

DOG BITE LAWS IN ALL 50 STATES

This chart provides a summary of laws regarding the liability of a dog owner for personal injuries or property damage caused by a dog attack or bite. Dog bite law is a unique combination of city and county ordinances, state statutory law, state case law, and common law. The law varies from state to state. Generally, if the dog owner knows that the dog has exhibited a tendency or intention to someday bite a person, liability can attach. This is known as “*scienter*” (knowledge or knowing) and is referred to as the “One Bite” Rule. Most states hold a dog owner responsible for negligence that results in any injury caused by a dog. This can take the form of general negligence or negligence *per se* (violation of a statute). Sometimes, the liability depends on whether the dog bite occurred on or off the owner’s premises. Some states apply the Doctrine of Premises Liability when the victim is harmed on the dog owner’s property. Premises liability is a specific area of law that governs liability involving owners of property and landlords.

Other states base liability on statutes which create liability in the absence of *scienter*, negligence, or intentional behavior. These are referred to as “statutory strict liability states” and vary from state to state. They sometimes hold the owner liable automatically if their dog bites somebody. In “strict liability” states, the dog does not get “one free bite” as they do in states which adhere to the “One Bite” Rule.

Still other states complicate matters by mixing and matching their laws. Some of these complicated dog bite statutes impose strict liability under limited circumstances or for limited types of losses, while relying more heavily on the “One Bite” Rule. The states having statutes which incorporate the “One-Bite” Rule are referred to as “mixed dog bite law states” or simply “mixed states”. For example, New York imposes strict liability only for a bite victim’s medical bills. To recover other elements of damages, he has to meet one of the other burdens discussed above.

States often provide certain exceptions to liability, including if the victim is a trespasser, veterinarian, was committing a felony, assumed the risk, or if the dog was provoked by physical abuse or was a police dog. While the chart below is an excellent starting point to determine dog bite liability in all 51 jurisdictions, it should not be relied on as a thorough treatment of this area of law.

“Non-Bite” Dog Owner Liability

The chart below details the law in all 50 states with regard to the liability of a dog owner for a dog attack which involves a dog bite. However, there are other circumstances (besides being bitten by the dog) which can lead to liability of a dog owner. For example, a dog owner can be liable if the dog is permitted to be in a place where it should not be. In a **Tennessee** federal court case, the court allowed a lawsuit against a dog owner to proceed where the dog was not being aggressive, but the plaintiff tripped over the dog and was injured. *Cramer v. Oak Haven Resort, Inc.*, 32018 WL 4186392 (E.D. Tenn. 2018). A 35-pound dog named “Bear” was owned by Steve Marshall, who lived next to a cabin owned and operated by Oak Haven Resort. Bear routinely wandered over to the resort and was fed by the guests. Marshall had a collar on Bear which read “Do Not Feed This Dog.” The plaintiff never asked Oak Haven to remove the dog from the premises, and one evening she tripped over the dark-colored dog laying on the porch at night and was injured. The porch lights were turned off and the plaintiff could not see Bear. The plaintiff sued Marshall and the Oak Haven, alleging: (1) Oak Haven was negligent for allowing the dog to hang around the property, and (2) Marshall was negligent for allowing the dog to leave his property and wander over to the cabin.

Plaintiff asserted that the common law has long recognized the special legal relationship between innkeepers and registered guests, arguing that Oak Haven was in a special relationship with her and owed her a continuing and affirmative duty to act for her protection. Plaintiff acknowledged that Bear did not attack her or act aggressively towards her. Oak Haven argued that it could not be liable under Tenn. Code Ann. § 44-8-413, which provides that a dog owner is liable for all damages, regardless of prior knowledge of dog's vicious propensities, because it is not the dog owner and only dog owners have liability under Tennessee law. It argued that Oak Haven is liable because it habitually allowed the dog to come onto its property. Marshall argued he could not be held liable for negligence § 44-8-413 because the dog was on the premises with the permission and consent of the owner of the premises and was not "running at large." The Marshalls state that because the dog was not running at large, the plaintiff was required to establish that they knew or should have known of the dog's dangerous propensities, which everyone acknowledged was not the case. The court denied the defendants' motions for summary judgment, stating:

