

**In the United States District Court
Western District of Missouri**

RURAL COMMUNITY WORKER'S ALLIANCE
and JANE DOE

Plaintiffs,

v.

SMITHFIELD FOODS, INC. and SMITHFIELD
FRESH MEATS CORP.,

Defendants.

Declaration of Jane Doe

I, Jane Doe, hereby declare as follows:

1. I have worked at Smithfield's Milan, Missouri slaughterhouse and processing plant (the "Plant") for more than 5 years.

2. I work on the "cut side" of the plant, where animals are broken down into products and packaged.

3. During my time as an employee of the Plant, I have attended meetings and participated in events as a worker member of the Rural Community Workers Alliance ("RCWA").

4. I am afraid for my health and safety, as well as the health and safety of people I am in contact with, and the larger community because of the way in which Smithfield is managing the Plant in response to COVID-19.

5. It is only in the last week that Smithfield began providing us with surgical-style masks. Smithfield originally told us that we will receive only one such mask per

week, unless it breaks. Although, at least one day this week, Smithfield handed out new masks as workers entered.

6. Nonetheless, even as Plant workers have masks, I have seen members of the sanitation crew inside the Plant, and even walking off of the cut floor, without masks on. I have also seen them sitting in the hallway without masks on.

7. Smithfield has made no effort to spread out workers doing their jobs. From where I stand on the cut floor, I can see many workers standing shoulder-to-shoulder so that they regularly come into physical contact with one another, and could even cut one another with their knives. Even worse, Smithfield has increased our line speed during COVID-19, causing workers to move with the line to finish their tasks. This leads workers to come into contact with one another more frequently.

8. Smithfield placed Plexiglas dividers between some, but not all, workers in the Plant.

9. Further, Smithfield has lengthened our shift time since the COVID-19 pandemic started; our shifts are sometimes as long as eleven hours. During those shifts we are only provided three breaks, two fifteen minute breaks and one thirty minute break, at the end of which we must be back in position on the line. As a result, we barely have time to get off and back on the line, let alone wash our hands thoroughly.

10. Smithfield has not provided any additional breaks for us to be able to wash our hands.

11. This week, Smithfield has sent people around the lines to spray our hands, but they will only spray our gloves.

12. Smithfield has also not provided us tissues for when we sneeze or cough.

13. Although Smithfield has instructed us to stand six feet apart while off the line, it continues to allow many workers to take breaks at the same time, which makes social distancing impossible.

