**
23 **and forth either just to help me or to volunteer**
24 **for that.**
25 **Q.** Okay. Now you said that WWW was new in 2006.

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1 Was that on your current property? Did they
2 operate on your current property?
3 **A. It's a traveling show.**
4 **Q.** Okay.
5 **A. So, that's kind of a...**
6 **Q.** Okay. And I can rephrase the question if
7 that -- if it doesn't make sense. So let me back
8 up. Does WWW hold any events on your property?
9 **A. Once in a while. Not a lot.**
10 **Q.** When WWW does hold events on your property, like
11 what types of events are those?
12 **A. I wouldn't really call them events. If a Girl**
13 **Scout Troop or a Boy Scout Troop, or we've had**
14 **some handicapped schools come in, that's what we**
15 **do there.**
16 **Q.** Okay. So what happens when they would come to
17 your property?
18 **A. We give them agri-tours.**
19 **Q.** And what's involved in that?
20 **A. We go around and we show them about farm life.**
21 **Depends on what -- depends on what they are**
22 **capable of doing. Some of the handicapped, you**
23 **know, homes and facilities that we really can't**
24 **have them, you know, get in there and learn about**
25 **brushing a horse; or learn about, you know, what**

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1 **it is to clean, you know, goat areas. Or, you**
 2 **know, even how to -- you know, some Boy Scouts**
 3 **and Girl Scouts, we come in and teach them about,**
 4 **you know, trapping or fur or skinning or, you**
 5 **know, that kind of stuff. So it depends on the**
 6 **group.**
 7 **Q. Okay.**
 8 **A. We have a lot of physically handicapped people**
 9 **come in. It's not like everybody can do**
 10 **everything.**
 11 **Q. Okay. So I guess first if you had a group that**
 12 **didn't have any physical disabilities, where do**
 13 **they -- where do they go on the property? Do you**
 14 **have like an area set up for them, or is it --**
 15 **can they go anywhere on the property?**
 16 **A. They can't go anywhere because we're federally**
 17 **regulated.**
 18 **Q. Okay.**
 19 **A. So they can only go to spots where we have what**
 20 **we call human barriers.**
 21 **Q. And what does that mean?**
 22 **A. It's a -- depends on the animals. Anywhere from**
 23 **a three to six-foot barrier on the other side of**
 24 **the cage, so the people can't get right up to the**
 25 **animals.**

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1 **A. There is only about a quarter of them that are**
 2 **able to be viewed.**
 3 **Q. Okay.**
 4 **A. They are not all -- because you have your**
 5 **breeders, you have your babies, you have your**
 6 **feeder hogs, you know, those aren't able to be**
 7 **viewed.**
 8 **Q. Okay. Is it a few of each animal that are**
 9 **viewable?**
 10 **A. Usually, yes.**
 11 **Q. Okay. Just not all of each type of animal?**
 12 **A. Right.**
 13 **Q. Okay. So, for example, say like a Girl Scout**
 14 **Troop, if they come on, would they be able to see**
 15 **the wolves?**
 16 **A. They can see some.**
 17 **Q. Okay. Or the wolves that you've chosen to show?**
 18 **A. They can see probably a quarter of them.**
 19 **Q. Okay. Do you have like a separate area for the**
 20 **wolves that are not --**
 21 **A. Yes.**
 22 **Q. -- viewable? Okay. Are there some indoor areas**
 23 **for the animals as well?**
 24 **A. For people to see? No.**
 25 **Q. Just generally?**

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1 **Q. Okay.**
 2 **A. And that's federal regulation.**
 3 **Q. Is that for certain animals?**
 4 **A. It's for everything except for chickens and**
 5 **horses.**
 6 **Q. Okay.**
 7 **A. It is for pigs, goats, everything.**
 8 **Q. Okay. What animals are on the property?**
 9 **A. All of them. We have --**
 10 **Q. As many as you are able to think of right here.**
 11 **A. We have horses, goats, pigs, feeder hogs and**
 12 **then we have sheep, and then we go into wolves,**
 13 **Cougars, fox, raccoons, skunks, Bobcats, Links,**
 14 **prairie dogs, porcupines, woodchucks. Those I**
 15 **think are what we have now.**
 16 **Q. Okay. So for the animals, are they then set up**
 17 **in their own, like a fenced area for each of the**
 18 **species?**
 19 **A. Yes.**
 20 **Q. Okay. Are all of those animals able to be**
 21 **viewed --**
 22 **A. No.**
 23 **Q. -- if a group comes? Okay. Which ones are not**
 24 **accessible to be viewed or nobody is able to view**
 25 **them?**

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1 **A. Yes. They are in my barn.**
 2 **Q. Okay. And those --**
 3 **A. Or my barns.**
 4 **Q. Okay. And do the -- and I think maybe you were**
 5 **getting at this, but I just want to ask the**
 6 **question so we have a clear record. So like a**
 7 **Girl Scout Troop, are they able to go into one of**
 8 **the barns to see the animals?**
 9 **A. No.**
 10 **Q. Okay. So they have to be outside to see them?**
 11 **A. Yes.**
 12 **Q. Okay. Before I go too far ahead, also I want to**
 13 **ask you about Fur-Ever Wild. What is the type of**
 14 **structure for Fur-Ever Wild, or what kind of**
 15 **entity is that?**
 16 **A. There is two Fur-Ever Wilds.**
 17 **Q. Okay. So I guess what's the first one?**
 18 **A. One is Fur-Ever Wild, Limited.**
 19 **Q. Okay. What's the other one?**
 20 **A. Fur-Ever Wild, just a proprietorship.**
 21 **Q. Like a sole proprietorship?**
 22 **A. Yes.**
 23 **Q. Okay. Is that registered with the State?**
 24 **A. The sole proprietorship?**
 25 **Q. Yes.**