There is evidence in the record that Oak Haven allowed Bear to roam on its property. Oak Haven asserts that it does not regularly keep the dog on its property, but this is a question of fact for the jury. When Plaintiff called to report the dog to Oak Haven, Oak Haven instructed her not to feed the dog and that the dog would go away. While Plaintiff did not specifically ask Oak Haven to remove the dog, the Court finds that such facts can be properly submitted to the jury to weigh and consider. Oak Haven asserts that Plaintiff must establish that the dog had a dangerous propensity of which Oak Haven was aware and cites to several Tennessee decisions holding the same. The Court disagrees with Oak Haven's position because the dog's dangerous propensities are irrelevant in the instant matter. As the Court has previously explained, all parties agree that Bear did not attack Plaintiff or act vicious toward anyone. See [Doc. 71 at 10] ("As this Court has already explained, Plaintiff was not bitten or attacked by Bear—she allegedly tripped over Bear. Whether Bear exhibited any dangerous behavior is irrelevant because it was not Bear's behavior that caused the fall, but instead, the mere presence of Bear."). Accordingly, the Court finds Oak Haven's position not well taken.

The court also held that Oak Haven could not be held liable under the statute, because it was not the "owner" of the dog. With regard to the Marshalls, the court held that:

The Court finds that there are genuine issues of material fact as to whether the dog was "running at large" within the meaning of the statute. The jury should hear the testimony to determine whether Oak Haven gave permission for Bear to be on the premises. Thus, the Court agrees with Plaintiff that the question of whether Oak Haven's actions and/or silence rose to the level of permission as contemplated by the statute is a factual question for the jury to decide. Further, as emphasized above, the Marshalls have two obligations under the statute: (1) a duty to keep the dog under reasonable control at all times, and (2) to keep that dog from running at large. Tenn. Code Ann. § 44-8-413(a)(1). Accordingly, the Court finds that Plaintiff's claim pursuant to Tennessee Code Annotated § 44-8-413 against the Marshalls may proceed to trial.

The court did, however, grant the defendants' motions in part, indicating that the question of whether Oak Haven's actions and/or silence rose to the level of permission as contemplated by the statute is a factual question for the jury to decide.

"Dog Fright" Cases

When a dog does not "bite" the plaintiff but chases or frightens the plaintiff into running away and the plaintiff trips and falls or is otherwise injured as a result of his efforts to flee the dog, liability depends on the facts. A "dog fright" case occurs when the behavior or demeanor of the dog causes a reasonable person to take defensive action which results in that person's injury, but no dog bite is involved. In one case, a jogger sustained brain damage while being chased by two Rottweilers, causing him to veer into the road and get struck in the back of his head by the side-view mirror of a passing truck. A jury awarded \$6 million against the owner of the dogs and the owner and manager of the golf course. (Greg Moran, "Man struck by truck while fleeing dogs awarded \$6 million," San Diego Union-Tribune, February 28, 2002.)

In **Hawaii**, one case involved injuries sustained by two plaintiffs while fleeing what was believed to be an imminent attack by a German shepherd dog, causing them to fall off a natural rock wall onto rocks some ten feet below. *Farrior v. Payton*, 562 P.2d 779 (Haw. 1977). In Hawaii, § 663-9 seems to establish strict liability by clearly eliminating knowledge of the dangerousness or viciousness of a dog as an element of proof. However, in *Hubbell v Iseke*, 727 P2d 1131 (Haw. App. 1986), the Court determined that the plaintiff must prove at least negligence on the part of the defendant. The court noted that one of the reasons the dog owner kept the dog was to deal with

the occasional ‘problem of trespassers’. In addition, the owner had knowledge of the dog’s propensities which gave him notice that someone was close enough to motivate the dog to bark and run. He owed a duty to control the German shepherd dog to prevent harm to that person.

