

Exhibit 26

Salmonella in Horses: a Source of Contamination of Horsemeat in a Packing Plant Under Federal Inspection

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Cecal samples from 270 slaughter horses revealed that 41 samples (15.1%) contained *Salmonella*. Of 233 horsemeat samples tested, *Salmonella* was isolated from 62 samples, or 26.6%. Only 2 of 158 human stool specimens from the plant workers revealed *Salmonella*. Predominant serotypes isolated from the horsemeat were *Salmonella enteritidis* Good and Anatum, whereas the serotypes Agona and Derby predominated the horse cecal isolates. Preliminary data indicate that the high percentage of meat contamination is surface contamination due to poor slaughtering technique.

Very little information is found in the literature concerning the incidence of *Salmonella* in horses. Prost and Riemann (12) discussed the incidence of *Salmonella* in slaughter horses and indicated that the occurrence is low. However, Meara (7) recently reviewed this topic and showed with meat imported into the United Kingdom that 42% of horsemeat samples and 50% of horse offal samples were contaminated with *Salmonella*. Horsemeat from South America imported into Holland showed 15% *Salmonella* contamination to carcass meat and 57% *Salmonella* contamination in boneless meat. Schothorst and Kampelmacher (14) have shown that in meat imported from South American countries into European countries, *Salmonellae* were isolated from 278 of 800 samples (34.7%) of frozen carcass or boneless horsemeat.

Salmonella contamination in fresh meat from horses is an international problem. People in this country do not consume a relatively large amount of this product, but there are approximately a dozen horsemeat-packing firms operating in this country. The plants are producing fresh meat, both whole carcasses and boneless, to be exported fresh and frozen into foreign countries for human consumption. The purpose of this communication is to discuss our findings during a 1-year study in one of these plants.

MATERIALS AND METHODS

Between October 1974 and August 1975, 270 horse cecal samples, 158 human stool samples, and 233 horsemeat samples were obtained as random samples from a horsemeat-packing plant near the university campus. Buffered glycerol saline transport medium (BBL) was used to transport the stool specimens. No transport medium was added to the meat

samples, but the isolation procedure for meat was begun the day the samples were obtained.

The methodology of *Salmonella* isolation is well documented (1, 9), and the techniques described in the United States Department of Agriculture's *Microbiology Laboratory Guidebook* (1) were used for meat analysis. The Texas State Department of Health procedure, which was originally described by Edwards and Ewing (5a), was used for human and horse stool analysis.

Meat sampling. Meat surfaces were sampled with sterile or alcohol-sanitized knives. Typically, whole carcasses were sampled on the forequarter or foreleg. Boneless meat was most commonly taken from open boxes in the boning room. Meat samples were placed in sterile jars, capped, and transported to the laboratory. The testing procedure was begun on the same day as sampling. A 25-g sample of meat was obtained by using a sterile technique. This 25-g quantity was placed into sterile blender jars with 250 ml of sterile lactose broth and 1.5 ml of Tergitol 7 (Sigma Chemical Co.). Blending proceeded for 2 min. The pre-enrichment incubation was performed overnight at 35 C in the blender jars. Enrichment, isolation, and biochemical identification strictly followed the *Microbiology Laboratory Guidebook* (1).

RESULTS AND DISCUSSION

The value of serotype distribution in the genus *Salmonella* is a widely recognized and used epidemiological tool. During an 11-month period, extending from October 1974 through August 1975, experiments were conducted in a horsemeat-packing plant to study the distribution of *Salmonella* serotypes in the plant. This survey concerned only those isolations from horsemeat, the horse cecum, and stools of plant personnel. A total of 14 serotypes were isolated (Table 1). Two serotypes, Agona and Anatum, were encountered in all three places of isolation. The horse cecum proved to be a prominent

place for isolating *Salmonella*, with eight serotypes isolated from it. Table 2 depicts these eight serotypes with frequency of isolation and percentage of total horse cecal isolates. The serotypes Agona and Derby were the most commonly encountered serotypes, being found 17 and 10 times, respectively, in 270 horse cecal samples. Two serotypes, Montevideo and Siegburg, were isolated exclusively from the cecum; however, each of these serotypes was isolated only once.

