

**Food Safety and Inspection Service Memorandums of Interview at Bachoco OK Foods
Slaughterhouse in Heavener, Oklahoma**

Establishment Number	Establishment Name	Inspection Date	MOI Description
P165H	OK Foods, Inc.	1/17/2020	On the afternoon/evening of 1-15-20 birds were caught and brought to the plant from Hannah Farm located in Waldron, Arkansas. The earliest load arrived at 1747. Due to water related issues, the establishment did not slaughter on the evening of 1-15-20 and did not resume normal operations until approximately 0715 on 1-17-20. These same birds are still on site and have been without food or water for an extended period of time (approximately 37 hours). The establishment's Animal Welfare Plan contains the National Chicken Council Animal Welfare Guidelines and Audit Checklist for Broilers. Page 11 of the plan states "Feed withdrawal must not exceed 18 hours prior to slaughter". Page 14 of the plan states "Holding times of live birds at the plant must be kept to the minimum consistent with good processing practices, with the maximum time from catching to slaughter recommended to not exceed 12 hours". Both of these timeframes were exceeded. On the morning of 1-17-20, I met with Mr. (b)(6) Harwell, Assistant Plant Manager and discussed my concerns over the length of time these birds were kept on-site without food or water. Mr. Harwell understood my concerns and explained that the plant had requested that OK Farms live haul division return the birds to a farm on 1-16-20. However, this did not occur.

P165H	OK Foods, Inc.	3/30/2020	At approximately 0641 on Monday, (b)(6) 30, 2020 while performing an ante-mortem examination on the back dock, I observed the following. An employee was removing birds from a cage and placing them in a shackle attached to a scale in order to obtain individual live bird weights. The employee then removed the birds from the shackle by the hocks and threw them in a side arm motion back into the cage. During this time, the back dock supervisor was standing approximately 6-8 feet away recording the individual bird weights. After observing the employee weight approximately four birds and return each by throwing them side arm back into the cage with no action from plant management, I proceeded to the cage dumper operator and asked him to stop dumping cages. U.S. reject tag B45009892 was attached to the cage dumper a short time later. I discussed my observations and concerns with (b)(6) (b)(6). (b)(6) (b)(6) commented that she had not seen the employee throwing the birds back into the cage. I then phoned (b)(6) (b)(6) to apprise her of the situation. At approximately 0720 I met with Mr. Danny Houston, Plant Manager; Mr. (b)(6) (b)(6) (b)(6) (b)(6) and (b)(6) (b)(6) (b)(6) to discuss my findings and the plant's plan of corrective action. (b)(6) has stopped the practice of weighing live birds. Mr. (b)(6) suspended the employee involved in the incident from handling live poultry until further notice pending involvement from the human resources department. (b)(6) conducted employee training with the remaining employees who handle live poultry by reviewing bird handling expectations. Additionally, (b)(6) met with the two back dock leads and the back dock supervisor to communicate his expectations regarding their monitoring employees handling of live birds. Following the completion of these training events, I released regulatory control of the cage dumper at approximately 0803. A conference call with plant management, Dr. Daily and (b)(6) scheduled for 0900 on 3-31-20.
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P165H	OK Foods, Inc.	1/7/2022	At approximately 0551 on 1/7/22, while performing a good commercial practice check, I REDACTED) observed a small sensible bird (eyes open, head up, held close to the back) proceeding down the line and into the line 1 scalders. I traveled down the line and observed a cadaver exit the pickers. I removed the cadaver from the line and examined it. There was no cut on the neck. REDACTED, REDACTED was notified of my observation and shown the cadaver. The incident was discussed a short time later (approximately 0608) in the supervisor's office with REDACTED. REDACTED explained that after she was shown the cadaver, a different plant employee was placed on line 1 monitoring for sensible carcasses. The employee who had been working at that location during the time of my observation was disciplined according to company policy. Later in the shift I performed a recheck and observed zero sensible birds prior to the scalders.
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P165H	OK Foods, Inc.	2/26/2022	At approximately 0909 on Saturday, February 26, 2022, while in the picking room performing a GCP check, I (REDACTED. REDACTED) noticed that the line 2 kill line was not moving. During the performance of my various checks on line 1, I noticed that the line 2 stunner tank had not been lowered. I turned the lights on in the blood tunnel room and observed that birds were in the shackles inside the line 2 stunner. The normal procedure is for the stunner tank to be lowered several inches when the kill line stops. This allows the heads of the birds to be out of the water that is normally in the bottom of the tank. However, at the time of my observation, the heads of the birds in the stunner were submerged in water. At approximately 0921 a REDACTED came into the blood tunnel room and lowered the line 2 stunner tank. I turned the lights on again and observed that 21 birds had expired due to drowning. I discussed this incident at the weekly meeting with plant management at 10:00. Additionally, I met with REDACTED. REDACTED, REDACTED at approximately 1023, explained what I had observed and notified him of the forthcoming MOI. REDACTED. REDACTED explained that he had been away from the production floor working on a live haul issue when the line stopped. Additionally, one REDACTED was on break and the other was working outside during the time that the line was down.
P165H	OK Foods, Inc.	27-May-22	On calendar date 5/27/2022 at approximately 1600 hours, I, REDACTED REDACTED while

