

Affidavit of Sarah-Jean Buck

I attended high school in California. I graduated in 1997. I went to a trade school in California for medical assisting. I graduated in 2001. I received a certificate for completing the degree in California. Colorado requires its own certification for medical assisting, which I do not have. I have done medical assisting for about fifteen years. This entails helping doctors with everything in the back of the office – bringing patients to the exam room, taking blood pressure and vitals, drawing blood and administering shots. In addition to the back office side, I also did front end administrative work. I spent most of my career in California but have done some medical assisting work in Colorado as well.

I did not work for about two years prior to beginning the job with Medix. I went on Indeed.com to begin looking for work. Medix reached out to me after seeing the resume I had uploaded to Indeed, and asked me whether I, or anyone I knew, was interested in a position as a temperature taker at the JBS plant in Greeley, Colorado. I accepted the offer and began working as a temperature taker on or about May 10, 2020.

I was advised that we would take employee temperatures in a tent outside the plant. But the “tent” is not really a tent – it is a tarp on metal stands. There should be something to control the air pressure or air flow but there is not. Social distancing is impossible.

When I arrived for work the first time, we met at the tent outside but Donald Shrine and Cecilia (I cannot recall her last name) walked us around the plant. Donald Shrine is the head of safety and Cecilia is the head of health services. Although I did go in the plant during one of my shifts, my job duties did not require I do anything inside the plant so I do not know why they showed us around in there.

Donald and Cecilia explained that my job was to have employees walk through the camera, take their mask off, and then when they got to me, I would give them a mask if needed. I was not given a training manual or list of instructions. I was not instructed to ask anything. A week or so into working at the JBS screening, it occurred to me that I should probably ask each employee questions like whether they were feeling okay, had been sick recently, or were experiencing common COVID-19 symptoms. So, on my own, I started asking employees whether they had a cough, fever, chills, or shortness of breath in the last three days. Donald remarked that this was a good idea, but also said I should just ask an employee if they were feeling okay with a thumbs up as so many of them did not speak or understand English. There were no materials in languages other than English.

People working security at the plant do not get screened. During the time I worked at the plant, two security personnel came to work sick for a few days. Someone tried to tell them to go home but they would not. By the nature of their work, security touches other people’s things – for example, opening bags and combing through the contents inside – but they are not screened. I raised this after one girl said she had been working while sick for a couple of days – she was coughing and reported it was difficult to breathe. Security personnel were not JBS employees; like me, they work for a third party so I was not sure what the proper protocol was when she was sick at work. I told Cecilia that security needed to be screened just like the JBS employees. Nothing changed.

We used a temperature gun and a thermal machine to test temperatures. The temperature gun has to be close to a person to read their temperature. Sometimes I would accidentally touch an employee with the temperature gun and would clean it afterwards. It is a pretty simple device to figure out. But, I received no particular training on how to use it.

The temperature gun did not work. It would provide only the same few temperatures over and over again. Sometimes, it would register the exact same temperature for many people in a row, which is not realistic or accurate. I would say to Donald something to the effect of “this is not working, it is reading the same temperature for the past ten people” and he would respond something to the effect of “oh you’re on a streak, it’s fine.” And I would say no, we are not all the exact same temperature. The issue with the temperature gun was consistent throughout the time I worked as a screener, which was approximately two months.

My final week at JBS, around mid July, the first digit on the temperature gun would not display. I accidentally broke the gun when I dropped it on the ground. It had lines on the screen but should not show you the full number. For example, you might see .3 but you wouldn’t know if the temperature was 100.3 or 97.3. JBS would not replace it because Cecilia thought it was sufficient that you could kind of see the temperature reading. But it was broken – I know it was broken because I broke it.

I was not told to ask any questions – I was only told to check an employee’s temperature and give them a mask. Also, English is not the main language for a lot of JBS employees so even when I started asking questions on my own accord, it is not likely most people understood what I was saying. JBS instructed me to get a thumbs up or down, but the workers did not give thumbs down. I still do not think they understood what we were doing. There was a sign before the tent with questions about symptoms but it was only in English with a few pictures. I asked Donald and Cecilia about providing questions in other common languages spoken at the plant but they said there were too many languages to try to do that.

The tarp area itself was a mess – it was really filthy. I would have to wipe a surface down three to four times to get the dust and dirt off. We actually bought our own wipes and other materials at first as JBS did not provide them.

There was no social distancing waiting to enter or in the tarp. I would try to ask employees to stand six feet apart but I think many did not understand what I was saying. In particular, employees would come up very close to the screeners when asking questions, and also when we took their temperatures with the guns. They were told to take their mask off for the screening – some would put it back on when they approached the screeners but a lot of them did not and they were in very close proximity to us.

