SHERSTIN L. ROSENBERG, D.V.M.
Happy Hen Animal Sanctuary
[redacted]
[redacted] · sherstin@happyhen.org
California Veterinary License No. 13432

November 16, 2026

VETERINARY EXPERT REPORT
Jennie-O Turkey Store / Hormel Foods Corporation
Turkey grow-out facility at 68651 315th Street, Litchfield, Meeker County, Minnesota

I. Assignment and Summary of Opinions

Counsel has asked me whether the evidence from a Jennie-O Turkey Store ("Jennie-O") turkey farm at 68651 315th Street, Litchfield, Meeker County, Minnesota, establishes the veterinary facts relevant to Minnesota's animal cruelty statute, which defines cruelty as any "act, omission, or neglect which causes or permits unnecessary or unjustifiable pain, suffering, or death" (Minn. Stat. § 343.20, subd. 3).

In my opinion, held to a high degree of veterinary certainty, turkeys at this farm suffered unnecessary and unjustifiable pain through neglect:

- **Pain and suffering:** Birds had large necrotic skin wounds consistent with gangrenous dermatitis, swollen joints, and leg deformities, all of which are painful.
- **Neglect:** The wounds were several days old and visible on routine inspection, yet affected birds remained in the general flock rather than being isolated, appropriately treated, or humanely euthanized.
- **Unnecessary and unjustifiable:** These conditions are frequently preventable through standard flock management and, once present, relievable through basic veterinary care or humane euthanasia.

These opinions rest on the veterinary records of five turkeys removed from the farm on October 9, 2026, each of whom required immediate veterinary care; photographs and video of birds still in the barn with the same lesions; and Jennie-O prescriptions prescribing medication for whole flocks at this farm for dermatitis and *E. coli* in 2021 and 2022. Prior complaints concerning Jennie-O, including the October 2023 ventilation-shutdown killings at this same farm, are summarized in Part IV.

II. Qualifications

I have been a licensed veterinarian in California for more than 25 years. I graduated from the University of California, Davis, School of Veterinary Medicine- consistently ranked the leading veterinary school in the United States- in 1998, after undergraduate study at Stanford University.

Since 2014 I have been Executive Director and Chief Veterinarian of Happy Hen Animal Sanctuary, where I have examined, treated, and cared for thousands of commercial turkeys, chickens, and other poultry, a large proportion of them removed from commercial production facilities. The conditions described in this report, including gangrenous dermatitis, septic and deformed joints, and parasitic and coccidial disease, are conditions I diagnose and treat in commercial-strain turkeys as a routine part of my practice. I have also served on the Board of Directors, and as Chair of the Ethics Committee, of a large humane society in Santa Clara County, California.

I have been retained as an expert in numerous criminal and civil matters involving animal welfare and industry husbandry standards, and have testified in legislative and administrative hearings. In 2023 I gave a veterinary opinion concerning a different Jennie-O turkey facility in Steele County, Minnesota, which was submitted to law enforcement with a criminal referral.

III. Materials Reviewed

- Veterinary records for the five turkeys removed from the facility, each examined on October 9, 2026, and identified by a colored leg tie, including intake photographs (the Turkey 3 record is available here);
- Follow-up examination records for the yellow turkey (October 14, 2026), the red turkey (October 14, 2026), and the green turkey (October 15, 2026);
- Discharge reports for the blue turkey (October 21, 2026) and the orange turkey (October 21, 2026);
- Photographs and video recorded inside the barn, including a view of the barn and flock, crowding at bird level, birds in the flock with necrotic lesions (1, 2, 3), birds with abnormal posture and gait (1, 2), and video clips of soiled, featherless birds on the litter and the barn interior;
- Photographs of wounds taken at veterinary intake (1, 2);
- Four Jennie-O Turkey Store Veterinary Drug Prescriptions for this farm, photographed at the facility on October 9, 2026, dated September 8, 2021, November 9, 2021, August 9, 2022, and October 10, 2022;
- The March 20, 2025 application of the Animal Legal Defense Fund and Animal Partisan to the Meeker County District Court for a search warrant concerning this facility (case summary), and the court's March 28, 2025 order on that application;

- My own contemporaneous notes of a remote video observation of all five turkeys on October 9, 2026, the day of their removal;
- My written assessment, Reasons for Presumptive Diagnosis of Gangrenous Dermatitis in 5 Rescued White Broad Breasted Turkeys; and
- The published standards identified in Part V.