			performing a good commercial practice check observed one live bird in the DOA dumpster outside of the live hanging room. The bird was laying on top of DOAs and had a rhythmic in and out motion of the bird's abdomen as it breathed. I immediately requested the REDACTED, REDACTED to my location in the absence of REDACTED REDACTED. Upon his arrival, I showed REDACTED REDACTED the live bird in the dumpster and notified him of the forthcoming MOI. A plant employee removed the live bird and the bird tried to upright itself. After being removed from the dumpster, the bird was dispatched by cervical disarticulation. Past practice at this facility is for all birds to receive cervical disarticulation prior to being placed in the DOA dumpster. The establishment's Animal Welfare Program states REDACTED REDACTED REDACTED stated that the typical employee for performing such tasks was not at the facility this evening.
P165H	Bachoco OK Food	7-Feb-23	At approximately 1549 on 2/7/22 [sic], while performing a good commercial practice check, I (Dr. REDACTED) observed a small sensible bird (eyes open, head up, held close to the back) proceeding down the line and into the line 2 scalders. I immediately motioned to Mr. REDACTED, Back Dock Supervisor and we traveled down the line and observed a cadaver exit the scalders. The lead person removed the cadaver from the line, and we all examined it. There was no cut on the neck and the carcass was a bright cherry red. I explained to Mr. REDACTED that we would discuss the finding in the

			supervisor's office after I finished the rest of my checks. The incident was discussed a short time later with Mr. REDACTED in the supervisor's office at approximately 1604. I explained that the rest of my checks indicated no equipment related issues with the stunner or kill machine. I explained that the finding and our discussion would be documented in MOI. Shortly after that meeting, Mr. REDACTED, Evisceration Superintendent notified me that the employee responsible was relieved of his duties until additional training can be provided. Later in the shift I performed a recheck and observed zero sensible birds prior to the scalding.
P165H	Bachoco OK Foods	28-Sep-23	At approximately 1532 on Thursday, September 28, 2023, while performing a good commercial practice check in the live hang room I (Dr. REDACTED) observed the following. An employee hanging live chickens on line 2 was repeatedly using excessive force to hang the birds in the metal shackles. The employee was using a rapid downward motion, slamming the bird's legs into the leg loops of the shackles. After observing this same forceful technique used on approximately 3 birds, I looked to my left to get the attention of Mr. REDACTED, Back Dock Supervisor and pointed to the employee as he was in the process of using excessive force to hang another bird. Mr. REDACTED immediately removed the employee from the live hang room and notified me that the employee was sent to HR. Mr. REDACTED was notified of the improper live bird handling technique and the forthcoming

			MOI. Shortly thereafter, I met with Mr. REDACTED, Mr. REDACTED, Evisceration Superintendent and Mr. REDACTED, Plant Manager. I explained my observations of excessive force, Mr. REDACTED actions and my plans to document my observations in an MOI. I explained that I would include any corrective actions that the establishment wanted to share in the MOI. Mr. REDACTED commented that the plant would respond to the MOI in PHIS. I asked if there were any questions, but management had none at that time.
P165H	Bachoco OK Foods	10/2/2023	At approximately 1308 on 10/2/23, while performing a good commercial practice check, I (Dr. REDACTED) observed a small sensible bird (eyes open, head up, held close to the back) proceeding down the line and into the line 1 scalders. I immediately traveled down the line and observed a cadaver exit the pickers. I removed the cadaver from the line and examined it. There was no cut on the neck and the carcass was a bright cherry red. I showed the carcass to Mrs. REDACTED and explained that we would discuss the finding in the supervisor's office after I finished the rest of my checks. The incident was discussed later with Mrs. REDACTED and Mrs. REDACTED, Evisceration Supervisor in the supervisor's office at approximately 1402. I explained that the finding and our discussion would be documented in MOI. Mrs. REDACTED notified me that the employee responsible would face disciplinary action.
P165H	Bachoco OK Foods	1/20/2024	Following the installation of new evisceration equipment on January 20, 2024, at