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1 **A. Yes.**
 2 **Q.** And is the limited company also registered?
 3 **A. Yes.**
 4 **Q.** Okay. And first, what is the ownership
 5 structure of the limited company?
 6 **A. You mean --**
 7 **Q.** Fur-Ever Wild Limited?
 8 **A. You mean if it's a corporation?**
 9 **Q.** Of the owner -- of who is the owner, or who are
 10 the owners?
 11 **A. There is a board.**
 12 **Q.** Okay. Who is on the board?
 13 **A. There is three.**
 14 **Q.** All right.
 15 **A. Adam Shimp, Dan Storlie and Jay Petter.**
 16 **Q.** And then you said that there is the sole
 17 proprietorship. Who is the owner of that?
 18 **A. I am.**
 19 **Q.** Okay. When was the sole proprietorship formed?
 20 **A. Three months ago. Two months ago.**
 21 **Q.** Okay. And when was Fur-Ever Wild Limited
 22 formed, if you know?
 23 **A. 2000 and -- I'm trying to think -- '11.**
 24 **Q.** Okay. Prior to Fur-Ever Wild Limited being
 25 formed, was that known by any other name?
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1 farm are on your property?
 2 **A. Yes.**
 3 **Q.** Okay.
 4 **A. Well, there is, depending on -- there is two**
 5 **properties.**
 6 **Q.** Okay. And on your address for 10132 - 235th
 7 Street?
 8 **A. There is hogs and fur.**
 9 **Q.** Okay. On that property?
 10 **A. Yes. And on the other one there is hogs and fur**
 11 **on there also.**
 12 **Q.** And what's the other one?
 13 **A. The 24005.**
 14 **Q.** Okay. And when you say they are right next to
 15 each other, I guess I just want to back up and
 16 make sure we have a clear record.
 17 **A. They adjoin each other.**
 18 **Q.** Okay. Have they always been separate parcels?
 19 **A. Yes.**
 20 **Q.** Okay.
 21 **A. I bought them separately.**
 22 **Q.** Which parcel do you reside on?
 23 **A. The 235th.**
 24 **Q.** Is there any residence on the Dodd property?
 25 **A. Yes.**
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1 **A. No.**
 2 **Q.** Okay.
 3 **A. Well, basically Fur-Ever Wild limit is just my**
 4 **ranch name.**
 5 **Q.** Okay.
 6 **A. And we used to call it Spirit Ranch Two.**
 7 **Q.** And when you called it Spirit Ranch, was that
 8 just what you called it or was that a registered
 9 name with the State?
 10 **A. It wasn't registered.**
 11 **Q.** Okay. What does Fur-Ever Wild Limited do?
 12 **A. It is basically the ranch. So, it's a hog farm.**
 13 **And we also do corn and we also fur.**
 14 **Q.** With the corn, is that something that you
 15 harvest directly or do you lease out for corn
 16 harvest?
 17 **A. I lease out for corn. Well, I lease out for**
 18 **trade for hay, because that used to be my**
 19 **hayfield. So then they pay me, plus I get hay.**
 20 **Q.** Okay. How long have you operated the hog farm?
 21 **A. A year.**
 22 **Q.** Okay. And then how long have you operated the
 23 fur farm?
 24 **A. Seven years.**
 25 **Q.** Okay. And that's both the hog farm and the fur
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1 **Q.** Okay. Do you rent that out?
 2 **A. Yes.**
 3 **Q.** Okay. And so, it sounds like you have animals
 4 then on both parcels; is that correct?
 5 **A. Yes.**
 6 **Q.** Okay. Earlier when I was asking about people
 7 coming to look at some of the animals, would that
 8 mean that they also may set foot on the Dodd
 9 parcel?
 10 **A. No.**
 11 **Q.** Okay. So if they are going to look at any of
 12 the animals, that would exclusively be on the
 13 235th Street parcel?
 14 **A. Yes.**
 15 **Q.** Okay. And so is the Dodd parcel just used
 16 for -- just for raising animals for operation?
 17 **A. We sell hog food out of there also.**
 18 **Q.** Okay. Would selling the hog food out of the
 19 Dodd Avenue parcel, is that -- or is it Dodd
 20 Road?
 21 **A. Dodd Boulevard.**
 22 **Q.** Dodd Boulevard.
 23 **A. That's where we warehouse it.**
 24 **Q.** Is that like a structure that somebody goes to
 25 buy the hog food?
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1 **A. We just warehouse it there?**
 2 **Q.** Okay. So if somebody wanted to buy the hog
 3 food, where would they actually have to
 4 physically go to purchase it?
 5 **A. We deliver it.**
 6 **Q.** Okay. So they would have to call you for a
 7 delivery?
 8 **A. Yes.**
 9 **Q.** Okay. Just so that we understand each other, as
 10 I go forward and ask questions about the
 11 property, I'm just going to be referring to the
 12 property that you reside on and that where people
 13 may come to visit. So the 235th Street, unless I
 14 specifically ask you about Dodd Boulevard. But
 15 if you are confused, let me know and then I'll
 16 make sure it's clear of which property I'm asking
 17 about.
 18 **A. Okay.**
 19 **Q.** And then actually just so I understand, what
 20 direction is the Dodd Boulevard property from the
 21 parcel on 235th Street?
 22 **A. Southeast.**
 23 **Q.** Okay. Now, you mentioned Fur-Ever Wild,
 24 Limited. Does the hog farm have corn and also
 25 does the fur farm. In the day-to-day operations,
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1 do you just personally own them?
 2 **A. I personally own them.**
 3 **Q.** Okay. Which animals are raised for fur?
 4 **A. They all are.**
 5 **Q.** So the animals that you would --
 6 **A. Except for the pigs.**
 7 **Q.** Okay. Sure.
 8 **A. And the goats. Those are raised for meat.**
 9 **Q.** Okay.
 10 **A. And the horses are raised for meat, but we --**
 11 **this is going to sound horrible. We also sell**
 12 **the horses to taxidermists.**
 13 **Q.** Okay. Now, when -- you know, I really don't
 14 know anything about fur farming. So is there
 15 kind of a schedule that you have for each animal
 16 as to when they will be put down and skinned or
 17 is it something --
 18 **A. Sorry. I thought I turned that off.**
 19 **Q.** Okay. Or is it something that you wait until
 20 the animal dies naturally?
 21 **A. It depends.**
 22 **Q.** Okay. What does it depend on?
 23 **A. It depends on the fur market.**
 24 **Q.** Okay.
 25 **A. It depended last year if I had a barn to skin in**
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1 who makes the decisions?
 2 **A. I do.**
 3 **Q.** Okay. Does anybody else on the board have
 4 authority for the day-to-day decisions for
 5 Fur-Ever Wild, Limited?
 6 **A. Well, we all converse on it.**
 7 **Q.** Okay.
 8 **A. We all making decisions on like what animals are**
 9 **going that year, what we're breeding, what we're**
 10 **not.**
 11 **Q.** Okay. And does Fur-Ever Wild, Limited, the
 12 organization, own any animals?
 13 **A. No. Well, they own pigs.**
 14 **Q.** Okay. And does Fur-Ever Wild, the sole
 15 proprietorship, own any of the animals?
 16 **A. Well, all of them, except for the pigs.**
 17 **Q.** Okay. And just so that I'm clear, earlier when
 18 you had made a list of animals that are on the
 19 property, are those actually owned by Fur-Ever
 20 Wild, the sole proprietorship?
 21 **A. Yes.**
 22 **Q.** Okay. So not you as an individual, but by
 23 Fur-Ever Wild, the sole proprietorship?
 24 **A. That is me.**
 25 **Q.** And I mean is it the structure that owns them or
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1 **or not. So, last year we sold whole carcasses,**
 2 **if you want to call it that, because we had no**
 3 **place to skin. So, last year we didn't get to**
 4 **pelt anything. So then this year there is a lot**
 5 **of wolves. And then we never got to breed last**
 6 **year, so there is no foxes to pelt, or raccoons**
 7 **or skunks.**
 8 **Q.** Have you pelted anything in the last few months?
 9 **A. I pelted two wolves last night.**
 10 **Q.** Okay.
 11 **A. And there is another two going tonight. And as**
 12 **soon as my vet, which he heard when I was**
 13 **talking, I get my romp, then the rest of them go.**
 14 **There will be 25 within the next three weeks --**
 15 **two weeks.**
 16 **Q.** And who do you sell the pelts to?
 17 **A. It depends on the fur market.**
 18 **Q.** Okay.
 19 **A. Some of them go to Toronto, some of them go to a**
 20 **guy in Indianapolis, some of them go to another**
 21 **fur dealer named Hannibal. There is another guy**
 22 **named Danny down in Waseca. Some of them we sell**
 23 **straight to taxidermists?**
 24 **Q.** Now, you mentioned wolves. Is there any other
 25 animal that you've pelted in the last few months?
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- 1 **A. We pelted a fisher. And -- because right now**
- 2 **we're pelting. It just started, pelting season.**
- 3 **So what we have in the past few months, or what**
- 4 **we will in the next few months, that's a big**
- 5 **difference because it's just getting cold.**
- 6 **Q.** So when is pelting season?
- 7 **A. It starts right about now.**
- 8 **Q.** Okay. How long does it last?
- 9 **A. Three weeks.**
- 10 **Q.** Okay. Is there a reason that it -- is it the
- 11 same time every year?
- 12 **A. No.**
- 13 **Q.** Okay. How do you determine when pelting season
- 14 ends?
- 15 **A. Depends on the weather.**
- 16 **Q.** Okay.
- 17 **A. It depends on what the -- if it's cold out. It**
- 18 **depends on how fast they blow their prime coats.**
- 19 **It depends on the animals. Some of them that are**
- 20 **younger don't get primed fur right away. Some of**
- 21 **them, you know, that are older get their winter**
- 22 **coat earlier.**
- 23 **Q.** Okay. So does the weather affect the value of
- 24 their fur?
- 25 **A. Uh-huh.**

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- 1 **Q.** Okay.
- 2 **A. Well, I wouldn't say it affects the value. It**
- 3 **depends on when they get their coats.**
- 4 **Q.** Okay. And I guess I should say quality of their
- 5 fur. Did you know what I meant by value? The
- 6 quality of their fur?
- 7 **A. I wouldn't say it does the quality. It just**
- 8 **depends on when it comes in, the timing.**
- 9 **Q.** So is it possible that an animal can end up with
- 10 a nice quality fur in the summer?
- 11 **A. No.**
- 12 **Q.** No. Okay.
- 13 **A. It has to be in the winter. That's when their**
- 14 **winter coat comes in.**
- 15 **Q.** Okay.
- 16 **A. It's called "in prime".**
- 17 **Q.** "In prime"?
- 18 **A. Prime.**
- 19 **Q.** Okay. And what buildings do you use for the
- 20 pelting?
- 21 **A. Well, this year we'll use our barn.**
- 22 **Q.** Okay.
- 23 **A. That I wasn't allowed to be in last year at this**
- 24 **time.**
- 25 **Q.** And so that's the new barn?

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- 1 **A. Yes.**
- 2 **Q.** Okay. Now, you've mentioned -- we have talked
- 3 about WWW, Fur-Ever Wild Limited and Fur-Ever
- 4 Wild the sole proprietorship. Is there any other
- 5 entity or business that you are involved in?
- 6 **A. Yes.**
- 7 **Q.** Okay. And what's the -- what is that?
- 8 **A. Well, the d/b/a, Spirit Ranch Livestock. And**
- 9 **that's what we sell the hog food under.**
- 10 **Q.** Okay.
- 11 **A. But that's just a d/b/a. And then there is**
- 12 **Spirit Ranch One and Two. Those are what my**
- 13 **conditional use permits are under.**
- 14 **Q.** Okay.
- 15 **A. And that's boarding and breeding and sales of**
- 16 **horses, cattle and dogs. And that's for both**
- 17 **properties. That's why Spirit Ranch One and Two.**
- 18 **Q.** Does Spirit Ranch One go with one of the parcels
- 19 and Spirit Ranch Two with the other?
- 20 **A. Yes.**
- 21 **Q.** Okay. Which parcel goes with Spirit Ranch One?
- 22 **A. That's the 24005.**
- 23 **Q.** Okay. Dodd?
- 24 **A. Yes.**
- 25 **Q.** Okay. And then the Spirit Ranch Two goes with

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- 1 the 235th Street?
- 2 **A. Yes.**
- 3 **Q.** Okay. And are those, the Spirit Ranch One and
- 4 Two, are those operations still going on today?
- 5 **A. Yes.**
- 6 **Q.** Okay. And then when you said Spirit Ranch
- 7 Livestock as a d/b/a, does that then fall under
- 8 the registered -- the registered name of Fur-Ever
- 9 Wild?
- 10 **A. That's just under me.**
- 11 **Q.** Okay. And then d/b/a, does business as Spirit
- 12 Ranch Livestock?
- 13 **A. Yes.**
- 14 **Q.** Okay. Any other entities or business you are
- 15 involved in?
- 16 **A. No. Oh, yes. I'm a K-Bid affiliate.**
- 17 **Q.** Can you spell K-Bid?
- 18 **A. Just K-Bid. K - B-i-d.**
- 19 **Q.** K-Bid?
- 20 **A. Yes.**
- 21 **Q.** What is K-Bid?
- 22 **A. It's an on-line auction service.**
- 23 **Q.** Okay. You said K-Bid affiliate. What does that
- 24 mean?
- 25 **A. It means that I go to places and sell their**

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1 **stuff for them on line.**
 2 Q. Okay. Is that kind of like E-Bay?
 3 A. Kind of.
 4 Q. Okay.
 5 A. But it's an auction.
 6 Q. Okay. And that's all on line?
 7 A. Yes.
 8 Q. Okay. So just with regards to the two
 9 properties, is there any other business that is
 10 conducted on the properties?
 11 A. No.
 12 Q. Okay. And you mentioned that you reside on the
 13 235th parcel. Have you resided on it for all 14
 14 years?
 15 A. Yes.
 16 Q. Okay.
 17 A. Yes. Well, probably 13. It took me a year to
 18 build the house.
 19 Q. Okay. So you built the new house on the
 20 property?
 21 A. Yes.
 22 Q. Okay. And would that be -- do you know what
 23 year that would be that you actually moved onto
 24 the property?
 25 A. No.

