

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSINA**

BREMERLEY FAMILY FARMS; WILLIAM
BREMERLEY,

Plaintiffs,

v.

ANIMAL ACTION NOW; BLAINE CARDILLO,

Defendants.

Case No. 3:21-cv-86753-RWS

**AFFIDAVIT OF BLAINE Q. CARDILLO IN SUPPORT OF DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Being duly sworn, Blaine Cardillo, deposes and states the following as true, under oath.

1. I am a resident of Speegleville, North Carolina. I am at least 18 years of age, of sound mind, and would testify as follows if called as a witness in this matter.
2. For the past three years, I have worked as an investigator for Animal Action Now (AAN).
3. In this role, I take jobs on animal raising facilities and in slaughterhouses, document the conditions and practices inside, and turn over to AAN video footage, photographs, and notes I take while working in the facility.
4. Over the last three years, I've worked at a pig slaughterhouse for three months, a turkey hatchery for seven weeks, and an auction house at which horses, sheep, and cows are sold, for two months.
5. On April 17, 2021, I found an advertisement, on a job search website, for a position as a Farm Laborer at Bremerley Family Farms, an egg farm in Leosville, Wisconsin. At AAN's direction, I followed the link in the ad and submitted an application via a form on the farm's website.
6. As I've done at each of the previous animal facilities, I used my real name (Blaine Cardillo) and home address. I truthfully described my prior work experience except that I omitted my position with AAN.

7. On April 19, 2021, I received a call from a person who identified himself as Bill Bremerley, owner and manager of Bremerley Family Farms.
8. Mr. Bremerley asked if I had any prior work experience at egg farms or other poultry facilities; I mentioned the turkey hatchery job.
9. Mr. Bremerley asked if I am a hard worker, and I said yes. Finally, he asked if I've ever been fired from a job. Again I replied truthfully: I said I haven't.
10. Mr. Bremerley asked me how soon I could start, and I told him April 26, 2021. I accepted the position.
11. I started work at Bremerley Family Farms in Leosville, Wiscabama on the morning of April 26, 2021.
12. That first morning I watched a 20-minute training video that went over the company's history and philosophy, safety precautions, and biosecurity protocols.
13. Mr. Bremerley then assigned me to shadow one of the farm's supervisors, to learn my tasks. After donning plastic booties, a plastic apron, a hairnet, a face mask, and plastic goggles—following the biosecurity protocol—I followed the supervisor into the barn.
14. Although I'm accustomed to animal facilities and have seen a lot of disturbing and disgusting things in my various positions as an investigator, nothing prepared me for the sights, sounds, and smells that hit me inside the egg barn.
15. The stench almost doubled me over—my eyes burned and watered behind the goggles and I started to gag.
16. The noise was deafening. The barn holds 300,000 hens, and it sounded like all of them were shrieking at once, at the top of their lungs.
17. Although the barn was dimly lit, when my eyes adjusted I could see tiers of cramped battery cages stacked floor-to-ceiling and extending in rows down the barn as far as I could see.
18. The cages were caked with a fine, fuzzy coating of filth. And each was crammed with hens jostling, flapping, stumbling, and stepping on each other. Many hens' wings were almost wholly stripped of their feathers, making the hens look skeletal.
19. The ground under my plastic booties felt squishy in places, and when I looked down I could see it was covered in feathers, dander, and bird droppings.
20. When I looked more closely into the cage nearest me, I could see the mummified body of a hen, melded to the bottom of the wire cage, her cage mates stepping on her.
21. As I followed the supervisor down the row, I spotted a hen trapped in the waste pit below the cages, struggling and flapping.
22. I asked the supervisor how we could get her out, and he just kept walking and said not to worry about it—hens fall into the pit all the time and “we just leave ‘em.”
23. I listened closely to the supervisor's instructions and shadowed his work the rest of the day. He explained how to check the egg conveyer belts to make sure they were