Horsemeat showed the most contamination, with a total of 12 serotypes isolated from it. Table 3 shows the frequency of isolation of these 12 serotypes and the percentage of total meat isolations. The serotypes Good and Anatum proved to be the most commonly encountered serotypes in the meat, being found 19 and 18 times, respectively, out of 233 horsemeat samples. Six of the serotypes in horsemeat were found exclusively as meat contaminants; however, five of these were found only once.

The serotype St. Paul proved to be an interesting case. It was isolated eight times for a frequency of 12.9% in horsemeat only; it never was detected in the horse cecum. By categoriz-

ing all the serological types taken from meat into areas of isolation in the abattoir (Table 4), it can be seen that the serotype St. Paul was isolated from samples of boned meat taken from the boning room. This perhaps could suggest other sources of contamination besides horse feces.

In preliminary experiments involving 18 intact carcasses, contamination appeared only on surface samples and never in deep muscle samples. Six carcasses showed surface contamination, but no subsurface sample revealed *Salmonella*. Questions have been posed in the literature (12) concerning the possibility of a carrier animal's tissues being contaminated with *Salmonella*. Schothorst and Kampelmacher (14)

TABLE 1. *Salmonella* serotypes isolated from horsemeat, horse ceca, and plant employees

Serotype	Place of isolation		
	Horsemeat	Horse cecum	Human stool
Agona	x	x	x
Anatum	x	x	x
Derby	x	x	
Good	x	x	
Paratyphi B	x	x	
Newport	x	x	
Montevideo		x	
Siegburg		x	
St. Paul	x		
Drypool	x		
Oranienberg	x		
Alabama	x		
Heidelberg	x		
San Diego	x		

TABLE 2. *Salmonella* serotypes isolated from the horse cecum

Serotype	Isolation frequency	% of total horse cecal isolates
Agona	17	41.5
Derby	10	24.4
Anatum	5	12.2
Good	3	7.3
Paratyphi B	2	4.9
Newport	2	4.9
Montevideo	1	2.4
Siegburg	1	2.4

TABLE 3. *Salmonella* serotypes isolated from horsemeat

Serotype	Frequency	% of total meat isolation
Good	19	30.6
Anatum	18	29
St. Paul	8	12.9
Drypool	4	6.5
Newport	3	4.8
Oranienberg	3	4.8
Agona	2	3.2
Alabama	1	1.6
Derby	1	1.6
Paratyphi B	1	1.6
Heidelberg	1	1.6
San Diego	1	1.6

TABLE 4. *Salmonella* serotypes encountered in horsemeat in different areas of the abattoir

Boning room (boned meat)		Kill floor		Hanging room (carcass meat)	
Serotype	Frequency	Serotype	Frequency	Serotype	Frequency
Anatum	7	Good	7	Anatum	8
Good	5	Anatum	3	Good	7
St. Paul	5	St. Paul	2	Drypool	2
Newport	3	Drypool	1	San Diego	1
Oranienberg	2	Oranienberg	1	Heidelberg	1
Drypool	1	Agona	1	Paratyphi B	1
Derby	1			St. Paul	1
				Alabama	1
				Agona	1

have stated that external contamination is much more common than internal contamination.

A large number of serotypes were found both in the horse cecum and in horsemeat (Table 1). This supports the idea that a major source of meat contamination is horse feces. However, no explanation can be given for the large variation in the isolation frequency of certain serotypes from meat and the horse cecum. Both samplings were random, and no carcasses were sampled for both cecal and meat isolations.

The distribution of *Salmonella* in the environment has been the subject of research effort in recent times. Cherry et al. (2) have suggested the use of *Salmonellae* as an index of surface water pollution. Environmental contamination should be a common concern of all meat-processing firms. Conversely, a number of researchers (3, 6, 13) have shown the significance of packing plant runoff as a source of environmental contamination.

In a study involving an ecological survey of a freshwater lake, Cook et al. (4) reported the isolation of *Salmonella enteritidis* serotype Agona, a newly emerging serotype, from a freshwater lake that received poultry processing wastes. In 1973 the serotype Agona was the seventh most common human *Salmonella* isolate at the Center for Disease Control; consequently, the authors described it as an emerging serotype. They linked the worldwide emergence of this serotype to the need for and wide use of fish meal in animal feeds. Crumrine et al. (5) have even shown that during storage, grain insects are involved in *Salmonella montevideo* transmission in wheat.