		approximately 1030 CSI REDACTED was informed by Ms. REDACTED, 2nd Processing Superintendent, they were planning on running live test birds around 1200. USDA checked on the birds at 12pm, the birds appeared to be resting in comfort, not crowded, heaters on, with 4 DOA's being observed. The time was then delayed till 1300. At approximately 1330, the trailer of birds was brought to the unloading station. At approximately 1445 I was in Mrs. REDACTED office discussing if the live birds were going to be ran on the lines. While discussing the issue, Mr. REDACTED, Assistant Plant Manager, and Mr. REDACTED, VP of Operations, entered. We were all informed at that time they were not going to test-run the live birds and they would be returned to the farm in Keota. USDA told management that it was their choice. At approximately 1515 CSI REDACTED and Mr. REDACTED were informed that the birds had been caught the previous night at approximately 2000 hours and were approaching the 18hr mark of no food or water and that due to the cold conditions, there were numerous dead-on arrivals (DOA's) on the trailer. The outside temperature stayed in the low to mid 20's throughout the day. Mr. REDACTED then informed USDA that the birds would be euthanized or transported back to the farm. It is noted that there was no driver on premises and the farm was approximately 2hrs away. Mr. REDACTED and Mr. REDACTED were both verbally informed this incident would be documented in an MOI.
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P165H	Bachoco OK Foods	3/11/2024	On calendar date 3/11/2024 at approximately 1710 hours, while performing a routine GCP task at pre-scald I witnessed a young poultry pass by the mechanical backup head puller with its neck and head tucked into its breast area. As it entered the scald tank I followed it through the process from pre-scald where I made the first observation to after the picker where it came from the pickers in a manner that coincided with that of a cadaver, bright red in color and the head still attached. After removing said bird from the shackle I further examined it and found that there were no cuts to the neck to allow proper bleeding. At this time, Back Dock Supervisor, REDACTED arrived, and I showed him my findings and informed him I would be documenting a GCP MOI.
P165H	Bachoco OK Foods	3/27/2024	At approximately 0910 on the morning of 3/27/24 while performing a GCP task at the cage dumper area, I (Dr. REDACTED) observed the following. A forklift driver removed a cage containing live birds with an open door from the live haul trailer. As the driver backed up and turned, I observed a bird resting on the cage door. As the driver moved forward towards the cage dumper, he began lowering the cage, however, the bird that was on the door fell to the ground from a height of approximately 5-6 feet. At this point, the driver stopped the lift, lowered the cage, picked up the bird and placed it back into the cage. At approximately 0923, I met with Mrs. REDACTED, Back Dock Supervisor and described my observations. Additionally, I explained that in the past, I had observed lift

			drivers removing cages with open doors from the trailer and immediately lowering the cage to the ground until the door was shut, thereby preventing birds from falling to the ground. Mrs. REDACTED appeared to understand my concern and commented that she would talk to the forklift driver.
P165H	Bachoco OK Foods	8/21/2024	At approximately 0743 am on Wednesday, August 21, 2024, while performing a good commercial practice check in the live hang room I observed the following. The first or initial live hanger was repeatedly using excessive force to hang the birds in the metal shackles. The employee was using a rapid downward motion while placing the bird's legs into the leg loops of the shackles. After observing this same forceful technique used on several birds, I determined that a GCP MOI was warranted. Shortly thereafter, I met with Mrs. REDACTED Back Dock Supervisor notifying her of the improper live hang technique and the forthcoming MOI. As a corrective action, the establishment relocated this employee to a different position where he will not be working with live poultry.
P165H	Bachoco OK Foods	9/4/2024	On calendar date Wednesday, 9/4/2024, at 1939 hours while performing a good commercial practice check in the live hang room I observed the following. When I arrived, there was a live young poultry trapped on the back side of the live hang table/belt underneath a bracing that is attached to said table and could not free itself. At this time, I determined that a GCP MOI was warranted. Shortly thereafter, I met with REDACTED Back Dock Supervisor, notifying Mr.