- running smoothly, check the feed troughs and water tubes to make sure they were functioning, and remove any cracked eggs from the conveyor belts.
24. He showed me various other pieces of equipment around the barn and what to do in case of a power failure.
 25. I asked what I should do if I saw a hen who appeared to be injured, or trapped between the bars of her cage. He showed me how to open each cage.
 26. The supervisor said we're supposed to remove dead and injured birds and to use the bottle opener-looking thing bolted to the wall at the back of the barn to pull the injured bird's head off to kill it, before dropping the bird in the bucket below. The supervisor said he would show me how to do this later.
 27. But the supervisor went on to say that he almost never gets the dead and injured ones out because birds can fly out if we open the cage door, and also if we removed every dead and injured hen, "we'd never get anything done."
 28. At the end of the day the supervisor sent me back to the office where I'd watched the video in the morning.
 29. Mr. Bremerley gave me a piece of paper and asked me to sign it. I started to read it and saw that it was an employee certification for completion of an "animal welfare standards" training.
 30. When I asked him if I needed to complete a course or watch another training video before signing the form, he told me not to worry about it—that it was "just for my file."
 31. The next day when I came to Bremerley Family Farms at the start of my shift, I brought my pinhole camera.
 32. When I conduct an investigation, I wear the pinhole camera on my body, recording video and sound inside the facility as I go about my work. The camera doesn't impede my movement. I can turn it on and off quickly with virtually no effort.
 33. That day, I went about completing the tasks the supervisor had described, turning my camera on periodically throughout the day.
 34. I saw a lot of birds who looked terrible—twisted wings, mangled feet, labored breathing, bloody wounds. Some birds huddled in the backs of their cages, trembling.
 35. I told the supervisor about these sickly and injured birds and asked him whether we should contact a veterinarian. He said no.
 36. I then asked the supervisor if I should remove the birds in the worst shape and euthanize them with the hook thing on the wall. He said not to bother and didn't offer to show me how to use it.
 37. That day, I also saw a lot of eggs on the conveyor belt that looked dirty to me—streaked with waste. I asked the supervisor if I should remove them, but he said not to worry; they would be washed and pasteurized later.

38. I finished my shift, went back to the hotel room I was staying at, uploaded to AAN's secure file storage platform the video footage I'd taken that day, as well as my notes summarizing the day's events and observations.
39. After that, my work days at Bremerley started to blend together. I would go about the barn performing my assigned tasks to the best of my ability, while continuing to document the conditions inside the facility with my pinhole camera.
40. Every day I continued to see many, many birds in terrible shape, and continued to document the filth that was pervasive in the facility, including cockroaches and maggots in the waste pits below the hens' cages.
41. After my fourth day at work, I began developing a sore throat, itchy, watering eyes, and a persistent burning sensation in my esophagus, almost like heartburn.
42. I noticed the symptoms improved when I had a day off, but got worse when I returned to work at Bremerley.
43. When I told the supervisor about the symptoms he said not to worry about it—that it was common for new employees and would get better.
44. All the same, I bought an N-95 mask and tight-fitting painters goggles at the hardware store that evening and wore them inside the barn after that.
45. The next day, my fifth day of work, I was inspecting an egg conveyor belt when I saw, out of the corner of my eye, the supervisor stomp on the ground. When I looked over I saw a hen lying there in the dirt. I watched as the supervisor picked up the bird's limp body and dropped it in the bucket underneath the hook fastened to the wall.
46. I walked over to the bucket and saw a pile of dead hens inside. On top of the pile, a dying hen was breathing slowly and shallowly, her eyes closed. I wanted to put her out of her misery but did not know how.
47. I remembered a sign I'd seen in the office the first day that said, "Report Animal Abuse." I stopped by the office on my way out. Mr. Bremerley wasn't there, but I took a picture of the sign.
48. That night, I went to the website listed on the sign and submitted an online form providing details about the incident I'd seen with the supervisor.
49. A few days later, while walking down a row I saw another employee grab a hen who was stuck halfway out of her cage, pinned between the bars at the side of the cage. He yanked the hen's head violently as if trying to pull through, but she just flapped and remained stuck.
50. After the employee walked away I went over to the cage, opened it a crack, and gently tried to guide the hen's head out from the inside. I was pecked and scratched but was able to extricate her from the bars.
51. That night after uploading my footage and notes to Animal Action Now, I used the "Report Animal Abuse" website again to submit information about the employee who had yanked the hen's head through the cage.