No extensive data have been compiled on the *Salmonella* serotypes isolated from given animal species. Morse and Duncan (8), however, give an adaptation of a table from the work of W. H. Ewing describing the ecological divisions of *Salmonella*. Three groups are included: I, II, and III. Group I are serotypes more or less adapted to man, group II are animal-adapted serotypes, and group III are unadapted serotypes. It would be very valuable indeed to have data relating different serological types to different animal species. The serotype Typhimurium appears to be an important horse pathogen (8, 10, 11); however, other serotypes have been shown in horses and have produced disease (8, 11). Of the 23 serotypes reported to have been isolated from horsemeat by Schothorst and Kampelmacher (14), our investigation revealed 9 of the same serotypes, with a striking similarity in the most frequently isolated serotypes.

Concerning this research, it must be pointed out that slaughter animals, especially horses, are a special case. Slaughter horses have usually been trucked for extensive distances. Many times they are injured or unhealthy, housed poorly, fed and watered improperly, and sometimes held for long times, as much as a week, in dirty, confined pens at the slaughter plant. Carrying rate for *Salmonella* can become quite great under these circumstances. This becomes a fact with which the meat-processing firm must deal, and stress of slaughter animals, as pointed out by Meara (7), should be minimized.

ACKNOWLEDGMENTS

The technical assistance of Jo Wilson is greatly appreciated. Special thanks is extended to Gloria Pierce of the Texas State Department of Health for serotyping the isolates.

LITERATURE CITED

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Exhibit 27

FROM : HAHS

Apr-22-05 08:46am From:USDA FSIS LHW

PHONE NO. : 8153375569

Aug. 26 2005 04:03PM P5

reporting burden for this collection of information is estimated to average... Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Officer, OIRM, Room 404-W, Washington, DC 20250; and to the Office of Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture
FOOD SAFETY AND INSPECTION SERVICE
NONCOMPLIANCE RECORD

TYPE OF NONCOMPLIANCE

Food Safety Other Consumer Protection

1. DATE

2. RECORD NO.

3. ESTABLISHMENT NO.

04/04/2005

0018-2005-8243

15849 E/I

4. TO (Name and Title)

5. PERSONNEL NOTIFIED

6. RELEVANT REGULATION(S)

313.2(a)&(b), 313.1(b)

7. SECTION/PAGE OF EST. PROCEDURE PLAN

HACCP

SSOP

OTHER

8. ISP CODE

04C02

9. NONCOMPLIANCE CLASSIFICATION INDICATORS

138

PRODUCT - Protocol

10. DESCRIPTION OF NONCOMPLIANCE

At 2:25pm, after supervising the humane stunning and dragging of a horse that flipped over onto its back and was trapped in the alleyway to the stunning area, I remained in the antemortem pens to observe humane handling. I observed the plant manager, [redacted] herding horses into the alley way to the knock box. Nine horses were overcrowded in the alleyway causing undue excitement which was further exacerbated when two more employees from the kill floor began yelling and hitting these horses causing the one in the end of the line to slip and fall. This is a violation of 9 CFR Ch.III regulation 313.2(a) & (b) which state that animals will be handled with a minimum of excitement and discomfort. Also 313.1(b) requires floors to be maintained so as to provide good footing for livestock to prevent slipping and falling. I informed [redacted] of the violation of these regulations and advised him that all employees handling the horses must be trained in how to handle them humanely. Continued failure to comply with regulatory requirements could result in additional or administrative actions.

11. SIGNATURE

[Redacted Signature]

(b)(6) (b)(7)(C)
4/4/05

You are hereby advised of your right to appeal this decision as delineated by 306.3 and/or 381.55 of 9 CFR.

12. PLANT MANAGEMENT RESPONSE (Immediate action(s)):

Management and the Plant Manager will identify specific, trained personnel to carry out the line up of animals to the knock box. These employees will be trained on correct procedures.

13. PLANT MANAGEMENT RESPONSE (Further planned action(s)):

This document serves as written notification that your failure to comply with regulatory requirements could result in additional regulatory or administrative action.