In a **New York** case, a lawsuit was brought against a dog owner for injuries sustained when the plaintiff slipped on snow-covered sidewalk after a German Shepherd dog emerged from behind a brick wall on the owner’s property and hurled itself at fence separating sidewalk and property. The court held that the right to harbor animals must yield to the duty of containing them in reasonable manner as to avoid harm that can befall unsuspecting persons, lack of a bite or any physical contact notwithstanding. The court added that owning and keeping a German Shepherd dog in an urban area requires the highest standards to be employed in protection of an innocent public, and that the owner had a duty to do other than erect fence knowing that it bordered upon sidewalk used by public and that his dog had propensity to charge at and frighten passing pedestrians.

In a **Kansas** case, the issue was whether the defendants could properly be held liable for personal injuries suffered by a plaintiff when, frightened by defendant’s “bouncy, pesky, yappy little dog,” he lost control of and fell from a bicycle. *Henkel v. Jordan*, 644 P.2d 1348 (Kan. App.1982). The dog owners had been put on notice by numerous individuals that the dog had frightened people who passed along the street. The court held that the facts could support a finding of negligence.

The following chart details the dog bite laws in all 50 states. Be sure to check the local city and county ordinances, because they often have laws and regulations governing the keeping of animals also.

STATE	AUTHORITY	ADDITIONAL INFORMATION
ALABAMA	<p>Ala. Code §§ 3-6-1, 3-6-2, 3-6-3, 3-6-4. <i>Humphries v. Rice</i>, 600 So. 2d 975 (Ala. 1992)</p>	<p>Dog owner is liable for damage caused by dog if, without provocation, the dog bites or injures any person who is at a place where he or she has a legal right to be, but only when the plaintiff is on property <i>owned or controlled by the owner</i> of such dog at the time such bite or injury occurs or when the plaintiff was chased off the property and was pursued by the dog. Ala. Code § 3-6-1.</p> <p>Plaintiff is lawfully on the property awfully upon the private property when he is delivering mail, reading meters, delivering milk, or when making repairs to any public utility or service on the property, or when he is on such property upon the invitation, either expressed or implied, of the owner or lessee of such property. Ala. Code § 3-6-2.</p> <p>Dog owner can prove he had no knowledge of any circumstances indicating the dog was vicious, and if not, then the plaintiff can only recover “actual expenses” incurred. Ala. Code § 3-6-3.</p> <p>Plaintiff can still pursue common law negligence claim against dog owner. Ala. Code § 3-6-4.</p> <p>In 1992, the Alabama Supreme Court radically expanded the means of proving scienter (knowledge of dangerous propensity of the dog) by allowing for a jury finding based on actual or constructive knowledge of the “breed propensity” of the dog in question. The supreme court’s innovation was ostensibly a social policy measure fueled by well-publicized attacks by certain “dangerous breeds,” <i>i.e.</i>, Rottweilers, Doberman Pinschers, and Pit Bull Terriers. Unfortunately for the attorney involved in a dog-bite case, the question of how one goes about proving (or disproving) the breed propensity under the <i>Humphries</i> standard is not quite clear. The traditional common law rules for proving scienter would seem to apply but, even if they do, contending with the <i>Humphries</i> standard still presents various practical issues for the litigator.</p>