52. The next morning on my way into the barn I stopped by the office, where Mr. Bremerley was working, and told him I'd seen the employee yanking a bird's head through the bars.
53. He thanked me quickly but did not ask any more questions, and immediately went back to typing at his computer. He didn't seem to want to ask any questions or hear any more about it, so I left quickly.
54. One day during my second week of work, I tried to count (and videotape) the number of dead birds plastered to the bottom of cages. As I walked up and down the rows performing my usual tasks that day, I counted 87 in various states of decomposition.
55. Another day that week I counted the number of live birds trapped in the waste pits below the tiers of cages. I found 12.
56. One morning when I arrived at Bremerley, the noise in the barn sounded even louder than usual. As I walked down a row I saw that the feed level in a few of the troughs was very low.
57. I immediately went to the supervisor and asked if there was a problem with the feed or the troughs. He said we'd run out of feed the night before, but not to worry, as it should be coming the following day.
58. By the time the feed truck came, two days later, the feed troughs in half the barn had been completely empty for about 24 hours.
59. Each night when I returned home from work I followed the same routine of uploading my footage and notes to AAN. But by the end of the fourth week of work at Bremerley Family Farms, my physical symptoms were not improving.
60. I was also starting to get bad headaches after coming home from work at night, so AAN decided to end the investigation.
61. I called Mr. Bremerley the next day and said that I needed to resign my position. I did not give a reason. Mr. Bremerley said that was too bad, but he did not ask why I was leaving. I gave a week's notice.
62. That last week, I continued to document the conditions inside the barn as I did my work.
63. My last day at Bremerley, June 9, 2021, I saw (and recorded) the supervisor forcefully kick a hen who had escaped from her cage down the row. The bird slammed into the cages and struggled to her feet.
64. That night I again used the "Report Animal Abuse" tip portal to submit this incident to Bremerley Family Farms.
65. After I left Bremerley Family Farms, I spent several days going over my notes and video footage with employees of AAN, explaining the details of incidents I'd captured on video.

Commented [1]: doesn't mummified mean not decomposing?

Commented [2]: will say "dead" instead of "mummified"

66. I recorded with AAN a video message in which I talked about what I'd seen in my role at Bremerley Family Farms, and urged viewers to choose kindness, and leave eggs and other animal foods off their plates.
67. AAN later used the video footage I recorded inside Bremerley and my video message in one of several video clips it used to release the results of the investigation and call on Vegman's to drop Bremerley Family Farms as a supplier.
68. After the investigation was released, I participated in AAN's public and media outreach: I was interviewed by UBC News and also gave a few interviews to local news outlets in Sharingsworth County.
69. A few weeks after our publicity blitz for the investigation, I became aware that Bremerley Family Farms was going on the offense, and claiming that we were lying about the investigation and what I found and saw there.
70. While I was not surprised that they would strike back and try to deny what I'd documented in my hours of videotape taken at the facility, I was scared when they threatened to sue us, even though I knew that everything I had seen and recorded had really happened, that I had followed all the rules, and that we were being fair and accurate in our description of what I had seen and documented at Bremerley Family Farms.
71. Now that we've been sued and Bremerley Family Farms is seeking millions of dollars in damages, I am afraid about speaking out, and feel I'm being punished just for talking about what I saw while doing my job and for showing the public the truth about what happens behind the closed doors of animal agriculture facilities.

April 10, 2022

Blaine Q. Cardillo