14. SIGNATURE

16. VERIFICATION SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

15. DATE

17. DATE

Exhibit 28

FROM : HAHS

PHONE NO. : 8153375569

Apr-22-05 08:46am From-USDA FSIS CK60

630 620 7599

Aug. 26 2005 04:04PM P5

reporting burden for this collection of information is estimated to average 10 minutes per response, including reviewing the collection of information, sending comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Officer, OIRN, Room 404-W, Washington, DC 20250; and to the Office of Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture
FOOD SAFETY AND INSPECTION SERVICE
NONCOMPLIANCE RECORD

TYPE OF NONCOMPLIANCE

Food Safety Other Consumer Protection

1. DATE: 04/13/2005
 2. RECORD NO.: 0019-2005-8243
 3. ESTABLISHMENT NO.: 15849 E/I
 4. TO (Name and Title): [Redacted] (b)(6)
 5. PERSONNEL NOTIFIED: [Redacted]
 6. RELEVANT REGULATION(S): 313.2 (a) & (b)
 7. SECTION/PAGE OF EST. PROCEDURE PLAN: HACCP | SSOP | OTHER: 138
 8. ISP CODE: 04C02
 9. NONCOMPLIANCE CLASSIFICATION INDICATORS: PRODUCT - Protocol

10. DESCRIPTION OF NONCOMPLIANCE

At 11:20am while performing ante mortem examination, I observed actions that violate Regulation 313.2(a) & (b). Eight horses were in the alleyway leading directly to the knock-box. Only the last stop gate, the one behind the last horse present in the alleyway, was closed. The employee who is routinely assigned to work on the kill floor, hanging the horses on the rails, was using a riding crop to whip the horse in the alleyway closest to the knock-box. This horse continued to move backward, away from the knock-box causing the other horses behind it to be overcrowded. At the whipping continued the horses in the alleyway became extremely excited. I immediately told the employee to stop but he did not listen to me. During this time, the last horse in the alleyway attempted to jump over the alleyway wall and became stuck over the top of the wall. Eventually it had flailed around enough to fall over to the other side of the wall. I went to the kill floor to find the plant manager, could not find him, so I informed [Redacted] in the boosing room, to locate him and send him to the ante mortem pens immediately. Meanwhile two more horses fell down in the alleyway. The first was the second horse in line to the knock-box. It had fallen forward and the horse behind it began to walk on top of it as the downed horse struggled to get up. The second horse to fall was the fourth horse in line. It had flipped over backwards due to the overcrowding and was subsequently trapped and trampled by the fifth and sixth horse in line in their excitement to move forward as the one's closest to the knock-box were finally moved forward. At this time [Redacted] arrived and was informed of the situation.

(b)(6)

11. SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[Redacted Signature] (b)(6) (b)(7) (c) 4/13/05

You are hereby advised of your right to appeal this decision as delineated by 3125.3 and/or 381.35 of 9 CFR.

12. PLANT MANAGEMENT RESPONSE (immediate action(s)):

13. PLANT MANAGEMENT RESPONSE (further planned action(s)):

This document serves as written notification that your failure to comply with regulatory requirements(s) could result in additional regulatory or administrative action.

14. SIGNATURE OF PLANT MANAGEMENT

15. DATE

16. VERIFICATION SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

17. DATE

FROM : HAHS

Apr-22-05 09:46am From-USDA FSIS CHGO

PHONE NO. : 8153375569

620 620 7599

Aug. 26 2005 04:04PM P7
17513 P.000/000 1400

FOOD SAFETY AND INSPECTION SERVICE
NONCOMPLIANCE RECORD CONTINUATION SHEET

Food Safety Other Consumer Protection

1. DATE 04/13/2005	2. RECORD NO. 0019-2005-8243	3. ESTABLISHMENT NO. 15849 E / 1
4. TO (Name and Title) [REDACTED] (b)(6)		5. PERSONNEL NOTIFIED [REDACTED]

6. RELEVANT REGULATION(S)

313.2 (a) &(b)

7. SECTION/PAGE OF EST. PROCEDURE PLAN	HACCP	SSOP	OTHER
			138

8. ISP CODE

04C02

9. NONCOMPLIANCE CLASSIFICATION INDICATORS

PRODUCT - Protocol

10. DESCRIPTION OF NONCOMPLIANCE

He was reminded that the plant's response to the last humane handling NR was to have only appropriately trained individuals handling the horses. The employee who was whipping the initial horse was not one of those trained. Finally I required the second downed horse to be immediately rendered unconscious by a captive bolt stunner and dragged to the knock-box.

Animals are required to be handled with a minimum of excitement and discomfort, and implements employed to move the animals shall be used as little as possible in order to minimize excitement according to 9 CFR Ch. III, regulation 313.2(a) &(b) respectively. A similar violation was noted on NR 18-2005. This document serves as written notification that your failure to comply with regulatory requirements could result in additional regulatory or administrative action.

11. SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[REDACTED SIGNATURE] (b)(6) (b)(7)(C)

FSIS FORM 5400-A (7/98)
Replaces FSIS Form 5400-B (8/97), which may be used until exhausted (7/98)

DISTRIBUTION: Original & 1 Copy to Establishment, 1 Copy to Inspector
Page 2 of 2

Exhibit 29

The request for this information is voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9 CFR 301 and 9 CFR 384. FORM APPROVED OMB No. 0583-0089. OMB DISCLOSURE STATEMENT: Public reporting burden for this collection of information is estimated to average 7 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Officer, OIRM, Room 404-W, Washington, DC 20250; and to the Office of Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture FOOD SAFETY AND INSPECTION SERVICE NONCOMPLIANCE RECORD		TYPE OF NONCOMPLIANCE <input type="checkbox"/> Food Safety <input checked="" type="checkbox"/> Other Consumer Protection	
1. DATE 10/09/2006	2. RECORD NO. 0013-2006-8243	3. ESTABLISHMENT NO. 15849 E / 1	
4. TO (Name and Title) [REDACTED]		5. PERSONNEL NOTIFIED [REDACTED]	
6. RELEVANT REGULATION(S) 313.2			
7. SECTION/PAGE OF EST. PROCEDURE PLAN		HACCP	SSOP
8. ISP CODE 04C02		OTHER Humane Handling	
9. NONCOMPLIANCE CLASSIFICATION PRODUCT - Protocol		[REDACTED] (b)(6), (b)(7)(C)	

10. DESCRIPTION OF NONCOMPLIANCE

At approximately 0745 after conducting the 06D01 procedure, [REDACTED] an animal health technician with APHIS, notified me about a horse that was down on the last truck to enter the establishment's premises. This horse was lying in lateral recumbency in the upper middle compartment of a pot bellied trailer. Other horses within the compartment were trampling the downed horse. FSIS Directive 6900.2 states that once a vehicle carrying livestock enters an official slaughter establishment's premises, the vehicle is considered to be part of that establishment's premises. The animals within that vehicle are to be handled in accordance with 9 CFR 313.2. I took regulatory control of the situation by placing the truck with the downed horse at the front of the line to be off loaded first in order to decrease the pain and suffering of the downed horse. FSIS Directive 6900.1 states that FSIS personnel are to monitor disabled livestock handling procedures carried out by establishment employees to ensure humane handling of disabled livestock from the time that livestock enter the premises of the official establishment until they are humanely slaughtered or disposed. Non-ambulatory disabled livestock are to be handled with a minimum of excitement, pain, injury, or discomfort. I notified Raul Milan, slaughter floor and processing floor supervisor, about the deficiency. The establishment instituted appropriate corrective action. Upon further investigation, I visibly saw two horses down in the middle upper compartment, not just one horse as originally thought. The other horses jammed into this compartment were trampling all over both of the downed horses

11. SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[REDACTED SIGNATURE]

(b)(6), (b)(7)(C)

You are hereby advised of your right to appeal this decision as delineated by 306.5 and/or 381.35 of 9 CFR.

12. PLANT MANAGEMENT RESPONSE (immediate action(s)):

A notice was sent to all buyers (seller to cover) that more care needed to be taken selecting and loading horse for transport to Cavel. For this specific buyer a letter was sent restricting him to using only single deck trailers and sending only horses that can move certainly survive the trip.

13. PLANT MANAGEMENT RESPONSE (further planned action(s)):

otherwise he will be not allowed to be a buyer.

This document serves as written notification that your failure to comply with regulatory requirement(s) could result in additional regulatory or administrative action.

14. SIGNATURE OF PLANT MANAGEMENT

16. VERIFICATION SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[REDACTED SIGNATURE]

15. DATE
10/10/06

17. DATE
10/10/06

(b)(6), (b)(7)(C)

Exhibit 30

The request for this information is voluntary. It is needed to monitor defects found in this inspection system. It is used by FSIS to determine whether establishments are in compliance. 9 CFR 301 and 9 CFR 381. FORM APPROVED OMB No. 0583-0089. OMB DISCLOSURE STATEMENT: Public reporting burden for this collection of information is estimated to average 7 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Department of Agriculture, Clearance Officer, OIRM, Room 404-W, Washington, DC 20250; and to the Office of Information and Regulatory Affairs, Office of Management and Budget.