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ALASKA	<i>Sinclair v. Okata</i> , 874 F. Supp. 1051 (D. Alaska, Oct. 12, 1994); Reliance on <i>Restatement (Second) of Torts</i>	No Dog Bite Statute. However, owner will often be found liable in the presence of negligence or strictly liable if the owner knew of the dog's dangerous propensities.
ARIZONA	Ariz. Rev. Stat. §§ 11-1020, 11-1025, 11-1026	No "One Bite" Rule. Owner strictly liable for bites occurring while dog is at large (§ 11-1020) or while in a public place (§ 11-1025). Only defense is provocation.
ARKANSAS	<i>Strange v. Stovall</i> , 261 Ark. 53, 546 S.W.2d 421 (Ark. 1977).	No Dog Bite Statute. Negligence on the part of the owner will lead to liability and knowledge of dangerous propensities will lead to strict liability.
CALIFORNIA	Cal. Civ. Code § 3342	Strict Liability on the dog owner where a dog bite occurs when victim is on public property or lawfully on private property.
COLORADO	Colo. Rev. Stat. § 13-21-124	Strict Liability upon the dog owner only in cases of "serious bodily injury". Otherwise, a "One Bite" Rule jurisdiction or requires proof of a dangerous propensity (5 "classifications"). Only economic damages under Strict Liability.
CONNECTICUT	Conn. Gen. Stat. Ann. § 22-357	Dog owner/keeper will be strictly liable for damages, unless victim committed a trespass, tort, or was abusing the dog. If victim is under the age of 7-years-old, there is a presumption against trespass/tort. Section 22-357 reads, "If any dog does any damage to either the body or property of any person, the owner or keeper, or, if the owner or keeper is a minor, the parent or guardian of such minor, shall be liable for the amount of such damage, except when such damage has been occasioned to the body or property of a person who, at the time such damage was sustained, was committing a trespass or other tort, or was teasing, tormenting or abusing such dog."
DELAWARE	Del. Code Ann. § 1711	Dog owner is liable for damages in all types of injuries caused to person or property by their dog.
DISTRICT OF COLUMBIA	D.C. Code Ann. § 8-1808	Application of Contributory Negligence. Victim is barred from recovery if it is found that their conduct is even minimally responsible for the incident.
FLORIDA	Fla. Stat. § 767.04	Dog owner can be found liable upon first bite, but comparative fault of victim can reduce damages by the percentage the victim is found liable. Dog owner not liable if they post an easily readable "Bad Dog" sign.
GEORGIA	Ga. Code Ann. § 51-2-7 Ga. Code Ann. §§ 4-8-1, 4-8-4, 4-8-5, 4-8-20 to 4-8-32	Dog owner who keeps a "vicious or dangerous" animal and allows it to run free, injuring someone who does not provoke it, may be liable in damages. However, this section doesn't apply to dogs subject to § 4-8-4(b). Establishes minimum standards for the control and regulation of dogs. Provides for the identification of dangerous/vicious dogs, requires registration for the possession of such dogs and the owner to maintain an enclosure, post warning signs, have a microchip implanted, and provide \$50,000 in liability insurance.