The prescriptions identify the farm by name and by its address at 68651 315th Street, Litchfield, Minnesota 55355, and record Jennie-O's Hawick warehouse as the dispensing location. The five turkeys were juvenile Broad Breasted White turkeys approximately 4 months old.

IV. Background: Prior Complaints Concerning Jennie-O

Two prior complaints concern Jennie-O's treatment of turkeys in Minnesota.

- **2023 criminal referral (Steele County).** In November 2023, a criminal referral supported by my veterinary opinion documented infected wounds without appropriate care, birds unable to walk, dead birds left among the living, and intestinal parasites at a Jennie-O turkey facility in Steele County (referral and opinion).
- **2025 search-warrant application (this farm).** In March 2025, the Animal Legal Defense Fund and Animal Partisan asked the Meeker County District Court to order an investigation of Jennie-O's October 2023 killing of more than 50,000 turkeys at this farm by "ventilation shutdown plus": the barns were sealed and heated to 104°F, and the birds died over approximately three to four hours (ALDF announcement). The court's order confirms the farm's address (order, Finding 4). The court denied the warrant application, citing the age of the evidence and the agencies' authorization of the depopulation; it did not examine the method's effect on the birds. In my opinion, killing conscious birds by heatstroke over several hours causes severe and prolonged suffering.

The failures documented in this report, at a different facility from the 2023 referral and three years later, closely match those I documented in 2023. Together with the findings in this report, these complaints show a repeated pattern of serious violations of accepted animal welfare standards in Jennie-O's Minnesota turkey operations.

V. The Applicable Standards

Minnesota law. I understand that Minnesota law defines animal cruelty as any act, omission, or neglect that causes or permits unnecessary or unjustifiable pain, suffering, or death (Minn. Stat. § 343.20, subd. 3). My opinions address the veterinary facts relevant to that definition: whether the turkeys experienced pain and suffering, whether that suffering resulted from neglect, and whether proper care would have prevented or relieved it.

The veterinary standard of care for commercial turkeys. Any person responsible for a flock must observe the birds at least daily, identify birds that are injured, lame, or ill, and promptly remove them for treatment or humane euthanasia. This is basic flock management and is reflected in the industry's own commitments: the National Turkey Federation states that turkeys are raised with room to move about in protective barns, and that veterinarians prescribe medications. Jennie-O itself represents that it is "the advocate for the animals," that it employs veterinarians, nutritionists, and flock supervisors, and that its staff visit its farms weekly.

Gangrenous dermatitis. Gangrenous dermatitis is a bacterial infection of the skin and underlying tissue of commercial turkeys and broiler chickens, caused chiefly by *Clostridium* species, with lesions most often on the breast, abdomen, back, thighs, legs, and wings. The Merck Veterinary Manual identifies fever, listlessness, anorexia, ataxia, and recumbency as its main clinical signs, explains that failing to remove moribund or dead birds increases its incidence, and states that prevention includes avoiding skin trauma related to overcrowding. It is a disease of management: crowding, wet and soiled litter, and the retention of sick and dead birds in the flock are the conditions that produce it, and it is controlled by correcting those conditions.