US Department of Agriculture
FOOD SAFETY AND INSPECTION SERVICE
NONCOMPLIANCE RECORD

TYPE OF NONCOMPLIANCE

Food Safety Other Consumer Protection

1. DATE 01/24/2007	2. RECORD NO. 0006-2007-8243	3. ESTABLISHMENT NO. 15849 E / 1
4. TO (Name and Title) [REDACTED]		5. PERSONNEL NOTIFIED [REDACTED] (b)(6)
6. RELEVANT REGULATION(S) 313.2		
7. SECTION/PAGE OF EST. PROCEDURE PLAN 04C02	HACCP	SSOP OTHER Humane Handling
8. ISP CODE	9. NONCOMPLIANCE CLASSIFICATION INDICATORS PRODUCT - Protocol (b)(6), (b)(7)(c)	
10. DESCRIPTION OF NONCOMPLIANCE		

At approximately 0700 while monitoring slaughter floor activities, [REDACTED], an Animal Health Technician with APHIS, notified me about two horses being down on the second to last truck to enter the establishment's premises. Both horses were down in the same back middle compartment of a horse trailer. One horse was lying in lateral recumbency at the front end of the compartment and the other horse was lying in lateral recumbency at the back end of the compartment. The horse trailer was divided into four compartments with the front and back compartments being smaller than the middle two compartments. The back middle compartment containing both of the downed horses was approximately twelve feet in length. There were ten other horses besides the two downed horses contained in this compartment. I saw the two downed horses being trampled upon by the other horses as well as the front horse being kicked with the hind feet from another horse. FSIS Directive 6900.2 states that once a vehicle carrying livestock enters an official slaughter establishment's premises, the vehicle is considered to be part of that establishment's premises. The animals within that vehicle are to be handled in accordance with 9 CFR 313.2. I took regulatory control action by placing the truck with the downed horses at the front of the line to be off loaded first in order to decrease pain and suffering of the downed horses. When unloading the trailer, increased excitement and confusion, caused more trampling of the downed horses and compounding the problem was the following: there was a step down from the back middle compartment into the back compartment of the trailer in order for

11. SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[REDACTED SIGNATURE] (b)(6), (b)(7)(c)

You are hereby advised of your right to request this decision as determined by 306.2 and/or 381.35 of 9 CFR.

12. PLANT MANAGEMENT RESPONSE (immediate action(s)):

The driver notified [REDACTED] on arrival that two horses were down. The truck was moved to the dock for unloading and was unloaded in an expedient manner. Management investigated the incident. Management cannot control the conditions of horses in transit. There are horse transport regulations that apply to transport of horses to slaughter and USDA, APHIS has inspectors that

13. PLANT MANAGEMENT RESPONSE (further planned action(s)):

(Cont. p. 2)

This document serves as written notification that your failure to comply with regulatory requirement(s) could result in additional regulatory or administrative action.

14. SIGNATURE OF PLANT MANAGEMENT

[REDACTED SIGNATURE]

15. DATE

1/25/07

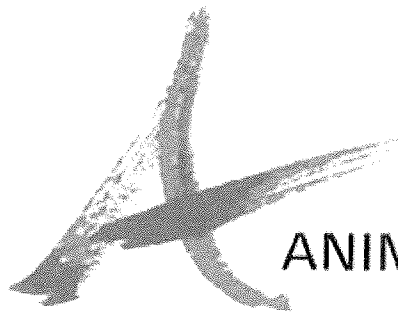
17. DATE

1/26/07

16. SIGNATURE OF INSPECTION PROGRAM EMPLOYEE

[REDACTED SIGNATURE] (b)(6), (b)(7)(c)

Exhibit 31



ANIMALS' ANGELS

we are there with the animals

Press Release
November 2008

Animals' Angels
phone: 410-848-3153
fax: 410-848-0213
www.animals-angels.com

Animals' Angels, an animal welfare organization based in Maryland, last week received over 900 pages of documents and photographs from the United States Department of Agriculture taken during part of 2005 at the Beltex horse slaughter plant in Texas. Documents received 36 months after making a Freedom of Information Act (FOIA) request, reveal an appalling number of incidences and an equally appalling degree of suffering sustained by horses. Evidence indicates alarming cruelty corresponding directly to horse slaughter.



