



## Agricultural Antitrust Legal Update: May 2021 – May 2022

Below is a listing of selected legal and regulatory developments relating to agricultural antitrust issues during the past year.

### **DOJ Files Notice Supporting Continued Prosecution of Poultry Executives in Price-Fixing Case**

On April 25, 2022, the U.S. Department of Justice (DOJ) filed a notice in the U.S. District Court for the District of Colorado stating DOJ's intent to continue its prosecution of poultry executives Jayson Jeffrey Penn, Roger Born Austin, and William Wade Lovette of Pilgrim's Pride, and Mikell Reeve Fries and Scott James Brady of Claxton Poultry. *United States v. Penn*, No. 1:20-cr-00152 ([docket 1](#); [docket 2](#)). In the notice, DOJ states that it has performed a "thorough examination of the law" and "admissible evidence" and that the agency still believes that multiple factors support prosecution of the remaining executives, including "the significant impact of the charged conduct on the public, the deterrent value of the prosecution, and the nature and seriousness of the charged offense." The notice follows a hearing on April 14, 2022, during which Jonathan Kanter, Assistant Attorney General of the DOJ's Antitrust Division, appeared in person and commented on why the government should re-try the case against the executives a third time. On April 15, 2022, the court issued an order scheduling the case for a nineteen-day jury trial beginning on June 6, 2022.

### **Lawsuit Claims Dairy Farmers of America and Select Milk Conspired to Suppress Dairy Farmer Payments**

On April 4, 2022, six New Mexico dairy cooperative members filed a complaint in the U.S. District Court for the District of New Mexico against Dairy Farmers of America (DFA) and Select Milk Producers, Inc. (Select), alleging that the defendant dairy cooperatives conspired to depress members' raw milk price in violation of the Sherman Act ([15 U.S.C. § 1](#)). *Othart Dairy Farms, LLC v. Dairy Farmers Of America, Inc.*, No. [2:22-cv-00251](#). The plaintiffs claim that DFA and Select—who the plaintiffs state control at least 75% of the Southwest dairy market—have used their market share to suppress dairy prices by sharing and coordinating pricing information and decisions and by "selective[ly] . . . nonpooling" milk, which the plaintiffs claim "allow[s] the cooperatives as entities to market members' milk at higher prices without passing those increases on to farmers." The plaintiff dairy producers further claim that the monthly rates DFA and Select pay their respective members "are almost always within a few pennies of each other," which the plaintiffs state "would not be the case absent the conspiracy alleged herein."

### **2022 Appropriations Act Provides \$1 Million for Cattle Contract Library Pilot Program**

On March 10, 2022, the U.S. Senate approved (68–31) the Consolidated Appropriations Act of 2022 ([H.R. 2471](#)), previously approved by the U.S. House of Representatives on June 29, 2021. [Section 779](#) of the legislation allots \$1 million until September 30, 2023 for the U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) to create a Cattle Contracts Library pilot program to be maintained in AMS's [Livestock, Poultry, and Grain Market News](#) Division, similar to USDA's [Swine Contract Library](#) established under the Packers and Stockyards Act ([7 U.S.C. § 198a](#)). In response, the North American Meat Institute issued a [press](#)



[release](#) on March 11, 2022, criticizing the [law's provision](#) allowing AMS to promulgate rules for the program without public comment, calling the law "vague," and stating that it will require producers to "report proprietary and sensitive data to the government for publication." However, bipartisan legislation to create a cattle contract library passed the House in December 2021 ([H.R.5609](#)), which was [endorsed](#) by the American Farm Bureau Federation as a "common sense" move to increase cattle market transparency.

