



August 14, 2025

Clint and Cody Rodabaugh  
Co-Owners  
Rodabaugh Bros. Meats  
503 Basinger Rd.  
Pandora, OH 45877

Via e-mail to [REDACTED]

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

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## Re: Stunning Method and Facility Design

Dear Messrs. Rodabaugh:

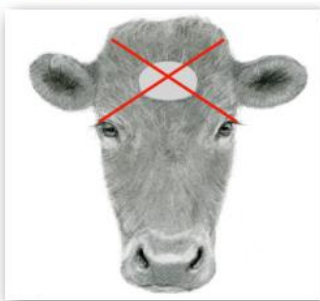
PETA's [investigation](#) into your facility revealed the following items that require urgent corrective action:

1. The slaughterer used a captive-bolt gun to stun cattle on the back of the head. Industry, veterinary, and government guidelines for slaughter specify that proper stunning is done by applying a captive bolt to these animals' foreheads.
- a. **North American Meat Institute (NAMI):**  
[https://www.meatinstitute.org/sites/default/files/documents/Meat\\_Industry\\_Stunning\\_Guide.pdf](https://www.meatinstitute.org/sites/default/files/documents/Meat_Industry_Stunning_Guide.pdf)

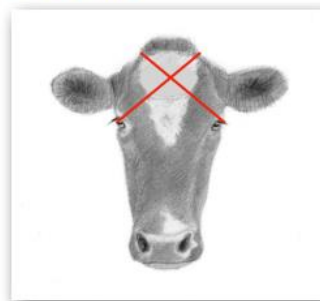
### Captive Bolt Stunning Placement Figures

The "X" intersection on the forehead indicates the proper placement position.

Beef Cattle



Dairy Cattle



- b. **American Veterinary Medical Association (AVMA):**  
<https://www.avma.org/sites/default/files/2024-09/Humane-Slaughter-Guidelines-2024.pdf>  
"Anatomic landmarks for use of the penetrating captive bolt and gunshot—In bovines, the point of entry of the projectile should be at the intersection of two imaginary lines, each drawn from the outside corner of the eye to the center of the base of the opposite horn (Figure 4). Alternatively, in long-faced cattle or young-stock, a point on the midline

#### Entities:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

of the forehead that is halfway between the top of the poll and an imaginary line connecting the outside corners of the eyes can be used (Figure 5)."