The large FOIA document contains hundreds of photographs that graphically depict horses with open fractures, legs missing, battered and bloody faces, eyeballs dangling and what appears to be horses left to bleed to death. The document provides unimpeachable evidence for the immediate ban on the slaughter of American horses.

The photographs included in the FOIA document were taken between January 17, 2005 and November 17, 2005 at Beltex, the Belgian owned plant in Fort Worth, Texas. Beltex was forced to close this plant in 2007, after courts upheld Texas law that has banned horse slaughter since 1949. Beltex has since focused on its operations in Fresnillo, Mexico where it



continues to slaughter American horses. In addition, Beltex still runs the second largest slaughter horse feedlot in the U.S. Horses from all over the country are transported to the feedlot in Morton, TX before being sent to the Beltex slaughter plant in Mexico.

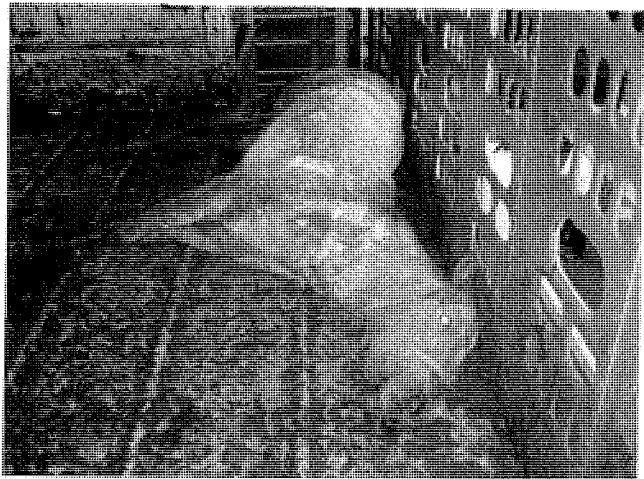
The FOIA request was submitted by Animals' Angels investigator Julie Caramante in November 2005 "I've been an equine cruelty investigator for a number of years," said Caramante, "and I've witnessed many horrific incidents of animal cruelty. But nothing could prepare me for the images contained in the FOIA. These pictures shocked me to the core. The pain and terror these horses endured is criminal. This just should not be, no excuses."

In commenting on the photographs, Sonja Meadows, Executive Director of Animals' Angels USA said:

"The pro-horse slaughter lobby continues to lobby for the domestic slaughter of horses, railing that transportation and slaughter of horses inside the United States is ever so much better, so much more humane than what happens in Mexico. These people say that U.S. humane laws protect the horses, that Mexico has no such laws. But this rhetoric is now exposed as nothing but disingenuous talk. The FOIA reveals unimaginable suffering was being perpetuated upon large numbers of horses on a long-term basis here in the U.S. We can only shudder at the scale of the suffering over the years. Animals' Angels will be investigating what actions were taken against those responsible for this horrific abuse."

Meadows is firm in her support of a Federal ban of horse slaughter. "From our own weekly investigations at auctions, feedlots and slaughter plants, the barbaric and inhumane treatment of horses goes on and will continue to do so until a Federal law is passed to end once and for all, the transportation and slaughter of horses for human consumption. The horse has played such an important part in the history of the United States and continues to be such an integral part in the lives of millions of its citizens. It is well overdue, past time for Congress to act and to pass a law to bring this miserable trade in horses for human consumption to an end."

Animals' Angels continues to send out its investigators to expose the abuse and suffering of horses and to ensure that those responsible within this brutal industry are held accountable for their actions. "However difficult and traumatic these investigations are," said Meadows, "Animals' Angels will remain true to its motto - *'We are there with the animals'*"



[Further information, video and pictures....](#)

Notes to Editors:

1. In 2007, the slaughter of horses on US soil came to an end when a court ruling upheld a Texas law banning horse slaughter, and similar legislation was passed in Illinois. However, failure by the US Senate to pass the American Horse Slaughter Prevention Act into law has resulted in American horses still being slaughtered for human consumption abroad. Tens of thousands are shipped to Mexico and Canada annually, where they are killed under inhumane conditions so their meat can be sent to markets in Belgium, France, Italy and Japan.