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1 **animals followed.**
 2 Q. Okay. And when you say "all the other animals",
 3 can you generally tell me what animals? Was it
 4 all of the ones you listed earlier?
 5 A. Probably not all of them. There were wolves,
 6 raccoons, fox. I'm trying to think way back
 7 then. Bobcats, porcupines and goats.
 8 Q. Where did you move the animals from?
 9 A. The 24005.
 10 Q. Okay. So they were on Dodd and then you moved
 11 them to 235th Street?
 12 A. Yes.
 13 Q. Okay. Do you recall when you had -- when you
 14 first had those animals on the Dodd property?
 15 A. The first wolf I got was in 1992.
 16 Q. Okay. And on the Dodd property, did you always
 17 reside on that when you owned it until you moved
 18 to 235th?
 19 A. Right.
 20 Q. Okay. What structures are on the 235th Street
 21 parcel?
 22 A. There is a house, what we call a cat shed, a fox
 23 shed and the main barn.
 24 Q. Okay. And is the main barn your -- the new
 25 building?

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1 Q. Okay. When did you move any of the animals onto
 2 the property?
 3 A. Actually the barn was there before I was.
 4 Q. Okay.
 5 A. I built the barn first.
 6 Q. Okay. So you built the barn before you built
 7 your house?
 8 A. Yes.
 9 Q. Okay. And what animals did you then move onto
 10 the -- into that barn?
 11 A. That at that time was Black Angus and horses at
 12 that time.
 13 Q. Okay. What did you -- when you first built the
 14 barn and purchased the property, what did you do
 15 on the property?
 16 A. Raised horses and cattle.
 17 Q. Okay.
 18 A. Sorry. It's Black and Red Angus.
 19 Q. Okay. How long did you do that before you -- I
 20 guess when was the next animal or what was the
 21 next animal that you brought onto the property?
 22 A. Well, there is -- I had to wait until I moved
 23 there.
 24 Q. Okay.
 25 A. So as soon as I moved there, then all the other

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1 A. Yes.
 2 Q. Okay. And then what structures are on the Dodd
 3 property?
 4 A. There is a house, a garage, a Quonset, a dog
 5 kennel.
 6 Q. I'm sorry. What did you say before dog kennel?
 7 A. A Quonset.
 8 Q. What is a Quonset?
 9 A. It's like a metal dome storage building.
 10 Q. Okay. And were you finished or did I cut you
 11 off?
 12 A. No. And then there is an indoor riding arena
 13 and eight box stalls.
 14 Q. Eight box stalls you said?
 15 A. Yes.
 16 Q. And what are the box stalls for?
 17 A. Pigs.
 18 Q. Okay.
 19 A. Supposed to be for horses but I have pigs in
 20 them right now.
 21 Q. Okay. So on the 235th Street property, do you
 22 board any horses on that property?
 23 A. I have two.
 24 Q. Two. Okay. Are those your personal horses or
 25 are you boarding them for somebody?

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1 **A. Those are boarding.**
 2 **Q.** Okay.
 3 **A. That's what you asked; isn't it?**
 4 **Q.** Yes. And where -- which structure would they be
 5 kept in?
 6 **A. They are not kept in a structure.**
 7 **Q.** Okay.
 8 **A. Those are border horses, not mine.**
 9 **Q.** Okay. And then do you board any of the horses
 10 on the Dodd property?
 11 **A. There is usually two.**
 12 **Q.** Two on that property as well?
 13 **A. Uh-huh.**
 14 **Q.** Okay.
 15 **A. And I have CUP's for that.**
 16 **Q.** How many horses do you personally have?
 17 **A. Twelve.**
 18 **Q.** Okay. And are they all outside or do you keep
 19 them in any structure?
 20 **A. They are outside.**
 21 **Q.** Okay. And with regards to the structures on
 22 235th Street, were those -- now you already said
 23 you built the house there. And we know that you
 24 built the barn there. The cat shed and the fox
 25 shed, were those also buildings that you built on
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1 **Q.** A portable? Okay. How is it moved?
 2 **A. Truck, trailer.**
 3 **Q.** Okay.
 4 **A. That was how we got it there.**
 5 **Q.** So it used to be a chapel. What do you use it
 6 for now?
 7 **A. To sell fur out of.**
 8 **Q.** Okay. And how long has that been on the
 9 property?
 10 **A. Almost two years. It was moved on the property**
 11 **almost two years ago. Where it's sitting now,**
 12 **it's only been there almost a year or a little**
 13 **over a year.**
 14 **Q.** Okay. Is there --
 15 **A. It was moved and then it was moved again because**
 16 **it was just set in a temporary position for a**
 17 **month.**
 18 **Q.** How do you determine where it will be moved? Is
 19 it just a matter of personal preference?
 20 **A. I guess.**
 21 **Q.** Okay. And you mentioned selling fur out of
 22 that. Is that something let's say somebody can
 23 drive up anytime to go purchase fur, or is there
 24 set hours, or how could somebody go and arrange
 25 for that?
 KINSELLA, HARTIGAN & KELZER, INC.

1 the property?
 2 **A. Yes.**
 3 **Q.** Okay. And then similarly for the Dodd property,
 4 were all the structures built on the property?
 5 **A. Yes.**
 6 **Q.** Okay.
 7 **A. Well, they were already built. I didn't build**
 8 **them.**
 9 **Q.** They were just already there when you --
 10 **A. On Dodd.**
 11 **Q.** -- purchased it?
 12 **A. Right.**
 13 **Q.** Okay. And then actually for the 235th Street,
 14 the cat shed and the fox shed, were those already
 15 on the property?
 16 **A. No. I built them.**
 17 **Q.** You built those. Okay. And did you -- do you
 18 have like a chapel on the -- or used to be a
 19 chapel that's also on the property?
 20 **A. It used to be a chapel.**
 21 **Q.** Okay. Is that a structure that's on the
 22 property?
 23 **A. Yes.**
 24 **Q.** Okay.
 25 **A. It's a portable one.**
 KINSELLA, HARTIGAN & KELZER, INC.

1 **A. It depends. Since there is nobody allowed in**
 2 **the barn and since I've got to sell my fur**
 3 **sometime, it depends on if we're there on**
 4 **weekends, my gate is usually closed, then, you**
 5 **know, we're working around there. But like**
 6 **yesterday I had a fur buyer come in and that's**
 7 **the only place to keep them warm.**
 8 **Q.** Okay.
 9 **A. And so we go in there and we talk about**
 10 **transactions and do paperwork and all that kind**
 11 **of stuff.**
 12 **Q.** Do they have to set up an appointment with you
 13 ahead of time?
 14 **A. A lot of times.**
 15 **Q.** Okay. And so sometimes can somebody just come
 16 to buy it?
 17 **A. If my gates are open, yes.**
 18 **Q.** Okay. Can anybody buy the fur or do you have to
 19 have a certain qualification to buy the fur from
 20 you?
 21 **A. If depends on if it's raw.**
 22 **Q.** Okay. And just, you know, I don't understand
 23 all of the terminology. So is that nothing has
 24 been treated with the fur or --
 25 **A. Right.**
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1 Q. So you literally might see blood on it; is that
 2 what you mean?
 3 A. Right.
 4 Q. Okay. And is there a terminology for it not
 5 being raw?
 6 A. Tanned.
 7 Q. Tanned. So does that mean anybody could touch
 8 it and grab it?
 9 A. Right.
 10 Q. Okay. So, can anybody purchase the tanned fur?
 11 A. Right.
 12 Q. Okay. And if it's raw, who has -- what do you
 13 have to have to be able to purchase the raw fur?
 14 A. It all depends on what your qualifications are.
 15 Sometimes you just need my DNR number. Sometimes
 16 you have to have your raw fur buyer license. It
 17 all depends on what your status is. And it
 18 depends on, you know, usually you would take my
 19 DNR paperwork with you, especially in order to
 20 get Cities tags. C-i-t-i-e-s. That's from the
 21 U.S. Fish and Wildlife.
 22 Q. Okay. What does that tag mean?
 23 A. Then you can bring it across borders, bring it
 24 into Canada.
 25 Q. Okay.

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1 Q. Okay.
 2 A. Rule number one, wild wolves are from 70 to 90
 3 pounds. My wolves, the females are 90 pounds.
 4 The males are 130. You work for years to get
 5 those blood lines. That is the difference
 6 between making them -- keep them two years or
 7 being able to pelt them for one year. The
 8 yearlings -- our yearlings are bigger than the
 9 ones in the wild. So, you breed for size.
 10 Q. Okay.
 11 A. You breed for blood lines. You breed for fur
 12 quality. It takes years to get to that.
 13 Q. Are they more valuable when they are bigger?
 14 A. Bigger.
 15 Q. Okay. I suppose you get more fur that way?
 16 A. It's not necessarily -- they go by foot.
 17 Q. Okay.
 18 A. So some people measure them from nose to tip of
 19 tail. Some people measure them from nose to
 20 beginning of the tail. If you measure from the
 21 nose to the beginning of the tail, the six
 22 footers and above are the most valuable. You
 23 almost get double in price.
 24 Q. Okay. And maybe if we kind of break it down.
 25 Say from 1992 you had one wolf. Do you have an

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1 A. Or you can ship it federal, like to Model
 2 Tannery, called Model Mink. And so you need your
 3 Cities permits in order to ship it, because
 4 that's federal.
 5 Q. Okay. Earlier you said that you got your first
 6 wolf in 1992?
 7 A. Uh-huh.
 8 Q. And do you know how many wolves you have today?
 9 A. I think I have 52.
 10 Q. Okay.
 11 A. Sorry. 49.
 12 Q. Oh, sure.
 13 A. Oops.
 14 Q. No problem. So, that is about 20 years, if I'm
 15 doing my math right. Do you have kind of an idea
 16 of how much the wolves would increase each year,
 17 in I guess very generally?
 18 A. Can you rephrase that?
 19 Q. Sure.
 20 A. You mean how much the pelts are worth, how many
 21 animals I have?
 22 Q. And I guess maybe a better way would be is: You
 23 went from 1 to 49. Did you go that way from
 24 breeding them or did you purchase the wolves?
 25 A. Some of them -- it depends on the blood lines.