Drugs in food-producing animals. A veterinarian may use a drug in a food animal other than as labeled only within narrow federal conditions, including a substantially extended withdrawal period "supported by appropriate scientific information" (21 C.F.R. § 530.20(a)(2)(ii)). A drug approved only for animals not intended for human consumption may be used in food animals only with an appropriate medical rationale, and where scientific information on its food safety in food animals is not available, the veterinarian "must take appropriate measures to assure that the animal and its food products will not enter the human food supply" (§ 530.20(b); FDA guidance). Accepted principles of judicious antimicrobial use require that "management and prevention strategies should be employed to minimize the need for antimicrobial drugs" and that therapy be targeted "to ill or at-risk animals when possible" (AVMA). The FDA ranks trimethoprim-sulfonamide combinations as "critically important" to human medicine, and penicillins and tetracyclines as "highly important" (FDA Guidance for Industry #152, Appendix A).

VI. Opinion 1: The Turkeys Suffered Severe, Painful Infections and Injuries Without Appropriate Care

Condition on removal. On examination the day of their removal, all five turkeys were approximately 5% dehydrated (intake record), and blood-tinged diarrhea (hematochezia) was present in the majority of the crates holding them. Four of the five had scabbed or open skin wounds; three had swollen joints. The examining veterinarian recorded concern for septic joints and for coccidiosis, prescribed antibiotics, an anti-inflammatory pain medication, and an antiseptic for the wounds, and gave a guarded prognosis.

Turkey 1 (yellow). At intake this turkey had two large scabbed wounds covering most of her left and right trunk, was bow-legged, and had bloody diarrhea. On re-examination five days later, the veterinarian found the left-sided wound "severe w/ major anterior/cranial pocketing down lateral aspect of the leg," diagnosed infected wounds and a bilateral varus deformity of the legs, and recorded that the bird needed surgical intervention for the pocketing (October 14 record). A wound that tracks beneath the skin down the leg is a deep, established infection. When I observed this bird by video on the day of its removal, her lesions were the most severe I have seen on any turkey.

Turkey 5 (red). At intake this turkey had a large scab covering most of the left trunk and a severely swollen left hock joint. At follow-up, the veterinarian recorded "bilateral scabbed wounds on the body with the left sided wound being larger and more severe than the right"; the left leg was edematous with a grape-sized fluid-filled swelling, the bird was lame on that leg, and the veterinarian diagnosed infected skin wounds (October 14 record).

Turkey 4 (green). This turkey had a wing wound with an opening that exposed underlying muscle, and a left hock joint that was moderately swollen and warm to the touch. At follow-up, fluid was aspirated from a fluctuant swelling of the left leg, and the bird was lame on that leg (October 15 record).

Turkey 3 (blue). This turkey was underweight (body condition score 2 of 5), with a swollen right hock joint that crepitated on manipulation, bruising, and an irregular heart rhythm (intake record). A veterinarian later found the joint "quite swollen, painful, and deviated at an abnormal angle," diagnosed a slipped tendon, discharged the bird on two pain medications with long-term pain management anticipated, and gave a poor prognosis for normal mobility, noting that the condition is common in poultry that grow at excessive rates or have nutritional imbalances (October 21 report).

Turkey 2 (orange). The least affected bird still had three scabbed wounds, bruising, broken feathers, fecal staining, and bloody diarrhea, and at recheck had mild joint swelling and diffuse feather breakage (October 21 report).

Diagnosis. The skin lesions I reviewed were brown to black, encrusted, and necrotic; they were located on the trunk and wings and in several birds covered areas eight inches or more across, in addition to extensive bruising and feather loss over the wings, trunk, and legs (intake photographs; close view). Their appearance, distribution, and prevalence match gangrenous dermatitis as I have diagnosed it in other commercial turkeys and support a presumptive diagnosis of that disease. Trauma may have contributed to some lesions, and one bird's full-thickness wing tear is most likely traumatic, but the extent and prevalence of the lesions point to an infectious cause (my assessment). Extensive skin infection of this kind can seed bacteria into the bloodstream and from there into joints, and the examining veterinarian was concerned that the swollen joints found in three of the five birds were septic. Later imaging of one of those birds attributed its joint deformity to a slipped tendon rather than infection. Musculoskeletal disease was present to some degree in all five.