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HAWAII	Haw. Rev. Stat. Ann. § 663-9	§ 663-9 seems to establish strict liability by clearly eliminating knowledge of the dangerousness or viciousness of a dog as an element of proof. However, in <i>Hubbell v Iseke</i> , 727 P2d 1131 (Haw. App. 1986), the Court determined that the plaintiff must prove at least negligence on the part of the defendant.
IDAHO	Idaho Code § 25-2805	Dog owner will be liable if they were negligent or had knowledge of the dog's dangerous propensities.
ILLINOIS	510 I.L.C.S. 5/16 § 16	Dog owner will be liable for all injuries, even if not caused by a bite, absent provocation or trespass by the victim. The statute reads: "§ 16. Animal attacks or injuries. If a dog or other animal, without provocation, attacks, attempts to attack, or injures any person who is peaceably conducting himself or herself in any place where he or she may lawfully be, the owner of such dog or other animal is liable in civil damages to such person for the full amount of the injury proximately caused thereby." As of 1/1/22, insurance companies that write homeowners insurance will be required to report to the best of their ability all dog bite claims to the state.
INDIANA	<i>Ind. Code Ann. § 15-20-1-3.</i> <i>Poznanski v. Horvath</i> , 788 N.E.2d 1255, 1259 (Ind. 2003); <i>Ross v. Lowe</i> , 605 N.E.2d 786, 788 (Ind. App. 1992).	Previous case law held that a dog owner was liable under negligence principles if the owner knows or had reason to know that the dog, or dog breed, has dangerous propensities. In 2008, the Indiana legislature passed § 15-20-1-3, which provides that if a dog bites somebody, without provocation, and that person is acting peaceably and is in a location where he is required to be to discharge a duty imposed by the laws of Indiana, the United States, or the U.S. Postal Service, the owner is liable even if the dog has never bitten anyone and has no vicious propensity.
IOWA	Iowa Code Ann. § 351.28	Dog owner will be strictly liable if their dog bites (or attempts to bite) a person or a domestic animal. (Exception is if the dog has rabies and the owner does not know).
KANSAS	<i>Mercer v. Fritts</i> , 9 Kan. App.2d 232, 676 P.2d 150 (Kan. 1984); <i>Restatement (Second) of Torts</i> § 518. <i>Henkel v. Jordan</i> , 644 P.2d 1348 (Kan. App. 1982).	Dog owner will be liable if it is found that they had knowledge of the dog's vicious propensities, or if they acted negligently. <i>Henkel</i> was a "dog fright" case in which the plaintiff was frightened by a pesky pup while riding his bike, and fell, suffering injuries. The court did not focus on the "vicious propensity" standard that would be applicable to a "dog bite" case, but rather applied a more general foreseeability standard (defendants knew the dog had frightened people several times before). The court affirmed a jury award in favor of the plaintiff.
KENTUCKY	Ky. Rev. Stat. § 258.235	Dog owner will be liable for all damage to person, livestock, or property, caused by the owner's dog. The law gives all people authority to kill a dog seen attacking someone.
LOUISIANA	La. C.C. Art. § 2321	Dog owner will be held liable for damages, so long as the victim proves that the owner could have prevented the incident.

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MAINE	Me. Rev. Stat. Ann. § 3961	Dog owner will be liable for damages which occurred when victim was not on the owner's/keeper's premises.
MARYLAND	<i>Herbert v. Ziegler</i> , 261 Md. 212, 139 A.2d 699 (Md. 1958); <i>Twigg v. Ryland</i> , 62 Md. 380, 1884 WL 5954 (Md. 1884).	Dog owner will be held liable if victim can prove that the dog owner knew of the dog's vicious propensities. However, if the victim is found to be even 1% at fault, they cannot recover anything.
MASSACHUSETTS	Mass. Gen. Laws Ann. 140 § 155	Dog owner will be held liable for damages caused by their dog, absent trespass, teasing, or tormenting. If the victim is under the age of 7-years-old, the presumption is that there was no trespass or provocation.
MICHIGAN	Mich. Comp. Laws Ann. § 287.351	Dog owner will be liable for all damages resulting from a dog bite when the victim is either on public property, or lawfully on private property.
MINNESOTA	Minn. Stat. Ann. § 347.22	Liability against the dog owner will be almost absolute. Any comparative negligence on the part of the victim is not considered.
MISSISSIPPI	<i>Poy v. Grayson</i> , 273 So.2d 491 (Miss. 1973).	"One-Bite" Rule. Dog owner is only liable if they have knowledge of their dog's vicious propensities.
MISSOURI	Mo. Rev. Stat. § 273.036	Dog owner will be held liable for damages to victim, livestock, and property while victim was on public property, or lawfully on private property. However, victim's damages may be reduced by the percentage that they were at fault.
MONTANA	Mont. Code Ann. § 27-1-715	Dog owner will be held strictly liable for damages caused by their dog, if the incident occurred in an incorporated town or city.
NEBRASKA	Neb. Rev. Stat. § 54-601	Dog owner will be held strictly liable for damages caused by their dog, unless the dog is playful and mischievous – in these cases, the "One-Bite" Rule applies.
NEVADA	Nev. Stat. Ann. § 202.500	No civil liability statute for an average dog bite. The common law for liability, however, states that if the plaintiff can prove that the dog owner's negligence led to the dog bite injury, the plaintiff may recover damages for the dog bite injury. Section 202.500 makes owner guilty of felony if "vicious" dog (has previously inflicted serious personal injury) bites as opposed to merely a "dangerous" (two bites within 18 months) dog.
NEW HAMPSHIRE	N.H. Rev. Stat. Ann. § 466:19	Dog owner will not only be held strictly liable for all physical damages caused by their dog, but also for any mischievous acts which causes injury.