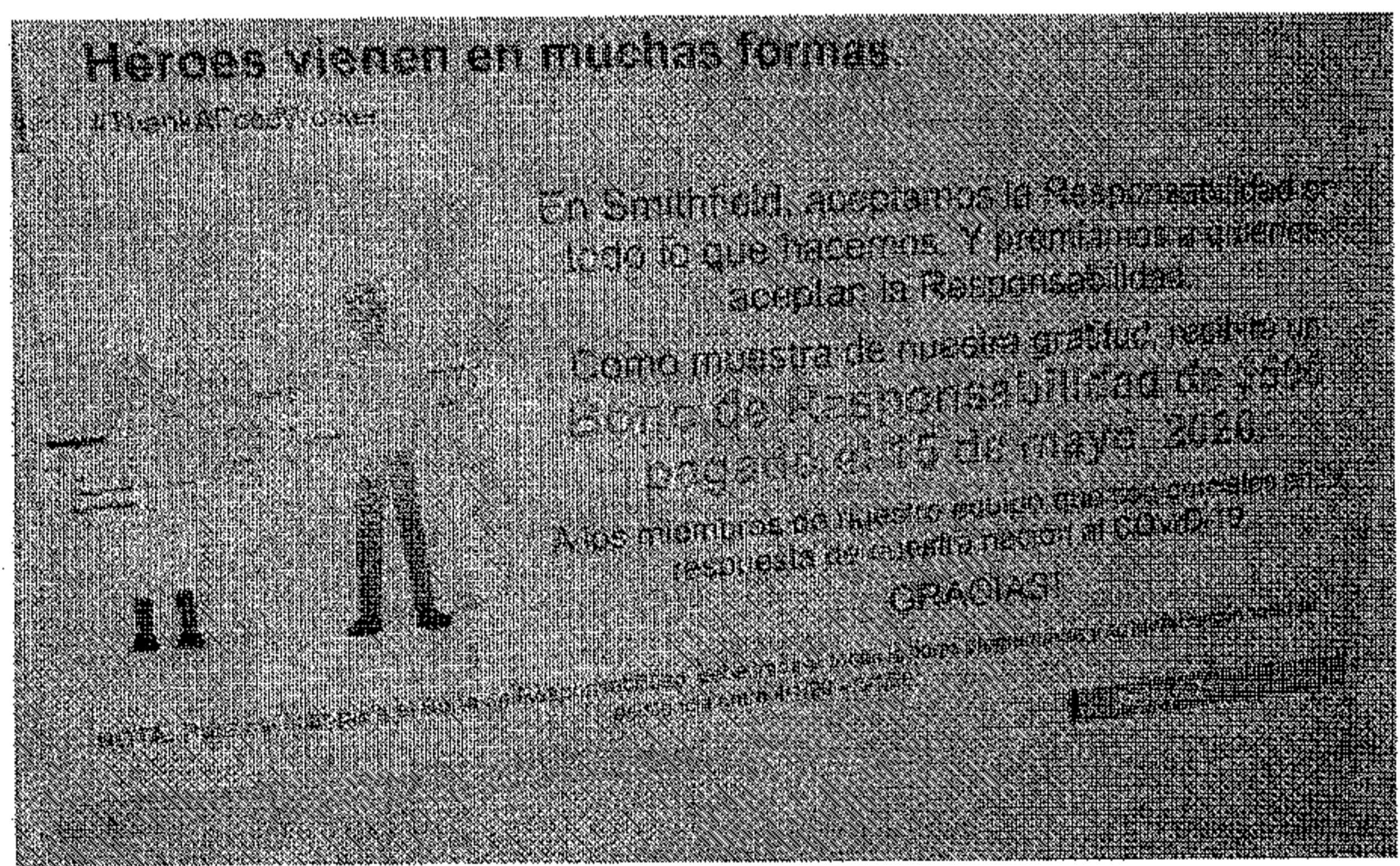
14. There are not enough seats in the cafeteria for all the workers who are allowed to be in it at the same time. To sit at tables, people must be closer than six feet and there are not Plexiglas dividers between all people at the table.

15. Restrooms and hallways are also very crowded. This is particularly true at the start and end of the shift in the hallway where we clock in and clock out.

16. Moreover, although Smithfield has started taking workers' temperatures when they enter the Plant, it allows a close line to form while workers wait.

17. Smithfield has also encouraged workers to come into work sick. When the COVID-19 pandemic began, workers began to self-isolate. Soon after workers began to stay home, Smithfield offered workers a free lunch, during which it promoted a \$500 bonus for workers who did not miss a shift in April.

18. The image below is a poster that I have seen in the Plant advertising the bonus and it is still hanging in the Plant.



19. Moreover, I believe that many workers are afraid of the company, which leads them to come to work even when they feel ill. Workers are too worried about losing their jobs to raise concerns about Smithfield's COVID-19 practices. For example, Smithfield regularly disciplines workers who miss a shift even when they are sick. Smithfield typically does not give sick leave and assigns a "point" for every shift missed. If a worker receives 9 points in a year they can be fired. Systems like this make people afraid to speak up.

20. Furthermore, many workers, including myself, have children and have laid down roots in the Milan area. There are not many employment opportunities in the area besides Smithfield and thus losing this job would mean a struggle to find new work and likely having to spend additional time away from one's family to travel to new work, along with finding the child care that requires.

21. To my knowledge, at least eight workers have been out sick with symptoms of COVID-19.

22. To my knowledge, Smithfield has not advised any Plant workers that they have been in contact with someone reporting COVID-19-related symptoms.


23. I fear what will happen to me if Smithfield finds out I am participating in this suit. I could not afford to lose my job.

24. However, I am more fearful of the risks Smithfield is creating for me, my co-workers, friends, neighbors, the Milan area, Missouri, and the country as a whole. I fear the risk of getting sick from COVID-19 at the plant due to the close contacts I am forced to have with other workers and then infecting others.

25. Thus, despite my fears of Smithfield's reaction, I chose to be a Plaintiff in this case to protect myself and others.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Milan, MO

DocuSigned by:

DocuSigned by:
Jane Doe
4/22/2020
Dated