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1 idea of approximately how many wolves you may
 2 have had in 2002? So ten years later?
 3 A. I can't remember that far.
 4 Q. Okay. That's fine. Maybe if we say -- so 2012,
 5 today, you've got about 49 wolves. Say five
 6 years ago, do you have an idea of how many wolves
 7 you might have had approximately?
 8 A. Probably 15.
 9 Q. Okay.
 10 A. Approximately.
 11 Q. Sure.
 12 A. And it depends on time of year. It depends on
 13 breeding season. It depends on -- you know,
 14 everything changes rapidly.
 15 Q. Okay. So, could the number suddenly spike
 16 because you now have the new wolves?
 17 A. It could spike because of the baby season.
 18 Q. And then it could drop again if you pelted
 19 several of the wolves?
 20 A. Or if I sell them live or, you know, like
 21 between December 15th and January 15th I could
 22 drop in half.
 23 Q. Okay.
 24 A. In May I could quadruple.
 25 Q. Sure.

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1 **A. It depends. Last year, since the wolves were**
 2 **outside and you don't have to artificially**
 3 **inseminate them like you do the fox and that kind**
 4 **of stuff, the last year we could still live**
 5 **breed. I had four litters. I had a nine, an**
 6 **eight, an eight and an eight, which was amazing.**
 7 **They usually have anywhere between two and four.**
 8 **Last year we had huge litters because we probably**
 9 **figured out the proper nutrition and everything**
 10 **else and, you know, it all depends.**

11 **Q.** Okay. Maybe something that will help us kind of
 12 talk about some other animals, I have an Exhibit
 13 here that we'll get marked.

14 (Whereupon, PETER Exhibit
 15 Number 1 was marked for
 16 identification by the court
 17 reporter.)

18 BY MS. ANGOLKAR:

19 **Q.** I'm showing you what has been marked as Exhibit
 20 1. First I'm just wondering if you recognize
 21 this document?

22 **A. Uh-huh.**

23 **Q.** And how do you recognize it?

24 **A. Because I made it.**

25 **Q.** Okay. Can you tell me why you made this?

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1 fox on either of the properties? So the first
 2 time you obtained fox?

3 **A. No, not the year.**

4 **Q.** Okay.

5 **A. Probably 2005, 2004, 2003.**

6 **Q.** Maybe a way to help, too, would be to even think
 7 of which property you were on at the time. So is
 8 the first time that you got the fox was when you
 9 were on the 235th Street parcel?

10 **A. I think I was living there, but I had them down**
 11 **on Dodd in the barn.**

12 **Q.** Okay. And then how about -- I'm just going to
 13 kind of run through the list so you can kind of
 14 see where I'm going. When is the first time that
 15 you obtained raccoon?

16 **A. '04. 0 something. I don't know the years on**
 17 **all these.**

18 **Q.** Okay.

19 **A. That would be impossible for me to know.**

20 **Q.** That's fine. If we hit one and you don't really
 21 know, just let me know. I'm still going to run
 22 through the list just so see if maybe you do
 23 remember for some of them. So how about Links?
 24 Do you remember when you got your first Links?

25 **A. I've had all these for years, except for**

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1 **A. Because the Township asked for a rough estimate**
 2 **of how many animals I had at that time.**

3 **Q.** Okay. And we see at the top there it says:
 4 "Received Eureka Township May 12th", and looks
 5 like somebody wrote "2008". Does that help you
 6 recall when you would have made the document?

7 **A. No. Because if I recall, it should have been**
 8 **2006.**

9 **Q.** Okay. So you believe that you had made this
 10 document in 2006?

11 **A. It was a long time ago.**

12 **Q.** Okay. Do you believe it was 2006 that you made
 13 it?

14 **A. Because we went through something about me**
 15 **having, quote, unquote, what the Township called**
 16 **exotic animals, which I don't call them exotic,**
 17 **nor does the federal government. But that**
 18 **happened in 2006, if I remember correct. But**
 19 **like I said, it was years ago.**

20 **Q.** Okay. And I'm just wondering: Do you know for
 21 certain if you made this document in 2006?

22 **A. I don't know for certain.**

23 **Q.** Okay. And so does this kind of help us with a
 24 frame of reference? We talked about wolves
 25 already. Do you recall when you first obtained

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1 **wolverine we don't have anymore.**

2 **Q.** Okay. And so with regard to Links, do you
 3 remember the first time you got a Links?

4 **A. No.**

5 **Q.** Okay. How about Bobcat, do you remember the
 6 first time you got a Bobcat?

7 **A. No.**

8 **Q.** Okay.

9 **A. Like I said, it was so many years ago, I**
 10 **don't -- I don't remember dates.**

11 **Q.** Okay. Is there anything that would help you
 12 recall when you did obtain each of the animals?

13 **A. Probably not.**

14 **Q.** Okay. Do you have to report -- when you own one
 15 of these animals, do you have to report it to any
 16 agency?

17 **A. Well, I've had my DNR license since 2005.**

18 **Q.** Okay.

19 **A. So I've had most of these from before then.**

20 **Q.** Okay. So, you mentioned the DNR. Is that an
 21 agency that you would have to list some of the
 22 animals with or report the animals to?

23 **A. One of them, yes.**

24 **Q.** Okay. Any other agencies?

25 **A. The USDA.**

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- 1 Q. Okay.
- 2 **A. And the Minnesota Department of Ag.**
- 3 Q. And so why do you have to report any of the
- 4 animals to DNR?
- 5 **A. Because they are on my permit.**
- 6 Q. Or I guess maybe a better way to ask that is:
- 7 What does the DNR regulate for you?
- 8 **A. It regulates what I own, how I own.**
- 9 Q. Okay.
- 10 **A. They come out and do inspections.**
- 11 Q. Okay. And then how about what does the USDA
- 12 regulate for you?
- 13 **A. Same thing.**
- 14 Q. Okay.
- 15 **A. But they only regulate the animals that are on**
- 16 **my agri-tours and the ones that I bring out for**
- 17 **WWW in public. They don't regulate all my**
- 18 **animals.**
- 19 Q. What does the Minnesota Department of
- 20 Agriculture regulate?
- 21 **A. Everything that I farm.**
- 22 Q. Does that include the -- so the fur farming?
- 23 **A. Yes. And the hogs.**
- 24 Q. Okay.
- 25 **A. And the goats.**

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- 1 Q. Okay. And looking at the list of animals on
- 2 Exhibit 1, as you look at the list do you see any
- 3 of them that you can remember when you obtained
- 4 them.
- 5 **A. Like I said, my first wolf was in '92.**
- 6 Q. Uh-huh. Okay. Any other that you can recall?
- 7 **A. I think my first raccoon was in '01. And so it**
- 8 **would have probably been '02 with some of the**
- 9 **fox. And the other ones I couldn't tell you.**
- 10 Q. Okay.
- 11 **A. But they were all before 2005 except for the**
- 12 **wolverine.**
- 13 Q. So was 2005 the first time that you had to --
- 14 **A. Get a license.**
- 15 Q. Okay. How did you -- how did that come about or
- 16 how did you learn you had to do the license?
- 17 **A. We just started checking around.**
- 18 Q. Okay. So that was something you looked into or
- 19 did the DNR come to you?
- 20 **A. I looked into it.**
- 21 Q. Okay. How about the USDA, when did you start
- 22 reporting to them?
- 23 **A. I don't remember exactly. I think that was '06.**
- 24 Q. In looking at the bottom of Exhibit 1, it talks
- 25 about the fluctuations depending on breeding and

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- 1 pelting. And you I think mentioned that earlier
- 2 just sitting here today. Does that apply to all
- 3 of the animals on this list?
- 4 **A. Yes.**
- 5 Q. Okay.
- 6 **A. Except for the wolverine because I don't have**
- 7 **those anymore.**
- 8 Q. Sure. Excluding the wolverine. And aside from
- 9 the wolverine, looking at this list, are these
- 10 animals that you personally own today?
- 11 **A. I don't have any coyotes.**
- 12 Q. Okay. Would you acquire coyotes in the future,
- 13 or is that an animal that you are going to keep
- 14 off the list?
- 15 **A. I would like to because the fur prices went up;**
- 16 **but they are really high strung and they are very**
- 17 **hard to breed.**
- 18 Q. Okay.
- 19 **A. So if I can figure it out, I will get them back.**
- 20 **I just haven't figured out the correct breeding**
- 21 **for them yet.**
- 22 Q. Okay. If you were going to get the coyote or
- 23 maybe say any of the animals, how do you acquire
- 24 them?
- 25 **A. You have to go either, depending on what you are**

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- 1 **going to use them for, it depends on if you need**
- 2 **to buy them from a USDA or a DNR licensed**
- 3 **facility.**
- 4 Q. Okay. And excuse my ignorance on the subject,
- 5 but does somebody always, that does what you do,
- 6 do they have to go and purchase them from
- 7 somebody or can you trap any of them?
- 8 **A. You can't take anything out of the wild.**
- 9 Q. Okay. In looking at the list of animals, do
- 10 you -- first, do you keep an inventory of the
- 11 animals that you have?
- 12 **A. Yes.**
- 13 Q. Okay. And how frequently do you check the
- 14 numbers of the animals you have?
- 15 **A. It depends on the season.**
- 16 Q. Okay. And when you say season, do you mean
- 17 pelting season or breeding season or both?
- 18 **A. Both.**
- 19 Q. So how many times a year might you take
- 20 inventory?
- 21 **A. That fluctuates. It depends on if I sell**
- 22 **something or something gets killed or something**
- 23 **dies or if something is bread or if we pelt**
- 24 **something.**
- 25 Q. Okay. Is it a situation where you wait until

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1 some event happens, like we're going to -- we
 2 just bread some animals and so now we take a
 3 count?
 4 **A. As soon as they have their litters.**
 5 **Q.** Okay.
 6 **A. Then we change inventory.**
 7 **Q.** And then similarly, say that you've pelted
 8 several animals, would you then also do another
 9 inventory?
 10 **A. Yes.**
 11 **Q.** Okay. Who actually then does the inventory or
 12 count?
 13 **A. There is one of the three of us.**
 14 **Q.** Okay. And when you say the three of you --
 15 **A. Either Danny, Adam or I.**
 16 **Q.** Okay.
 17 **A. And that depends on for which license.**
 18 **Q.** And when you say "which license", are you
 19 talking about the DNR, USDA and Department of Ag?
 20 **A. Yes.**
 21 **Q.** Okay. Do those agencies require you to report
 22 the number right after one of those events?
 23 **A. No.**
 24 **Q.** Okay. And how do you physically keep the
 25 records? Like is it on a computer or in a

KINSELLA, HARTIGAN & KELZER, INC.