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NEW JERSEY	N.J. Stat. Ann. § 4:19-16	Dog owner will be held strictly liable for a bite which results in damages to the victim when the victim is on public property or lawfully on private property.
NEW MEXICO	<i>Smith v. Village of Ruidoso</i> , 128 N.M. 470, 994 P.2d 50 (N.M. 1999).	Dog owner will only be found strictly liable if they had prior knowledge of the dog's vicious propensities, or liable if they were negligent.
NEW YORK	N.Y. Agriculture & Markets Law, § 123(10)	Dog owner will be held strictly liable for medical damages, but for all other damages the victim must prove that the owner knew (or should have known) of the dog's dangerous propensities.
NORTH CAROLINA	N.C. Gen. Stat. Ann. § 67-12, 67-4.4, 67-4.1	<p>Dog owner will only be liable if they intentionally, knowingly, and willfully let their dog violate the "running at large" statute at the time of the incident. N.C. Gen. Stat. Ann. § 67-12.</p> <p>It is unlawful for an owner to leave a "dangerous dog" unattended on the owner's real property. A dangerous dog is defined as a dog who has, without provocation, killed or inflicted severe injury on a person; or is determined by the person or Board designated by the county or municipal authority responsible for animal control to be potentially dangerous because the dog has engaged in one or more of the behaviors listed in subdivision (2) of this subsection. N.C. Gen. Stat. Ann. § 67-4-2.</p> <p>The owner of a dangerous dog shall be strictly liable in civil damages for any injuries or property damage the dog inflicts upon a person, his property, or another animal. N.C. Gen. Stat. Ann. § 67-4.4.</p>
NORTH DAKOTA	<i>Sendelbach v. Grad</i> , 246 N.W.2d 496 (N.D. 1976).	Dog owner will be liable for damages, if the victim can prove that the dog owner was negligent and negligence caused the injury.
OHIO	Ohio Rev. Code. Ann. § 955.28	Dog owner will be held liable for any damages caused by dog. Trespass is a defense. Individuals are protected if they feared a dog bite and killed/maimed the dog.
OKLAHOMA	Okla. Stat. Ann. § 4-42.1	Dog owner will be held responsible for all damages, absent trespass or provocation.
OREGON	<i>Westberry v. Blackwell</i> , 282 Or. 129, 577 P.2d 75 (Or. 1978).	Dog owner will be liable for victim's bite injuries if they knew (or had reason to know) of their dog's dangerous propensities.