Additionally, without the federal law, there remains the threat of horse slaughter plants being established in states that have no laws against the practice. In the beginning of 2008, unsuccessful attempts were made to open a horse slaughter plant in South Dakota. It is likely that pro-horse slaughter organizations will try again elsewhere in the United States. While a handful of horses are purposely sold into slaughter by irresponsible owners, most arrive at the slaughter plant via livestock auction, where unsuspecting owners sell the animals to slaughter

plant middlemen known as "killer buyers". Despite the fact that the US plants are no longer in operation, killer buyers continue to purchase and haul as many horses as possible from livestock auctions around the country to the slaughterhouses that have now relocated to Mexico and Canada.

On the 24th July 2008, the Prevention of Equines Cruelty Act of 2008 (H.R. 6598) was introduced to the 110th Congress by Rep. John Conyers and Representative Dan Burton. H.R. 6598 prohibits the slaughter of horses for human consumption in the United States and the export of slaughter horses to Canada and Mexico.



2. Animals' Angels is a 501 (c)(3) non profit organization incorporated in Maryland with fulltime investigators working in the United States and Canada. Our focus is on improving conditions for farm animals. We work primarily in the field, trailing livestock trucks on highways, visiting markets, collecting stations and slaughterhouses. We seek to cooperate with auction managers, transport companies and other authorities, including the police, veterinarians and the United States Department of Agriculture.

Contact:

Sonja Meadows
Executive Director
Animals' Angels USA
410-848-3153
www.animals-angels.com

Further information, video and pictures can be found here:

[TRANSPORT VIOLATIONS AT BELTEX WARNING - GRAPHIC CONTENT!](#)

Exhibit 32



Mary Nash's Horse Meat Website

Contact webmaster- adminkaufmanzoning.net@hotmail.com

Download Press Release Here - [pressrelease.pdf](#)

WARNING - DOCUMENTS AND VIDEOS
SHOW EXTREME ANIMAL ABUSE

FOIA - LARGE DOCUMENT WARNING
Documents are **Too Large** for browser viewing!!

To Download, right click on link and select
"Save Target As" or "Save Link As" to save.

- [06-108-Records-A.pdf - \(35mb\)](#)
- [06-108-Records-B.pdf - \(165mb\)](#)
- [06-108-Records-C.pdf - \(67mb\)](#)
- [06-108-Records-D.pdf - \(77mb\)](#)
- [06-108-Records-E.pdf - \(50mb\)](#)
- [06-108-Records-F.pdf - \(19mb\)](#)

Videos - FOIA Images on Video

[Windows WMV File \(121 MB\) - Right Click Download Only!!](#)

[Streaming Flash Video \(20MB\) - View In Browser or DL](#)

The 906-page FOIA includes hundreds of separate photographs
of severe and alarming cruelty at the plant during part of 2005.

FDA Case Reports and Court Documents

- [060504_AQ_06-0003.pdf](#)
- [061406_AQ-06-0007_stanley_default_order.pdf](#)
- [Baker081001_AQ_08-0074_dd.pdf](#)
- [BillRichardson061219_AQ_05-0012_Final.pdf](#)
- [BillRichardsonVol65_at_835.pdf](#)
- [BillyRowan080911_AQ_06-0006_do.pdf](#)
- [McBarron070510_AQ_06-0003.pdf](#)
- [Stanley080425_AQ_07-0023_do.pdf](#)
- [Vol62_at_253.pdf](#)
- [Vol65_at_1171.pdf](#)
- [Vol65_at_307.pdf](#)

Read About Those Responsible

Download Press Release Here - [pressrelease.pdf](#)

Additional FOIA Records

Dealers/Livestock Auctions

[Leroy Baker-Sugarcreek](#)

[Frank Bauer and Sons](#)

[G and B Horse Livestock](#)

[Varner Horse Company](#)

[Ricketts Horse Company](#)

[Central Texas Livestock](#)

[Licensed Dealers OH, PA, NY](#)

[New York Licensed Livestock Dealers](#)

[Cattlemen's Auction-Belen, NM](#)

[TX Vet Medical Center \(A&M\)](#)

[TDCJ Ag. Headquarters](#)

[TX Dept. of Criminal Justice](#)

[Landfair Brothers FOIA 487 Part 1](#)

[Landfair Brothers FOIA 482 Part 2](#)

[Landfair Brothers FOIA 486 Part 3](#)

[Landfair Brothers FOIA 486 Part 4](#)

Slaughtered by Breed Type

[Jan 2002-Jan 2004](#)

Humane Slaughter Act Violations

[Cavel](#)

[Bel-Tex](#)