1 **A. Monday.**
 2 **Q.** Okay. And if you just pelted a couple of wolves
 3 last night, and might do some more today, would
 4 you do inventory again this week or --
 5 **A. It depends on if my guy comes up from Indiana,**
 6 **because then he'll take all the wolves. So then**
 7 **I'll just wait until he comes up so I don't have**
 8 **to redo them every time.**
 9 **Q.** Sure. And then do you keep your inventory
 10 record then on your property?
 11 **A. Yes.**
 12 **Q.** Do you have like a physical office that you use
 13 for your businesses?
 14 **A. Kind of.**
 15 **Q.** Okay. And I suppose in some way your office is
 16 outside, but where would you actually keep any of
 17 your paper records?
 18 **A. It's inside the barn on the second floor.**
 19 **Q.** Okay. And since you just did inventory on
 20 Monday, so you remembered that right now you have
 21 about 49 wolves. Do you remember off the top of
 22 your head how many of the other --
 23 **A. I didn't do the inventory. Adam did.**
 24 **Q.** Oh, okay. And did you look at the inventory
 25 after he did it?

KINSELLA, HARTIGAN & KELZER, INC.

1 notebook?
 2 **A. You have inventory sheets.**
 3 **Q.** Okay.
 4 **A. So you just write them down with a pen and piece**
 5 **of paper. And the USDA has certain sheets. The**
 6 **DNR you've got to fill out their certain sheet**
 7 **once a year. So does the Minnesota Department of**
 8 **Ag. So there is -- that's one of the things on**
 9 **your questions, your discovery questions, how you**
 10 **take it? You take it with a pencil and a piece**
 11 **of paper and you just count.**
 12 **Q.** Okay. And then do you retain the inventory
 13 sheets that you've prepared, or do you have like
 14 a retention schedule of how long you keep them?
 15 **A. We keep them until the inventory changes again.**
 16 **I don't get what you are saying.**
 17 **Q.** And what I mean to say, say for example you did
 18 an inventory two months ago, and then say today
 19 you do inventory again, would you still keep that
 20 sheet from two months ago?
 21 **A. No.**
 22 **Q.** So you only keep the current inventory sheet?
 23 **A. Right.**
 24 **Q.** Okay. Now, do you recall the last time that you
 25 did an inventory?

KINSELLA, HARTIGAN & KELZER, INC.

1 **A. No.**
 2 **Q.** Okay.
 3 **A. He's a biologist. I figure he can do that**
 4 **himself.**
 5 **Q.** Okay. Overall, do you -- I know that you said
 6 that the numbers fluctuate depending on breeding
 7 and pelting. Do you have an opinion or
 8 understanding of whether your overall populations
 9 of the animals grows each year?
 10 **A. It has, yes.**
 11 **Q.** Okay.
 12 **A. Except for the last year it didn't grow very**
 13 **much, except for the wolves.**
 14 **Q.** Okay.
 15 **A. Again, when you don't have a barn to breed in,**
 16 **you would -- you don't -- your population doesn't**
 17 **increase very much.**
 18 **Q.** And let's talk about that a little bit. Now the
 19 new barn was built because the old barn was
 20 burned in a fire; correct?
 21 **A. Correct.**
 22 **Q.** And that was -- when was that?
 23 **A. November 15th of 2010.**
 24 **Q.** Okay. And the old barn, what did you use that
 25 for?

KINSELLA, HARTIGAN & KELZER, INC.

1 **A. Artificial insemination. I had a couple horse**
 2 **stalls in there. I had my office in there. I**
 3 **had a freeze dryer. I had three walk-in**
 4 **freezers. So it was pelt handling. And I don't**
 5 **know if I said skinning or not.**
 6 **Q.** Okay. And so after that fire -- well, first,
 7 did you have any of the animals living in that
 8 barn, the old barn?
 9 **A. I had prairie dogs.**
 10 **Q.** Okay. After that barn fire, what did you use
 11 for skinning, what structure?
 12 **A. We didn't.**
 13 **Q.** Okay. So, for the winter of 2010 and early
 14 2011, you did not do any skinning?
 15 **A. No.**
 16 **Q.** Okay.
 17 **A. Because I'm not skinning in my house. And last**
 18 **year the township wouldn't let me in my barn.**
 19 **Q.** Okay. And how about after the barn fire, did
 20 you do the artificial insemination anywhere else
 21 that winter?
 22 **A. No. I don't know about you, but I probably**
 23 **wouldn't want fox semen in your house, just like**
 24 **I don't want it in mine.**
 25 **Q.** Fair enough. And how about -- the same thing
 KINSELLA, HARTIGAN & KELZER, INC.

1 with pelt handling. Did you do that anywhere
 2 else that season of 2010 early 2011?
 3 **A. 2010 I didn't. 2011 I sold whole carcasses to**
 4 **taxidermy people, as much as I could. Which then**
 5 **you also lose money because then they have to**
 6 **pelt them, because you don't skin them. So you**
 7 **lose money because they have to do all the work.**
 8 **Q.** Okay. And then with regards to the prairie
 9 dogs, did you move them somewhere then after the
 10 barn fire?
 11 **A. I moved them into the house.**
 12 **Q.** Okay.
 13 **A. And it was early winter. So the animals that**
 14 **usually go in the barn, weren't in there yet. So**
 15 **then that winter everything came into the house,**
 16 **or the other barn on Dodd. Which then also made**
 17 **me not be able to board as many horses as I used**
 18 **to.**
 19 **Q.** Okay.
 20 **A. Because I had things like porcupines and geese**
 21 **and possums and woodchucks in my horse stalls.**
 22 **Q.** Okay. So if the fire was November 2010, when
 23 you mentioned the other animals going inside
 24 later, like what time of the winter would that
 25 be?
 KINSELLA, HARTIGAN & KELZER, INC.

1 **A. They usually go in right around December 1st.**
 2 **Q.** Okay.
 3 **A. It's usually not cold until December, January,**
 4 **February.**
 5 **Q.** So like December of 2010 is when they would have
 6 moved into the other --
 7 **A. Yes.**
 8 **Q.** -- spaces? Okay.
 9 **A. The other thing, I don't know if you know**
 10 **anything about fox, but fox urine smells like**
 11 **skunk. And you know when you asked why didn't I**
 12 **artificially inseminate in my house, imagine**
 13 **letting a skunk go in your house and spraying**
 14 **your house.**
 15 **Q.** Okay.
 16 **A. And semen has to be heated and has to be kept**
 17 **warm or the tails break. And you have to use**
 18 **extender and have to keep it warm. And if I**
 19 **was -- anybody in the world wouldn't want to let**
 20 **a skunk go in their house. And that's what fox**
 21 **urine smells like. And when fox urine -- or fox**
 22 **get excited or get mad or start to get bred, they**
 23 **urinate. And that is something nobody wants in**
 24 **their house.**
 25 **Q.** Okay. Now, with regards to the new barn, when
 KINSELLA, HARTIGAN & KELZER, INC.

1 did you start constructing that?
 2 **A. August.**
 3 **Q.** Okay.
 4 **A. 2011.**
 5 **Q.** Okay. And at some point a stop work order was
 6 issued on that; correct?
 7 **A. Uh-huh.**
 8 **Q.** Okay. Now when the stop work order was issued,
 9 were you still living on the property, on the
 10 parcel, so in your house?
 11 **A. I've never stopped living on the property.**
 12 **Q.** Okay. And when the stop work order was issued,
 13 did you still have your animals outside on the --
 14 **A. No. I had my animals in the barn already.**
 15 **Q.** Okay. Were you able -- in the new barn?
 16 **A. Yes.**
 17 **Q.** Okay. Were they -- so while the stop work order
 18 was in effect, were you still able to have
 19 animals in there?
 20 **A. No.**
 21 **Q.** Okay.
 22 **A. I had to move them all.**
 23 **Q.** Okay. And where did you move then?
 24 **A. We had to move them into the house or into the**
 25 **other barn.**
 KINSELLA, HARTIGAN & KELZER, INC.

1 Q. Okay.

2 **A. On the other property.**

3 Q. And now were you still able to take care of the

4 animals? Understanding you're --

5 **A. Well, you have to take care of your animals.**

6 **But between not having the right facilities and**

7 **not having certain ones in heat, so having to put**

8 **them in your house and not being able to wash the**

9 **barrels or sort meat in heat or do any of that**

10 **stuff, it was horrible.**

11 Q. Okay.

12 **A. Because try sorting 2500 pounds of meat every**

13 **other day in the freezing cold temperatures. And**

14 **then try to wash greasy barrels that you have to**

15 **bring back to Sam's Club in freezing cold**

16 **temperatures and get the meat out of the barrels**

17 **because you have no place warm to wash them**

18 **anymore. So then you have to bring them into**

19 **your house inside your bathtub where you take a**

20 **bath with greasy barrels and or grease all over**

21 **your bathtub.**

22 Q. Okay. Now, before you started building the

23 barn, where did you prepare the meat?

24 **A. It was warm.**

25 Q. Okay. How about that previous winter? So after

KINSELLA, HARTIGAN & KELZER, INC.

1 the barn fire in November?

2 **A. We actually did it at my mother's house over in**

3 **Farmington. But she moved since then. So that**

4 **heated garage was not available for us.**

5 Q. Okay.

6 **A. She moved to a townhome because she had three**

7 **strokes.**

8 Q. Okay. Now, earlier we kind of touched a little

9 bit on some of what WWW does and sometimes

10 holding events on the property. Does Fur-Ever

11 Wild host any events on the property that are

12 open to the public?