			REDACTED of the live poultry trapped underneath the bracing and of the forthcoming MOI. As an immediate corrective action Mr. REDACTED had the young poultry removed from underneath the bracing. This has been a past area of concern, with the forementioned being discussed in two weekly exit conferences. The first exit conference was held on Friday, 8/9/2024 with a comment from plant management of it was being looked into for ways that would eliminate this from happening. The second exit conference was held on Friday, 8/23/2024 with a comment from plant management, Maintenance Supervisor REDACTED stating that he had 3rd shift maintenance personnel look into this but was unaware of the outcome, and Evisceration Superintendent REDACTED stating that he has instructed employees to look for such instances and remove the poultry promptly. During the meeting on 9/4/2024 at 2015 hours, Mr. REDACTED stated that he was unaware of the conversations held during the weekly exit conferences but would now be more vigilant in looking for these happenings
P165H	Bachoco OK Foods	12/30/2024	On 12-30-24 at approximately 0917 while performing a good commercial practice check, I (Dr. REDACTED) observed one live bird in the DOA (dead on arrival) dumpster outside the live hanging room. The live bird was partially covered by a DOA. I observed a rhythmic in and out motion of the bird's abdomen as it breathed. I immediately notified Mrs. REDACTED, Back-Dock Supervisor of the live bird in the dumpster and notified her that a GCP MOI would be issued. A plant employee removed the live

			bird from the dumpster and performed a cervical disarticulation before placing it into a condemn barrel. The establishment's Animal Welfare Program, SOP for DOA and Euthanasia states "DOAs must be decapitated prior to placement in the DOA bin". Mrs. REDACTED came to the USDA office later in the day and presented documentation showing that she had performed animal welfare training with four plant employees. The training material included instructions stating "The head must be removed from the carcass prior to disposal in the DOA bin."
P165H	Bachoco OK Foods	7/31/2025	At approximately 1218 on Thursday, July 31, 2025, while performing a good commercial practice check in the live hang room I observed the following. One of the hangers was repeatedly using excessive force to hang the live birds in the metal shackles. The employee was using a rapid downward motion while placing the bird's legs into the leg loops of the shackles. After observing this same forceful technique used on several birds, I determined that a GCP MOI was warranted. Mr. REDACTED, Evisceration Superintendent, was notified of the forthcoming MOI and was shown the employee responsible. I met with Mr. REDACTED again at approximately 1315 in the supervisor's office to further discuss my observation in a quieter environment. Mr. REDACTED explained that he would be providing additional training to the employee. A similar finding of excessive force was documented in GCP MOI DAF09170610301 dated 6/30/25.

**Food Safety and Inspection Service Memorandums of Interview at Bachoco OK Foods
Slaughterhouse in Fort Smith, Arkansas**

Establishment Number	Establishment Name	Inspection Date	MOI Description
P165S+V165S	OK Foods, Inc.	8/2/2021	From: REDACTED Subject: Good Commercial Practices Meeting Date: 08-02-2021 Meeting Time: 1020 hours Establishment: P-165S Attending: REDACTED. REDACTED USDA FSIS Attendees: REDACTED, REDACTED This MOI is to document my conversation with REDACTED in his office today, August 2, 2021 at 1020 hours. I told REDACTED. REDACTED that during my Good Commercial task today I observed a metal shield had been placed over the dumper belt, which made it impossible to observe whether or not cages of birds were being dumped on top of other birds on the belt. I also told him of my observation of the mirror that was previously used by the dumper control employee was now sitting on the ground away from the dumper belt. I went on to say that my concern was that USDA could not inspect the area, due to the only other route to inspect the area would be through the forklift safety area. REDACTED. REDACTED stated that the shield had been put in place to blacken the area out and that he would have to get with REDACTED to find a way for us to inspect the area. I told REDACTED. REDACTED that due to this establishment not having prior issues of over-dumping the birds that it was not an immediate concern, but was still necessary for us to inspect the area. I then thanked REDACTED. REDACTED for his time.
P165S+V165S	OK Foods, Inc.	8/3/2021	From: REDACTED Subject: Good Commercial Practices