My video observations. On October 9, 2026, I observed all five turkeys by video as a caretaker positioned and moved each bird. Turkey 4 sat on her hocks with her feet extended forward, an abnormal posture most likely caused by leg pain; her left leg below the hock was roughly twice the diameter of the right, and her wing tear exposed underlying muscle. Turkey 5's left leg was similarly enlarged, and she limped severely when she tried to walk. Turkey 3 stood hunched, and Turkeys 2 and 4 stood only with difficulty. Turkeys 3 and 4 were heavily soiled with feces, a finding typical of lame birds that spend most of their time lying in soiled litter in crowded conditions. Based on these observations, in my opinion most or all of these birds were unlikely to survive without extensive veterinary treatment, and some may need lifelong assistance to move.

Pain and suffering. Full-thickness skin loss, deep infected wounds, and inflamed, distended joints are painful conditions; every treating veterinarian prescribed pain medication, and one bird was discharged on two analgesics with long-term pain management anticipated. A lame turkey in a crowded barn must compete with thousands of heavier, mobile birds to reach feeders and drinkers, and lameness alone is a significant source of suffering in a bird of this body weight. Bloody diarrhea, for which the examining veterinarian suspected coccidiosis, adds intestinal disease to that pain.

Parasitic and coccidial disease. Bloody diarrhea was present at intake, and the birds' caretakers later reported that small worms were thought to be seen in a few fecal samples, prompting fecal testing (October 14 record). A photograph of feces from one of the rescued turkeys reveals the presence of roundworms. In addition, coccidia is an intestinal parasite that can cause bloody diarrhea, severe enteritis, and life-threatening secondary intestinal infections. The presumptive diagnosis of coccidia in the 5 turkeys strongly suggests flock-wide infection since coccidiosis spreads easily when litter and bedding are contaminated with infected feces.

VII. Opinion 2: The Conditions Were Present in the Flock and Were Left Without Appropriate Care

Prevalence. Four of five birds removed from the flock had skin wounds and all five had musculoskeletal disease. The photographs and video taken inside the barn show birds still in the flock with the same dark, necrotic lesions on the flank and wing (2, 3), birds with broken and soiled plumage, and a bird standing with an abnormal splayed-leg posture (image). Investigators reported that other turkeys at the farm were similarly affected (my assessment). The same barn holds thousands of birds filling the barn floor (image; image).

Visibility and duration. A lesion that can be photographed across a barn floor can be seen by any caretaker who walks that floor. The wounds in these birds were scabbed, encrusted, or pocketed, which means that they had been present for at least several days. Swollen joints with fluid accumulation and established limb deformities likewise take days to weeks to develop. Under the daily observation that the standard of care requires, each of these birds would have been identified and removed for treatment

or humane euthanasia many times over before October 9. Instead, these birds were still in the general flock on October 9.

What proper care would have provided. Wounded and lame turkeys should be moved to a hospital pen with easy access to food and water, given wound care, antibiotics, and pain relief, or humanely euthanized if their condition cannot be relieved. The response of these birds to basic care confirms that their suffering was relievable: twelve days after treatment began, the treating veterinarian recorded that the orange and blue turkeys had improved significantly since rescue, with good appetite and activity. The condition of these birds at removal is not consistent with that care having been provided.