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PENNSYLVANIA	Pa. Consol. Stat. § 502 A	Dog owner will be strictly liable if they had knowledge of their dog’s violent propensities. If the dog owner did not know, they will be liable for all damages (medical plus other damages) for severe injuries, but only liable for medical damages for non-severe injuries. Pennsylvania law does not impose absolute liability upon dog owners from torts caused by their dogs. <i>McCloud v. McLaughlin</i> , 837 A.2d 541 (Pa. Super. 2003) (citing <i>Deardorff v. Burger</i> , 606 A.2d 489 (Pa. Super. 1992)). The plaintiff must prove that the dog owner acted negligently. Pennsylvania has abolished the “one free bite” rule, which required that an owner restrain his or her dog only after its behavior evidenced viciousness. <i>Villaume v. Kaufman</i> , 550 A.2d 793 (Pa. Super. 1988) (citing <i>Freeman v. Terzya</i> , 323 A.2d 186 (Pa. Super. 1974)). A plaintiff cannot recover for injuries sustained in an incident involving a dog bite by merely establishing that the dog had a propensity for viciousness and the owner was aware of the same, the plaintiff must demonstrate that the owner failed to take proper precautions to preclude the dog from acting in a vicious manner. <i>Darby v. Clare F. and R. Co.</i> , 170 A. 387 (Pa. Super. 1934). Circumstances that constitute knowledge of the dog’s viciousness or dangerous propensities include but are not limited to: (1) complaints brought to the owner’s attention; (2) fighting with other dogs; (3) frequent confinement of the dog; (4) warning signs on the owner’s premises; and (5) statements by the owner as to the dog’s character. <i>Sheptak v. Wagner</i> , 23 Pa. D. & C.3d 46 (1982). Pennsylvania case law clearly adopts the defense of assumption of the risk for dog bite cases. <i>Groner v. Hedrick</i> , 169 A.2d 302 (Pa. 1961).
RHODE ISLAND	R.I. Gen. Laws § 4-13-16	Dog owner will be held liable for all damages unless the dog was confined. If a dog owner is found liable for bite-damages a second time, the damages will be doubled.
SOUTH CAROLINA	S.C. Code Ann. § 47-3-110	Dog owner will be liable for all damages if victim was on public property or lawfully on private property.
SOUTH DAKOTA	<i>Blaha v. Stuard</i> , 640 N.W.2d 85 (S.D. 2002).	Dog owner will be liable if the victim can prove that the owner knew, or should have known, of the dog’s dangerous propensities, or if the owner was negligent.
TENNESSEE	Tenn. Code Ann. § 44-8-413	Dog owner is liable for all damages, regardless of prior knowledge of dog’s vicious propensities. Trespass is a defense.
TEXAS	V.T.C.A., Health & Safety Code § 822.005	Dog owner will be liable if the victim can prove that the owner had knowledge of the dog’s dangerous propensities, was negligent, a leash law was violated, or the owner caused the injury intentionally.
UTAH	Utah Code Ann. § 18-1-1	Dog owner is liable for damages, regardless of prior knowledge of dog’s vicious propensities. Government will not be held liable for dogs assisting law-enforcement.
VERMONT	<i>Hillier v. Noble</i> , 142 Vt. 552, 458 A.2d 1101 (Vt. 1983).	Dog owner will be liable to the victim for damages if it can be proven that the dog owner had knowledge (or should have known) of the dog’s prior dangerous behavior.

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VIRGINIA	<i>Butler v. Frieden</i> , 158 S.E.2d 121 (Va. 1967).	Recognizes common law duty of exercising ordinary care to protect other persons from injuries that might be inflicted by his dog and the dog owner is subject to civil liability for breach of that duty. Dog owner must have prior knowledge of dog's dangerous propensity, unless owner negligent or broke the law.
WASHINGTON	Wash. Rev. Code § 16-08-040	Dog owner will be held liable for damages, regardless of prior knowledge of dog's vicious propensities, absent provocation.
WEST VIRGINIA	W. Va. Code § 19-20-13	If the dog owner allows their dog to run at large, they will be liable for damages the dog inflicted on people or property while they were at large.
WISCONSIN	Wis. Stat. § 174.02(1)(a) – First Bite Wis. Stat. § 174.02(1)(b) – Second Bite	<i>First Bite (Without Notice of Dangerous Propensity)</i> . Dog owner is strictly liable for “full amount of damages caused by the dog injuring or causing injury to a person, domestic animal or property.” The owner will also pay penalty of “not less than \$50 or more than \$500 if the dog injures or causes injury to a person, domestic animal, property, deer, game birds or the nests or eggs of game birds.” <i>Second Bite (With Notice of Dangerous Propensity)</i> . Dog owner is strictly liable for “two times the full amount of damages caused by the dog injuring or causing injury to a person, domestic animal or property if the owner was notified or knew that the dog previously injured or caused injury to a person, domestic animal or property.” No claim based on “second bite” for damages caused by the dog to a domestic animal or to property.
WYOMING	<i>Borns ex rel. Gannon v. Voss</i> , 70 P.3d 262 (Wyo. 2003)	Dog owner will be liable if the victim can prove negligence or knowledge of the dog's dangerous propensities.

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