			Meeting Date: 8-3-2021 Meeting Time: 05:23- 05:30 Meeting Locations: Outside by Dumper Belt, Evisceration Department Establishment: P-165S Attending: 00165S P Attendees: Superintendent REDACTED, REDACTED USDA FSIS Attendees: REDACTED, REDACTED This MOI is to document my conversations today, August 3, 2021 with REDACTED, REDACTED, and REDACTED, Superintendent while performing the Good Commercial task. At 0523 hours I told REDACTED. REDACTED that I had observed employees picking up live birds by the trucks and then followed through by observing the cage on the roller belts. I showed him that one of the cages on the belt did not have a door, exposing the birds. I asked if this was a common practice. He stated that it was. I then asked if the birds ever fell out onto the roller belt, which could lead to being rolled over. He stated that they do fall out sometimes. I told REDACTED. REDACTED that this was not a good practice. At 0530 hours I told REDACTED. REDACTED of my observations and conversation with REDACTED. REDACTED. REDACTED. REDACTED stated that he would get with the Live Hang employees and "change things to make sure that they put them into cages with doors from now on." I thanked REDACTED. REDACTED for his time.
P165S+V165S	OK Foods, Inc.	8-Nov-22	This MOI is to document my conversation with REDACTED REDACTED at approximately 0528 hours in the Evisceration department by the Rehang area. I conveyed the following concerns of my observations during performing a GCP task:

			In the Live Hang area, I observed an employee picking up live birds by the wing and throwing them up the moving conveyor belt. I showed the employee to the available employee in the Live Hang office at the time, asking for the REDACTED. I was told that the Supervisor was unavailable until Thursday. I then continued outside to speak with the REDACTED employee of my concerns. The REDACTED employee stated that he would take care of it. At the end of our conversation, REDACTED REDACTED stated that he would make sure it was taken care of.
P165S+V165S	Bachoco OK Foods	12/3/2024	On the afternoon of Tuesday 12-3-24, I (CSI REDACTED) was performing a routine schedule Poultry Good Commercial Practices (GCP) check at approximately 1648 hours at the dumper area of live hang when I observed the following events. After the dumping of a cage onto a transfer belt for live hang, I observed the cage being moved to the return mechanism; soon after, one of the two employees at the dumper walked over and kicked a live chicken that was still on the platform onto the transfer belt. I continued to observe additional cages being dumped upon which time the employees noticed me standing on the catwalk. At that time, one of the employees elected to handle a different chicken with his hand and toss it onto the belt. I continued into the live hang office where I explained my egregious observations to Supervisor REDACTED and notified her of the forthcoming MOI for the GCP violation. SCSi REDACTED and Springdale District DVMO REDACTED were notified via email.

P165S+V165S	Bachoco OK Foods	8/4/2025	At approximately 2132 hours on the evening of Monday August 4, 2025, I, CSI REDACTED, was performing a routine Poultry GCP check in the live hang area of P165S when I had the following concerns. While observing hanging operations from the live hang office, I noticed line 1 had been down for a few minutes. I asked present Live Hang Supervisor REDACTED how long the line had been down to which she mentioned that it had been down since approximately 2129 hours due to chiller 1 being down. I returned to the USDA office at approximately 2137 hours, donned my smock and other PPE, and headed to the kill room. Upon arriving at approximately 2140 hours, I noticed line 1 kill line still down and all the birds post-stunner were bled out via throat cut. I stayed in the area for a significant amount of time, noting no member of management or other plant personnel taking action(s) to address the birds in the scalders. At approximately 2152 hours, I travelled into the evisceration department and briefly spoke to Supervisor REDACTED and stated I needed a member of management in the kill room. Soon after, Night Shift Manager REDACTED was near the handwash sink and I requested his presence in the kill room. Upon his arrival at approximately 2154, I asked Mr. REDACTED if the establishment had taken measures to ensure the birds in the stunner did not die by means other than slaughter and I pointed towards the stunner. Mr. REDACTED instructed an employee to remove birds from the stunner. At approximately 2155 hours, I observed as a kill room employee began removing birds. The employee removed approximately 19 birds
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		from the stunner that were dripping wet from approximately mid-breast and down. The birds had no signs of life, had not been cut and bled out, and the paws were stiff in a twisted manner. Per the provided information and witnessed events, the birds hung in the stunner water for approximately 26 minutes, causing the birds to drown. Upon the removal of all deceased birds from the stunner, I immediately went to the USDA office and spoke to SCSi REDACTED via phone at approximately 2004 hours and notified him of the situation. I explained my concerns that the establishment allowed birds to die by means other than routine slaughter. SCSi REDACTED agreed that the incident is concerning and warrants an MOI. Due to continued issues with the chiller, I was unable to follow up with Mr. REDACTED for further information. This MOI is being documented per supervisory instruction due to GCP related concerns. The information provided is true and accurate to the best of my knowledge.
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