VIII. Opinion 3: The Disease Was Known and Recurring, and Was Met With Mass Medication Rather Than Correction

The prescription records. The four Jennie-O prescriptions photographed at the facility show the following treatments, each prescribed for delivery through the drinking water of the entire flock:

- September 8, 2021: oxytetracycline, diagnosis "ECOLI," 10,366 birds at a recorded age of 7 (presumably 7 weeks), for 5 days;
- November 9, 2021: penicillin G, diagnosis "DERM," 9,376 birds at a recorded age of 16 (presumably 16 weeks), for 14 days;
- August 9, 2022: Equisul-SDT (sulfadiazine and trimethoprim), diagnosis "ECOLI," 9,479 birds at a recorded age of 8 (presumably 8 weeks), for 5 days, with a 45-day withdrawal period; and
- October 10, 2022: penicillin G, diagnosis "DERM," 8,855 birds at a recorded age of 17 (presumably 17 weeks), for 14 days.

A recurring outbreak. "DERM" is a standard veterinary abbreviation for skin, and penicillin in the drinking water is a flock-level treatment consistent with clostridial (gangrenous) dermatitis. The records therefore show a recurring skin disease diagnosis in flocks of nearly the same age (16 and 17 weeks), in the autumn of consecutive years, at the same farm, and the birds removed in October 2026, at a similar age, show lesions consistent with gangrenous dermatitis again. A disease that returns on schedule is a management failure. Its recurrence indicates that the conditions that cause it- namely crowding, soiled litter, skin trauma, and the retention of sick and dead birds- were not corrected. The documented response was flock-wide water medication of roughly 9,000 to 10,000 birds at a time with medically important antibiotics, while in 2026 individual birds with visible, painful lesions remained in the flock. Repeatedly medicating entire flocks for the same predictable diseases, rather than correcting their management causes, is contrary to accepted principles of judicious antimicrobial use (AVMA). The pattern is industry-wide: U.S. turkey producers report that their use of the antibiotic lincomycin has risen "due to increases in gangrenous dermatitis incidence" (USPOULTRY).

Jennie-O's stated commitments. Hormel says it focuses on "keeping our animals healthy so that antibiotics aren't needed," promises "identification of prompt treatment of sick animals," and claims

"a zero-tolerance policy toward the mistreatment of animals through abuse or neglect." Jennie-O has also agreed that medically important antibiotics "must be carefully managed to slow the emergence of resistant bacteria." Hormel's 2024 antibiotic stewardship report presents Jennie-O's manager of technical service and animal welfare as upholding the company's welfare commitments. That veterinarian approved all four prescriptions above, including the critically important to human health Trimethoprim Sulfa (Equisul-SDT). The evidence contradicts each of these commitments.

A pattern across Jennie-O facilities. The failures documented here, namely infected wounds without appropriate care, lameness, and parasitic disease, are the same ones I documented at Jennie-O's Steele County facility in 2023 (Part IV). Their recurrence at a different facility three years later indicates a systemic failure of the company's flock health and welfare program, not an isolated lapse by one caretaker.

IX. Conclusion

Turkeys at the Litchfield facility were kept in crowded conditions on soiled litter in which a painful, preventable, and recurrent skin infection spread through the flock. Birds with large necrotic wounds, swollen and deformed joints, and bloody diarrhea remained in the general flock with lesions several days old rather than being isolated, treated, or humanely euthanized. Jennie-O's own prescription records show recurring dermatitis and *E. coli* diagnoses at this farm in 2021 and 2022, addressed by flock-wide medication with medically important antibiotics, contrary to the company's own stated commitments, including a horse-only product (Equisul-SDT). The 2026 evidence shows that the conditions producing the disease persisted and that individual affected birds did not receive appropriate care.

In my professional opinion, held to a high degree of veterinary certainty, the turkeys at this farm experienced substantial pain and suffering; that suffering was permitted by the failure to identify, isolate, treat, or humanely euthanize affected birds; and it was unnecessary and unjustifiable, because the underlying conditions are preventable through standard management and relievable through basic veterinary care. I am prepared to explain these opinions under oath.

I will supplement these opinions if the facility's mortality, culling, treatment, or flock health records become available.

Respectfully submitted,



Sherstin L. Rosenberg, D.V.M.
Executive Director and Chief Veterinarian
Happy Hen Animal Sanctuary