13 **A. Which Fur-Ever Wild?**

14 Q. Fur-Ever Wild, first the sole proprietorship?

15 **A. I would -- it's kind of a trick question,**

16 **because I own Fur-Ever Wild and I hold -- I'm**

17 **open to the public on the weekends.**

18 Q. Okay. Maybe the better way to ask it is: Who,

19 meaning which people or entities, host events

20 that are open to the public?

21 **A. I do.**

22 Q. Okay. So you personally?

23 **A. Yes.**

24 Q. Okay.

25 **A. But Fur-Ever Wild is the same thing. That's me,**

KINSELLA, HARTIGAN & KELZER, INC.

1 **because it's a sole proprietorship. Am I**

2 **confused?**

3 Q. And so --

4 **A. Am I confused?**

5 Q. So basically that's kind of interchangeable then.

6 So if we say Fur-Ever Wild the sole

7 proprietorship is hosting or Teresa Petter is

8 hosting, it's really the same thing? Is that --

9 **A. Right.**

10 Q. Okay. Just so that we're on the same page.

11 Okay. Let's get this marked as an Exhibit. I'm

12 going to ask you some questions about some of the

13 events.

14 (Whereupon, PETER Exhibit

15 Number 2 was marked for

16 identification by the court

17 reporter.)

18 BY MS. ANGOLKAR:

19 Q. I'm showing you what's been marked as Exhibit 2.

20 First, do you recognize this document?

21 **A. Yes.**

22 Q. Okay. And what is this?

23 **A. It's an ad that I did. I believe this one came**

24 **out around the Dakota County Fair time.**

25 Q. Okay. And what month would that be?

KINSELLA, HARTIGAN & KELZER, INC.

1 **A. August.**

2 Q. Okay. Of this year?

3 **A. Yes.**

4 Q. Okay. And so we see -- I'm looking kind of more

5 at the middle where there is a Howl-O-Ween Haunt,

6 and then also we see a Winter Wonderland. If I

7 came to the property for the Howl-O-Ween Haunt,

8 what kind of things would I encounter? Like what

9 happens at that event?

10 **A. We just dressed the ranch up in Halloween, and**

11 **then we give you a tour and teach you about fur**

12 **bearing animals and agricultural animals.**

13 Q. Okay. And how much is -- how much -- actually I

14 think I have an Exhibit here. So maybe we'll get

15 this marked.

16 (Whereupon, PETER Exhibit

17 Number 3 was marked for

18 identification by the court

19 reporter.)

20 BY MS. ANGOLKAR:

21 Q. Okay. I'm showing you Exhibit 3 as well, and

22 I'll kind of hold that to the side for you so

23 that you can see Exhibit 2 at the same time.

24 First with Exhibit 3, do you -- this is a

25 printout from the Internet. So it might look a

KINSELLA, HARTIGAN & KELZER, INC.

1 little bit different, but do you recognize the
 2 website that that would be printed from?
 3 **A. Yes.**
 4 **Q.** And is that a website that you maintain?
 5 **A. Yes.**
 6 **Q.** Okay. And we see Fur-Ever Wild. I see it at
 7 the top, and then actually at the bottom I see a
 8 web address. Do you see that as well?
 9 **A. This one? (Indicating.)**
 10 **Q.** Yes.
 11 **A. Yes.**
 12 **Q.** On the bottom. Okay. And so I was going to ask
 13 you about admission. Is this, what we see kind
 14 of in the middle of the page where it says: Kids
 15 admission, \$10, adult \$7.50, is that correct for
 16 the admission cost?
 17 **A. We dropped it; but yes, that's what I had on the**
 18 **Internet.**
 19 **Q.** Okay. When you say "dropped it", you mean that
 20 you lowered the cost?
 21 **A. Yes.**
 22 **Q.** Okay. What did it get lowered to?
 23 **A. \$5 for kids.**
 24 **Q.** Okay. And then where it says -- further down it
 25 says: Extend hours, Friday 4:00 to 9:00;
 KINSELLA, HARTIGAN & KELZER, INC.

1 Saturday 12:00 to 9:00; Sunday 12:00 to 6:00, was
 2 there -- is that this extended from what we see
 3 in larger print above the wolf eyes of the
 4 typical hours?
 5 **A. Yes.**
 6 **Q.** Okay. So, first just looking at the typical
 7 hours, is that something that's year round?
 8 **A. Yes.**
 9 **Q.** Okay. And then so these, the extended hours,
 10 was that just for the Howl-O-Ween Haunt?
 11 **A. Yes.**
 12 **Q.** Okay. If they -- if somebody came and took the
 13 tour, would they be able to see like the wolves
 14 if they wanted to?
 15 **A. Yes.**
 16 **Q.** Okay. And then if we look at -- we'll look at
 17 Exhibit 2, but I'm also going to have another
 18 Exhibit marked.
 19 (Whereupon, PETER Exhibit
 20 Number 4 was marked for
 21 identification by the court
 22 reporter.)
 23 BY MS. ANGOLKAR:
 24 **Q.** Okay. Looking at Exhibit 4, first, this again
 25 is a printout from the Internet, so it might look
 KINSELLA, HARTIGAN & KELZER, INC.

1 a little bit different. But do you --
 2 **A. You printed it out yesterday?**
 3 **Q.** Yes.
 4 **A. You did your homework.**
 5 **Q.** I did. Do you recognize what website that's
 6 from?
 7 **A. Yes.**
 8 **Q.** And if so, is that from your website as well?
 9 **A. Yes.**
 10 **Q.** Okay. And so I wanted to then ask you about the
 11 Winter Wonderland. What would somebody encounter
 12 if they come to that event?
 13 **A. You see the fur bearing animals and agricultural**
 14 **animals; but at the same time you just see**
 15 **Christmas lights. We just decorated the farm in**
 16 **Christmas lights.**
 17 **Q.** Okay. And then looking at kind of the middle of
 18 the page, it gives you hours and also says that
 19 when you are closed for Christmas. And are those
 20 extend hours as well?
 21 **A. Yes.**
 22 **Q.** Okay. And so similarly when you say fur bearing
 23 animals, that can be, you know, I could go and
 24 see the lights and see the wolves that you have
 25 on display?
 KINSELLA, HARTIGAN & KELZER, INC.

1 **A. Yes.**
 2 **Q.** Okay.
 3 (Whereupon, PETER Exhibit
 4 Number 5 was marked for
 5 identification by the court
 6 reporter.)
 7 BY MS. ANGOLKAR:
 8 **Q.** I'm showing you Exhibit 5, and this is also a
 9 printout from the Internet. Do you recognize
 10 that from your website?
 11 **A. Yes.**
 12 **Q.** And looking more towards the left, admission
 13 \$7.50, is that what you were charging for
 14 admission for that event?
 15 **A. \$7.50 for adults, \$5 for kids and military is**
 16 **always free.**
 17 **Q.** Okay. And I see that there is a mention about
 18 the Cougar cubs. So do you have Cougars on the
 19 property as well?
 20 **A. Yes.**
 21 **Q.** Do you know how many Cougars you have?
 22 **A. Six.**
 23 **Q.** Okay. When did you first get Cougars on the
 24 property?
 25 **A. Jake is eight.**
 KINSELLA, HARTIGAN & KELZER, INC.

1 Q. Is Jake one of the Cougars?
 2 **A. Jake is our big male. He's our breeder. He's**
 3 **not on the Exhibit because he's a Breeder.**
 4 Q. Have you had him since he was a cub?
 5 **A. Yes.**
 6 Q. On the property?
 7 **A. Yes.**
 8 Q. Okay. So he would be your first Cougar?
 9 **A. Yes. In fact, if you don't have the right**
 10 **Exhibit -- it doesn't show him.**
 11 Q. Is there -- I didn't print out all the page from
 12 your website. Is there something on your website
 13 that refers to Jake?
 14 **A. Yes.**
 15 Q. Are you thinking of like a photograph or
 16 something?
 17 **A. Yes.**
 18 Q. Okay. So somebody could go on your website to
 19 see his pictures?
 20 **A. Yes.**
 21 Q. Okay. And is this -- so the Winter Wonderland,
 22 is that something that's still going on?
 23 **A. Yes.**
 24 Q. Okay.
 25 **A. Kind of like when the apple orchard gives their**
 KINSELLA, HARTIGAN & KELZER, INC.

1 product?
 2 **A. We do sell a lot of tails, fox faces, rabbit**
 3 **pelts, if you want to call it that. We do**
 4 **sell -- I have some T-shirts if you want to buy**
 5 **those, or we do sometimes do some statues.**
 6 Q. Okay. And like if I'm at the Howl-O-Ween Haunt,
 7 where do I go to buy a T-shirt?
 8 **A. I have a little portable building that is an**
 9 **eight by ten that you can go into.**
 10 Q. And is that the --
 11 **A. No.**
 12 Q. -- building we talked about earlier?
 13 **A. No.**
 14 Q. So it's not the old chapel?
 15 **A. It's not the trappers cabin. No. This is**
 16 **called a trading post.**
 17 Q. Okay.
 18 **A. It's under the legal limit of needing a building**
 19 **permit.**
 20 Q. Okay. And I'm not sitting here debating the
 21 legality of it, but I'm trying to find out --
 22 **A. Oh, I know. But, you know, every little thing**
 23 **in this Township matters. And if I don't mention**
 24 **that, I'm sure somebody will.**
 25 Q. Okay. So it's an eight by ten and you said a
 KINSELLA, HARTIGAN & KELZER, INC.

1 **corn maze tour.**
 2 Q. Okay.
 3 **A. Certain times of the year when the apple orchard**
 4 **is open to the public.**
 5 Q. Okay. Now, we talked about the Howl-O-Ween
 6 Haunt and then the Winter Wonderland and also
 7 talked about your year-round hours and admission
 8 prices. Can somebody buy a season pass instead
 9 of paying admission each time?
 10 **A. If they want to.**
 11 Q. How much does a season pass cost?
 12 **A. It depends. Anywhere from \$25 to \$60, I think.**
 13 Q. Okay. What are the -- how do you determine the
 14 price?
 15 **A. Family or individual.**
 16 Q. Okay. And when -- and just referring kind of
 17 generally to the Exhibit and the hours, with your
 18 posted hours, are those the hours that anybody
 19 from the public can come to those events?
 20 **A. Yes.**
 21 Q. Okay.
 22 **A. Kind of like the apple orchard.**
 23 Q. Do you sell merchandise during these events?
 24 **A. We sell fur and other fur-related products.**
 25 Q. And like what's an example of a fur related
 KINSELLA, HARTIGAN & KELZER, INC.

