

DECLARATION OF [REDACTED]

I hereby affirm:

1. My name is [REDACTED]. I am a citizen of [REDACTED]. I am over the age of 18 years and competent to make this declaration. The information set forth in this declaration is based on my personal knowledge of events described herein unless stated otherwise. I can be reached at [REDACTED]

2. From [REDACTED] to [REDACTED], I worked for Culver Duck Farms, Inc. (hereinafter, “the facility”), a duck hatchery, farm, and slaughterhouse located at 12215 Co. Rd. 10 in Middlebury, Ind. I was a farmhand during most of the time I worked for this company, [REDACTED]. My duties as a farmhand primarily involved tending to ducks in the facility’s on-site barns, and often traveling to many of the company’s approximately 50 contract farms in order to carry out various tasks that included vaccination, weighing, sorting, and loading ducks.

3. During my time at the facility, I routinely observed that female ducks were excessively mounted and harmed by males due to what I suspect to be an inappropriate ratio of females to males, most notably in “Barn 16.” It was common to see a female duck being mounted by one male while several other males pulled the female’s feathers off, leaving the females with bloody, swollen, and scabby areas on their necks and other areas of their bodies. Every day that I worked in the barns, I saw ducks in poor condition because of this. I documented one such bird on [REDACTED] 2021 (See Video IMG_6850.mov). I also found a bird on [REDACTED], 2021 whom I suspect had been mounted so much that she would not move at all, and if I moved her head to a different position, she would simply freeze in that position (See Video IMG_6851.mov). I ensured that she was euthanized.

4. During my time at the facility, the company contracted with approximately 50 other farms to raise birds for them, and I visited many in my position as a farmhand. Most of these farms contained an average of 3,000-5,000 ducks. I frequently observed issues at the farms that led me to believe that Culver staff did not adequately manage them and did not correct obvious issues at them. I complained to manager [REDACTED] about some of the issues at these farms, but saw no actions taken to address them. For example, the conditions at one farm known to me as “The [REDACTED] Farm,” owned by [REDACTED] and located at GPS coordinates [REDACTED], were particularly poor. When I visited the farm approximately once per week in my duties as a farmhand, it appeared as though [REDACTED]’s children were tasked with providing most of the care for the approximately 3,000-4,000 birds confined there. On [REDACTED] 2021, I went to the farm and observed that feed tubes weren’t correctly blocked off. As a result, a large pile of feed had poured out onto the barn floor, killing three ducks and burying another, whom I dug out and saved (see Photographs 1.jpg, 2.jpg, and 3.jpg). I was also told by a supervisor in [REDACTED] 2021 that a water line at this farm had broken and 40 ducks died of dehydration. To my knowledge, the company still contracts with this farm to raise ducks.

5. During the time I worked in the facility's hatchery in [REDACTED], I saw facility workers kill dozens of ducklings per day in a grinder. This included some ducks who were still hatching from their eggs. I documented the facility's grinder on [REDACTED] 2022 (See Photographs 4.jpg and 5.jpg).

6. During my time at the facility, I was told by supervisor [REDACTED] that birds were stunned in an electrified water bath before they were slaughtered. In approximately [REDACTED] [REDACTED] 2021, I walked into a trucking office at the facility that had a video feed from cameras in the facility's slaughterhouse displayed on a computer screen. I saw on the video feed that ducks hanging on the line appeared to be conscious and moving while workers cut their throats.

7. During my time at the facility, the barns were not equipped with adequate systems to keep them dry. This was especially the case in the "Developer Barn," which often remained especially humid, and any new bedding placed in this barn quickly became saturated.

8. I hereby attest that the information contained in this affidavit is accurate to the best of my knowledge.

[REDACTED]

Subscribed on this day of [REDACTED] by [REDACTED].