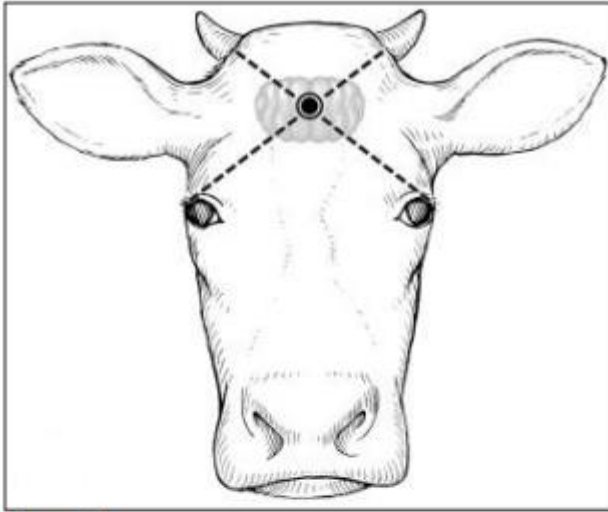


Figure 4

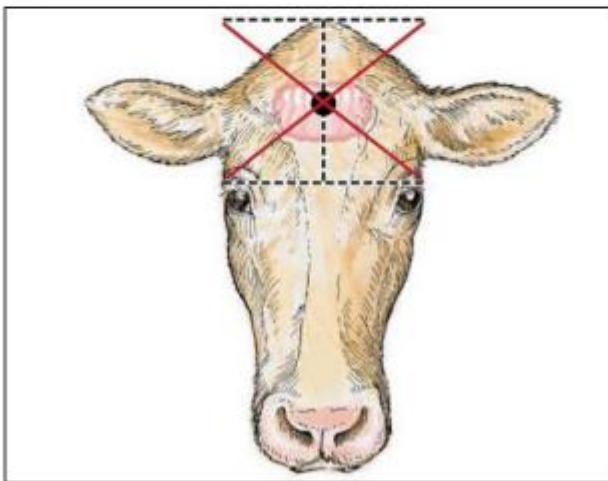


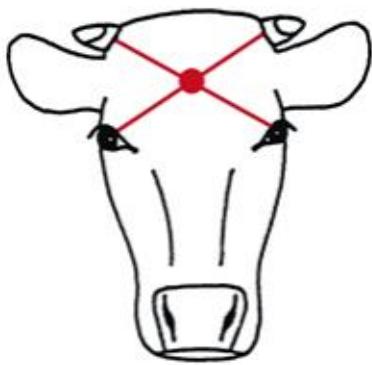
Figure 5

- c. **U.S. Department of Agriculture:** [https://www.fsis.usda.gov/sites/default/files/media\\_file/2021-07/2016-Humane-Slaughter-Association-Captive-bolt-stunning.pdf](https://www.fsis.usda.gov/sites/default/files/media_file/2021-07/2016-Humane-Slaughter-Association-Captive-bolt-stunning.pdf)

"Positioning captive-bolt equipment correctly is essential in order to deliver an effective stun. Incorrect positioning, resulting in an ineffective stun, will cause the animal to suffer pain and distress.

#### Penetrative Captive-bolt

In cattle, the brain is situated high in the head. The ideal stunning position is in the middle of the forehead—at the crossing point of two imaginary lines drawn between the eyes and the centre of the base of the opposite horns (Figure 7a). This should give a position about 70mm,  $\pm 10$ mm, above a line drawn across the forehead at the back of the eyes. The muzzle of the stunner should be held at a right angle to the skull, so that the bolt is directed through the upper brain towards the brainstem (Figure 7b)."



**Figure 7a: Stunning position - Penetrative**



**Figure 7b: Cross-section**

2. Cattle in the holding area, loading chute, and stunning pen could see the slaughter and dismemberment of other animals. This violates best practices and guidelines put forth by the AVMA, which state, “These Guidelines are concerned with minimizing animal distress, including negative affective or experientially based states such as fear, aversion, anxiety, and apprehension, during the slaughter process.” The AVMA further states, “Block animal’s vision of ... activity on the floor. ... [A]nimals entering the [stunning area restraint] device should not be able to see ... activity on the processing floor.”
  - a. Our recommendations are:
    - i. Close the door between the holding area and the kill floor to block the sight of slaughter and processing and to mitigate the noise of kill floor saws and machinery.
    - ii. Block the view of the stunning pen from the holding area so that the waiting cattle cannot see animals being shot with the captive-bolt gun.
    - iii. Increase the height of the panel between the side of the stunning pen and the kill floor so that cattle cannot see processing activities over the top of the panel.
    - iv. Create a partition between the butchering areas and the stunning pen so that cattle standing in the pen cannot see through the front of the pen to witness other animals’ bodies being dismembered.
    - v. Do not load cattle into the pen until the slaughterer is ready for stunning. During PETA’s investigation, one cow was kept in the stunning pen for over nine minutes, during which time she could see, hear, and smell the butchering of other cows. NAMI guidelines specify, “Cattle should be stunned immediately after they enter a stun box or restrainer.” ([https://www.meatinstitute.org/sites/default/files/original%20documents/Animal\\_Handling\\_Guide\\_English.pdf](https://www.meatinstitute.org/sites/default/files/original%20documents/Animal_Handling_Guide_English.pdf))

I can be reached at [REDACTED]. I hope to hear from you soon.

Sincerely,

Daniel Paden  
Vice President of Legal Advocacy  
Cruelty Investigations Department