1 portable building?
 2 **A. Yes.**
 3 Q. Okay. And you call it the trading post?
 4 **A. Yes.**
 5 Q. Okay. And so like is that used as a gift shop
 6 or what do you call it?
 7 **A. The trading post.**
 8 Q. Okay. Is that something that is only open
 9 during these events or do you have it open
 10 outside of those hours?
 11 **A. Just these hours.**
 12 Q. Okay.
 13 **A. Unless, I mean, we get taxidermists and stuff**
 14 **that come in and like fur buyers that come in.**
 15 Q. And for them, do they have to make a special
 16 appointment with you?
 17 **A. Those, yes.**
 18 Q. Now, you mentioned that it's an eight by ten,
 19 it's portable. Is there -- even though it's
 20 portable, is there a certain spot that you have
 21 it on the property?
 22 **A. I'm sorry?**
 23 Q. Or do you move it? If you don't understand, let
 24 me know.
 25 **A. I just put it there. I can move it anytime I**
 KINSELLA, HARTIGAN & KELZER, INC.

1 want. Does that make sense?

2 Q. Yes.

3 A. Because next spring it will probably move

4 somewhere else.

5 Q. Okay.

6 A. Because right now I have it next to another

7 portable building where I have my Cougar cubs in.

8 So when the Cougar cubs get too big, then the

9 buildings will be moved.

10 Q. Okay.

11 A. So. If it's portable, yes, I can move it

12 somewhere else.

13 Q. Okay. So you don't -- you don't have it in a

14 designated spot. It's -- you just, depending on

15 what event you have going on, you move it?

16 A. It depends on the animals.

17 Q. Okay. So, where is this eight by ten structure

18 currently located say in respect to the barn?

19 A. It's on the west side of the barn.

20 Q. How long has it been there?

21 A. Three months.

22 Q. Okay.

23 A. Well, September. Wherever we're at right now.

24 Q. Okay. When was the most recent event at the

25 property?

KINSELLA, HARTIGAN & KELZER, INC.

1 A. Okay.

2 Q. Would that be this Sunday, this past Sunday?

3 A. Explain "event".

4 Q. The Winter Wonderland.

5 A. You mean like when we're open in general?

6 Q. Yes.

7 A. Okay. I guess it's every weekend.

8 Q. Okay. So are you going to be open --

9 A. Tomorrow.

10 Q. -- this weekend?

11 A. Yes.

12 Q. Tomorrow?

13 A. Yes.

14 Q. Okay. If somebody is at the property and they

15 need to use the restroom, where do they go?

16 A. I have a portable outhouse. It's a compostable

17 toilet about four feet tall. You need a little

18 step stool to get in it. It's in a little wooden

19 building that I can move with my skid anytime I

20 want to. In fact, there is two of them.

21 Q. Two portable outhouses?

22 A. Uh-huh.

23 Q. Okay. Have you advertised for the events

24 besides the website?

25 A. I put in one ad this year in the paper for the

KINSELLA, HARTIGAN & KELZER, INC.

1 Winter Wonderland about three weeks ago.

2 Q. Okay.

3 A. And we do Facebook and our website just like the

4 apple orchard does.

5 Q. And you keep saying just like the apple orchard.

6 What apple orchard are you referring to?

7 A. The Applewood Apple Orchard. That's a legal use

8 by rights, according to the Township.

9 Q. Okay.

(Whereupon, PETTER Exhibit
Numbers 6 through 12 were
marked for identification by
the court reporter.)

BY MS. ANGOLKAR:

15 Q. Okay. I had these Exhibits marked and they are

16 Exhibits 6 through 12. And I'm done asking you

17 about the others, so you can move those to the

18 side if you want. These are photographs that I

19 suspect it's probably the first time you've seen

20 them. And these are photographs that have been

21 provided to the Township. So first, the first

22 one, Exhibit 6. And we see a sign by the

23 electric post here and then kind of off in the

24 background. So the upper left-hand corner of the

25 picture there is what looks like a sign and maybe

KINSELLA, HARTIGAN & KELZER, INC.

1 kind of some wolf eyes. Do you recognize that?

2 A. Uh-huh.

3 Q. Okay. Is that a sign that you have for giving

4 directions to your property, or what is that for?

5 A. The sign by the telephone pole must be an old

6 sign. I forgot to pull it. Because the sign up

7 by the road you can tell I've taken the Wolves,

8 Woods and Wildlife off it. That's why the top of

9 it is so black.

10 Q. Okay. So it used to have the name on it?

11 A. It used to have Wolves, Woods and Wildlife on

12 it.

13 Q. Okay. And it looks like kind of an arrow

14 pointing to the right. Is your property in that

15 direction?

16 A. Right.

17 Q. Okay. So is this like somewhere where somebody

18 can turn to go there?

19 A. Right.

20 Q. Okay. And why did you paint, or why did you

21 black over Wolves, Woods and Wildlife on that?

22 A. Because Wolves, Woods and Wildlife really

23 doesn't show therein -- I lost by default. So

24 I'm not allowed to have a WWW show on that

25 property.

KINSELLA, HARTIGAN & KELZER, INC.

1 Q. Okay. And so then looking to the next page?
 2 **A. It's the same sign.**
 3 Q. Okay. And then the next page, Exhibit 8, is
 4 that the same as well?
 5 **A. That's the same sign.**
 6 Q. Okay. And then looking at Exhibit 9, do you --
 7 first, do you recognize that sign?
 8 **A. Yes.**
 9 Q. Do you recall where that would have been?
 10 **A. That is out front of Joey Miller's house.**
 11 Q. Whose house?
 12 **A. Joey Miller.**
 13 Q. Okay. And is that near your property?
 14 **A. About three miles away.**
 15 Q. Okay. What direction from your property?
 16 **A. North.**
 17 Q. Okay.
 18 **A. And that was before I lost on default.**
 19 Q. Okay. And then looking at the next page, so
 20 Exhibit 10.
 21 **A. Yes.**
 22 Q. In the lower right-hand corner we see a couple
 23 of signs. First, do you recognize those signs?
 24 **A. Yes.**
 25 Q. And we see the pictures of Kenwood Trail. Does
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1 that help you recall where the signs are?
 2 **A. Yes.**
 3 Q. Okay. And is that something -- did you put the
 4 signs there?
 5 **A. I did, yes.**
 6 Q. Okay. And why did you put the signs there?
 7 **A. To let people know what we're doing.**
 8 Q. Okay.
 9 **A. And as you can see, it doesn't say Wolves, Woods**
 10 **and Wildlife on it.**
 11 Q. Okay.
 12 **A. That's why the top of that is painted over with**
 13 **a sticker over the top.**
 14 Q. Okay. And looking at Exhibit 11.
 15 **A. God, tell Gloria she's been busy.**
 16 Q. Okay. And when you say Gloria, who are you
 17 referring to?
 18 **A. Gloria Belzer or Nancy Stauber.**
 19 Q. And so looking at Exhibit 11, and do you then
 20 recognize the sign here as well?
 21 **A. Yes. Same thing.**
 22 Q. Okay. And did you put the signs in that
 23 location?
 24 **A. Actually I didn't put them on this one, no.**
 25 Q. Okay. Do you know who did?
 KINSELLA, HARTIGAN & KELZER, INC.

1 **A. Probably Adam or Danny.**
 2 Q. Okay. And then similarly Exhibit 12. First, do
 3 you recognize the sign?
 4 **A. Yes.**
 5 Q. And is that your sign?
 6 **A. Yes.**
 7 Q. And then do you recognize the location?
 8 **A. Yes.**
 9 Q. Okay. And where is that location?
 10 **A. Well, it says Muller Family Theatres.**
 11 Q. And can you tell me like what street that would
 12 be?
 13 **A. Not a clue.**
 14 Q. Okay. And is there a general point of reference
 15 of an area of Lakeville that would be? If I
 16 don't personally know that, can you tell me --
 17 **A. By Muller Family Theatres.**
 18 Q. Is it by any kind of major highway?
 19 **A. 35.**
 20 Q. Okay. Do you know what exit that would be by?
 21 **A. 70.**
 22 Q. Okay. I'm just about done. I just want to take
 23 a quick break and then we should be able to wrap
 24 up here.
 25 (Whereupon, a recess was taken,
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1 after which the following
 2 proceedings transpired.)
 3 BY MS. ANGOLKAR:
 4 Q. Okay. I just have a few more questions and we
 5 should be able to wrap up here. First, earlier
 6 we talked about your Cougar Jake?
 7 **A. Uh-huh.**
 8 Q. When did you get a second Cougar?
 9 **A. Like two years. So a year after we got him.**
 10 Q. Okay. Was that a male or female?
 11 **A. Female.**
 12 Q. Okay. And then when did they -- did those two
 13 breed?
 14 **A. Well, we've had four litters of stillborns. And**
 15 **so then we got another female to breed with Jake.**
 16 **And then we got another male to breed with Leena.**
 17 **And then this year they are both able to breed.**
 18 **But then Jake and Leena had kittens this year.**
 19 Q. Okay. So was this the first year the first time
 20 there was a live litter?
 21 **A. Yes.**
 22 Q. Okay. When did you get the second female?
 23 **A. She's five.**
 24 Q. Okay. And then how old is the second male?
 25 **A. He's a year and a half.**
 KINSELLA, HARTIGAN & KELZER, INC.