Sometimes, workers would ask for an additional mask or two. Someone told me they could not get any inside the plant. That was during night shift so I am not sure if masks were available in the plant during other shifts.

Sometime in mid-June I went inside the plant during one of my night shifts. A worker came out because he was upset that someone was coughing all over him and was not wearing a mask. No one from JBS was there with me so I said, show me who it is and I will try to screen him. We never found the guy but

we went through the plant and I saw only one person wearing a mask. I told Donald, Cecilia, and Neil about this. I offered to go inside sporadically during my night shift to check that people were wearing masks but they said no, it is fine, and told me not to go in the plant anymore.

There were times large groups of employees would enter the plant without being tested. One time, the computer for the thermal scanner was not working; JBS was aware but said there was nothing they could do and sent people in. They even joked about it later, saying casually “no one this morning got temperature tested.” Another time, Donald told me I could begin my shift at 4 and no one was tested who arrived before then.

Even when it was technically working, the thermal reader did not work properly – it read everyone’s temperature at either an extremely low or extremely high temperature. In the afternoon, it would often read temperatures around 107 degrees, probably because it would be very hot under the tarp by that time of day. If I was out there alone, I would try to retest anyone who tested high but JBS would tell me to let them through, they would say something like, it is just really hot out here, or it must be their black hat.

For about a week, we used the temperature gun on every tenth employee who came through screening. Then for another week or so, we did not use the gun at all, and then we were instructed to use the temperature gun every fifty employees who passed through. All of the employees went through the thermal temperature scanner.

One day, I received a text JBS was not going to pay for COVID-19 tests anymore – the employees needed to pay with insurance or the cash price of \$100. JBS put it on us to explain to employees the tests would not be paid any longer. These are employees who are saying they do not feel well – and then they changed their mind once they hear they need to pay, saying some excuse like it is just my sinuses acting up.

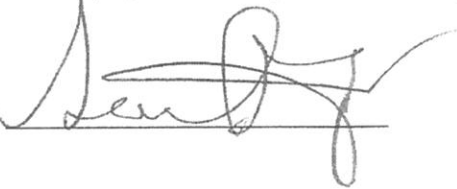
JBS would try to convince people they were fine to go to work. For example, if someone came through screening and reported having a cough, Cecilia would ask if they slept with their window open. If the employee said yes, then Cecilia would say that was causing the cough and they were fine to go to work.

After about two months, I quit. There were a lot of issues. One day, a girl came in coughing so much she could not even talk so I sent her home. She had been sent home a few times but kept trying to come back to work. I told her she needed to be without symptoms for three days before returning but she told me her manager was saying she needed to come in. Even if it was not COVID-19, she was evidently sick. No supervisor or JBS management was at the screening area at the time so I decided to send her home. This employee’s manager asked me why her QA was sent home. I told her she was sick. The manager left. A few hours later, Donald and Neil told me I should have cleared her for work even if she declines a test because she cannot pay for it. I am not going to sign anything approving someone to go into work when they are clearly sick – that is not right and I will not do that so I quit.

In my opinion, I would describe the thoroughness and effectiveness of JBS’ screening as non-existent. I do not believe JBS had any interest in ensuring accurate screening. We raised issues all the time and

none of it mattered to JBS – the thermometer inaccuracies, the language barriers, and even the tarp area itself – they called it a tent but it was a tarp on metal bars that were not anchored to the ground so if it was windy, they would fly around. A metal bar fell and almost hit an employee one time. There were also mosquitos everywhere. My daughter and I both developed a rash but I was told so long as it was not chicken pox, I could return to work. I am not sure if I got the rash from the chemicals they used under the tarp but it likely could have been – I asked what chemicals they were using but no one would tell me.

My impression was that JBS corporate thought people were using COVID-19 as an excuse to take time off from work so JBS was trying to make it more difficult for them to take time off. First, they paid for testing, then they only paid if the employee had a positive test result, then they stopped paying for the tests entirely. JBS' attitude incentivizes people not to admit when they feel sick because they do not want to miss work and not get paid, and it incentivizes people not to get tested because most people cannot afford the test. JBS was doing what they needed to do to look like they were following guidance to properly screen and protect employees but they were not doing enough.

Signed by Sarah-Jean Buck 

State of Colorado

County of Denver

Signed and sworn to [or affirmed] before me via video conference on July 29
2020 by Sarah-Jean Buck (name(s) of individual(s) making statement).

Robin Chadwick
(Notary's official signature)

Notary
(Title of office)

10/30/2022
(Commission Expiration)