1 Q. How old do the Cougars have to be to start
 2 breeding?
 3 A. **Three.**
 4 Q. Okay. So the year-and-a-half-old male, he's not
 5 a breeder yet?
 6 A. **No.**
 7 Q. Okay.
 8 A. **He will breed with Kiara, one of the kittens we**
 9 **have now, and then would possibly breed with**
 10 **Nala. And then Jake and Leena will keep**
 11 **breeding.**
 12 Q. Okay. When did you -- when did you first start
 13 doing tours on the property?
 14 A. **Last November. Well, official tours.**
 15 Q. Okay. And by official I mean --
 16 A. **We actually opened up to the public. But before**
 17 **then we've always done Girl Scouts and Boy Scouts**
 18 **and...**
 19 Q. Okay. And so I guess that's my question, is how
 20 long have you done tours, whether it was for the
 21 Girl Scouts or if it was advertised?
 22 A. **Probably since '06, when I first got my USDA**
 23 **license?**
 24 Q. And was that on the property?
 25 A. **Yes.**

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1 A. **Sole proprietorship. I guess I consider both of**
 2 **them the same thing.**
 3 Q. Okay. Considering yourself individually or the
 4 sole proprietorship, so we could use them
 5 interchangeably?
 6 A. **Right.**
 7 Q. Okay. And then as opposed to off the property,
 8 who exhibits off the property?
 9 A. **Wolves, Woods and Wildlife does. Basically what**
 10 **we said was is Fur-Ever Wild, home of Wolves,**
 11 **Woods and Wildlife, as in that's where we keep**
 12 **the animals. That's like the home base.**
 13 Q. And then for exhibiting, that would be Wolves,
 14 Woods and Wildlife off the property; and then on
 15 the property it may be any of the organizations?
 16 A. **I don't consider it exhibiting on the property.**
 17 **I consider it agri-tours. Off the property I**
 18 **consider it exhibiting.**
 19 Q. Okay. So agri-tours on the property, to use
 20 your term, that can be Fur-Ever Wild, WWW or it
 21 can be your sole proprietorship that does the
 22 agri-tours?
 23 A. **Well, not anymore.**
 24 Q. Okay. And when you say "not anymore", what do
 25 you mean?

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1 Q. Earlier you referenced blacking out Wolves,
 2 Woods and Wildlife on the signs to your property.
 3 Was Wolves, Woods and Wildlife exhibiting to the
 4 public on your property?
 5 A. **Not necessarily, no. They were signs that we**
 6 **used for shows. And with our budget, I didn't**
 7 **have enough money to buy other signs. So we**
 8 **just -- we basically used them for the eyes.**
 9 Q. Okay. So, who -- and when I say "who", meaning
 10 person or entity -- who was exhibiting to the
 11 public on the property?
 12 A. **I am.**
 13 Q. Okay. And has it always been you?
 14 A. **Usually, yes.**
 15 Q. And when you say "usually", if it wasn't you,
 16 who was it?
 17 A. **It was either Fur-Ever Wild. The Wolves, Woods**
 18 **and Wildlife once in a while would have some**
 19 **education there.**
 20 Q. Okay. So when we were talking about the
 21 Howl-O-Ween and Winter Wonderland events for this
 22 year, who was hosting those?
 23 A. **I was.**
 24 Q. Okay. And is that you individually or you as
 25 the Fur-Ever Wild sole proprietorship?

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1 A. **Because Fur-Ever Wild Limited and Wolves, Woods**
 2 **and Wildlife lost by default. So they are not**
 3 **allowed to do anything on the property.**
 4 Q. Okay. Just a few questions about some of the
 5 animals. I think earlier that you mentioned that
 6 you sell rabbit pelts. Do you raise rabbits, or
 7 where do the rabbits come from?
 8 A. **I usually get that fur in. We do raise some.**
 9 Q. Do you pelt the prairie dogs?
 10 A. **As soon as I have babies, I will.**
 11 Q. And do you pelt the woodchucks?
 12 A. **Yes. You know, some of them are pelted. Some**
 13 **of the stuff is sold live.**
 14 Q. Okay.
 15 A. **Just like somebody would sell a calf, or just**
 16 **like someone would sell piglets or little sheep**
 17 **or baby goats. It doesn't say anywhere I can't**
 18 **sell them live either.**
 19 Q. Okay. I think I have no further questions. You
 20 probably don't know this for the deposition
 21 transcript. It is prepared and that is something
 22 where --
 23 MR. LEMMONS: Hang on.
 24 EXAMINATION:
 25 BY MR. LEMMONS:

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1 Q. Terri, I'm confused about one thing. Who --
 2 what entity actually conducted the first
 3 agri-tour on the property?
 4 A. I guess I've always done them.
 5 Q. Okay. But you've done -- I understand you
 6 probably conducted the tour, but under your own
 7 name or under the name of Wolves, Woods and
 8 Wildlife?
 9 A. I wouldn't say it was ever under Wolves, Woods
 10 and Wildlife.
 11 Q. Okay.
 12 A. I mean, it depends on -- it depends on if it was
 13 more open to the public or if it was more for
 14 education. You know, Wolves, Woods and Wildlife,
 15 we use that to help like the halfway houses and
 16 for the mentally handicapped and, you know, even
 17 the physically handicapped. Once in a while, you
 18 know, they would come in and, you know, donate
 19 something. But that was more for education for
 20 those people.
 21 Q. Okay. So Wolves, Woods and Wildlife did the
 22 educational tours on the property?
 23 A. Not all of them.
 24 Q. Okay. Not all of them, but they did?
 25 A. But some of the ones that -- they did more for
 KINSELLA, HARTIGAN & KELZER, INC.

1 like the handicapped because they needed tax
 2 help.
 3 Q. Okay. I see. So for the handicapped tours,
 4 those are conducted by Woods, Wolves and
 5 Wildlife?
 6 A. Wolves, Woods and Wildlife.
 7 Q. Thank you, Terri. Thank you. So they conducted
 8 the handicapped tours?
 9 A. Yes.
 10 Q. All right. And they have always conducted the
 11 handicapped tours?
 12 A. Yes.
 13 Q. Okay.
 14 A. Because it was one non-profit helping another
 15 usually.
 16 Q. I understand. So many entities, it's hard to
 17 keep them straight. Now, one other thing: The
 18 unofficial tours didn't start -- and you had --
 19 before you said official tours and unofficial
 20 tours. And my understanding was the official
 21 tours only started like a year ago?
 22 A. Right.
 23 Q. Okay.
 24 A. Well, I suppose you could call them official
 25 tours, but we didn't have like open hours until a
 KINSELLA, HARTIGAN & KELZER, INC.

1 year ago.
 2 Q. Okay.
 3 A. We always were by appointment only.
 4 Q. Okay. So but then the Girl Scout tours and the
 5 Boy Scout tours, they didn't start until after
 6 you got your USDA license; right?
 7 A. In 2006.
 8 Q. Right. But you had the license first and then
 9 the tours started?
 10 A. Well, we did give them -- at that time I wasn't
 11 USDA regulated. So that's why I called them
 12 official, if you want to call it that, because at
 13 that time I was regulated.
 14 Q. Okay.
 15 A. Because I didn't know, starting in, you know,
 16 2003, I didn't know there was even a USDA.
 17 Q. All right.
 18 A. To be honest.
 19 Q. I understand. I'm sorry.
 20 MS. ANGOLKAR: That's okay. I should
 21 have asked those questions.
 22 MR. LEMMONS: That's all right. I'm
 23 done.
 24 MS. ANGOLKAR: Okay. So now that the
 25 deposition is completed, what happens is there is
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1 a transcript prepared by the court reporter, and
 2 what's called -- it's called read and sign. One
 3 option you have as a deponent is that you make
 4 arrangements with the court reporter to be able
 5 to review the transcript to see if he has
 6 correctly transcribed your testimony.
 7 The other option is that you can waive that
 8 if you believe that he has transcribed it
 9 correctly. And that's something that we're not
 10 able to counsel you on one way or the other. So
 11 basically at the end of a deposition somebody can
 12 say that they will read and sign the transcript
 13 or they will waive that. So you can let the
 14 court reporter know that.
 15 THE WITNESS: Yes. The attorney that
 16 I've been getting advice from said read and sign.
 17 MS. ANGOLKAR: Okay.
 18 THE WITNESS: Don't waive it.
 19 MS. ANGOLKAR: Okay. Thank you.
 20 (Whereupon, at 1:15 p.m. the
 21 foregoing deposition was
 22 terminated.)
 23 * * *
 24
 25 KINSELLA, HARTIGAN & KELZER, INC.

1 STATE OF MINNESOTA)
) ss
2 COUNTY OF HENNEPIN)

3 BE IT KNOWN THAT I, Jeffrey G. Kelzer,
4 the undersigned, a duly commissioned and
5 qualified notary public within and for the County
6 and State aforesaid, do hereby certify that
7 before the giving of her deposition, the said
8 TERESA PETTER was by me first duly sworn upon her
9 oath to depose the whole truth and nothing but
10 the truth; that the foregoing is a true and
11 correct copy of my original stenotype notes taken
12 at said deposition; that I am neither a relative
13 of, nor attorney for, any of the parties to the
14 cause and have no interest whatsoever in the
15 result of the same; that the cost of the original
16 has been charged to the party who noticed the
17 deposition, and that all parties who ordered
18 copies have been charged at the same rate for
19 such copies.

20 WITNESS MY HAND AND SEAL this ___ day of
21 _____, 2012.

22 _____
23 Jeffrey G. Kelzer
Notary Public
24 Hennepin County, Minnesota

25 My commission expires January 31, 2015.
KINSELLA, HARTIGAN & KELZER, INC.

1 DEPOSITION OF TERESA PETTER:
2 REPORTED BY JEFFREY G. KELZER

3 If not returned by January 19, 2013 for
4 attachment to the original transcript, the
5 reading and signing will be deemed waived.

6	PAGE	LINE	CORRECTION	REASON
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18 BE IT KNOWN THAT I, TERESA PETTER, having read
19 my deposition, do hereby attest to the accuracy
20 of its transcription, noting any changes and the
reasons (if any) therefor above.

21 _____
Date TERESA PETTER
22 Return to: STEPHANIE A. ANGOLKAR, ESQ.
23 Iverson Reuvers
24 9321 Ensign Avenue South
Bloomington, Minnesota 55438