### **Federal Court Finds Pennsylvania Mushroom Cooperative Not Entitled to Antitrust Protection**

On January 26, 2022, the U.S. District Court for the Eastern District of Pennsylvania issued an [order](#) and [opinion](#) holding that the American Mushroom Cooperative (AMC), formerly named "Eastern Mushroom Marketing Cooperative" (EMMC), was not entitled to protection under the Capper-Volstead Act, which exempts agricultural grower cooperatives from some antitrust laws. *Winn-Dixie Stores, Inc. v. Eastern Mushroom Marketing Cooperative, Inc.*, No. [5:15-cv-06480-BMS](#). Winn-Dixie Stores, Inc. brought suit against EMCC/AMC in 2015, claiming that the entity's members had conspired among themselves and third parties to fix mushroom prices. In a [related 2009 ruling](#), the court held that EMCC/AMC could not claim antitrust immunity under Capper-Volstead because it found that the EMCC/AMC did not consist solely of producer members. In the 2015 case, EMCC/AMC claimed that it could still receive Capper-Volstead immunity despite its failure to previously gain the statute's protections because the non-producer member issues in the 2009 ruling had since been resolved. However, the court found that EMCC/AMC member Bella Mushroom Farms (Bella)— a general partnership between Robert, Rosemarie, Peter and Robert Jr. Feranto—and its distributor, Buona Foods (Buona)—a corporation held by Robert and Rosemarie—could not be determined to be a "single entity incapable of conspiring with one another" and thus EMCC/AMC was not entitled to Capper-Volstead immunity because the entity contained a non-producer member. Although the court noted that "family relationships are not determinative," the court stated that Buona buys 100% of Bella's products. The court also noted that, while Peter negotiated for Bella, "Robert (who had no ownership interest in Buona) negotiated for Buona when it dealt with Bella," which the court stated, "further muddies the waters with respect to whether the parties' . . . impermissibly 'joined together separate decisionmakers.'" Most importantly, the court found that Bella's and Buona's interests were not aligned and that the price fixing did not protect the grower's economic interests because "EMMC/AMC prices were set at the distributor level and Buona's sales were governed by the EMMC's minimum pricing policies." The court then granted summary judgment in favor of Winn-Dixie.

### **JBS Class Action Settlement Agreement Will Pay Direct Purchaser Plaintiffs \$52.5 Million**

On February 1, 2022, the Direct Purchaser Plaintiffs (DPPs) in consolidated civil antitrust class action litigation against multiple large meatpacking companies filed a [memorandum](#) supporting a settlement between the DPPs and defendants JBS S.A., JBS USA Food Company, Swift Beef Company, and JBS Packerland, Inc. (JBS). *In re Cattle and Beef Antitrust Litigation*, No. [0:20-cv-01319](#). The DPPs claimed that the defendant meatpacking companies colluded to fix beef prices and suppress beef production. According to the agreement outlined in the memorandum, JBS will pay \$52.5 million into a settlement fund to compensate the DPPs, finance administration of the settlement, and cover litigation expenses. The settlement agreement, which names notice and claims administrator A.B. Data as the notice provider, calls for the court to require the non-settling defendants to turn over their customer contact information to assist in notification of the class within 30 days of court approval of the settlement. On February 4, 2022, the DPPs filed a [proposed order](#) for the court's approval of the settlement.



## **USDA and DOJ Announce Online Portal for Anticompetitive Practice Complaint Submissions**

On February 3, 2022, the U.S. Department of Agriculture (USDA) and the U.S. Department of Justice (DOJ) [announced](#) their new online tool, [farmerfairness.gov](https://farmerfairness.gov), where livestock and poultry producers can anonymously [submit complaints and tips](#) concerning unfair and anticompetitive industry practices. Submissions will be reviewed by USDA Packers and Stockyards Act (PSA) staff and DOJ Antitrust staff for potential PSA and antitrust law violations. Complaints that raise sufficient concern under the PSA or antitrust laws will be further investigated by USDA and DOJ. Submissions need not contain the name or information of the submitting party, but they should include the names of the parties involved in the alleged unfair conduct, a description of the conduct, how that conduct created harm, and who was harmed by the conduct. According to the agencies' announcement, USDA and DOJ will sign a memorandum of understanding (MOU) to formalize their partnership and facilitate communication between the agencies.

## **White House Announces Plan to Increase Competition in Meat and Poultry Industries; USDA and DOJ Announce Joint Antitrust Initiative**

On January 3, 2022, the White House held a [roundtable conference](#) with Agriculture Secretary Tom Vilsack, Attorney General Merrick B. Garland, and several independent producers to discuss anticompetitive industry practices and announce the administration's [Action Plan for a Fairer, More Competitive, and More Resilient Meat and Poultry Supply Chain](#). The plan encompasses four primary focus areas to increase competition in the meat and poultry industries: 1) a [joint initiative](#) between the U.S. Department of Agriculture (USDA) and the Department of Justice (DOJ), 2) \$1 billion in funding to expand independent processing facilities and support workers, 3) new regulations for the "[Packers and Stockyards Act](#)" (PSA) and "[Product of USA](#)" labeling, and 4) increased market transparency through new [market reports](#). Under the new USDA/DOJ [initiative](#), the agencies will develop a streamlined process by February 2, 2022 for concerned producers to submit complaints regarding potential PSA and antitrust violations, in which the agencies state they will "protect the confidentiality of the complainants, if they so request, to the fullest extent possible under the law" and "support[] the strongest possible whistleblower protections." The agencies also state that they will cooperate to share information and case data and that USDA will refer potential PSA violations to the DOJ for antitrust enforcement. The administration began working this past summer on the new regulations and implementing the market reporting and has [previously announced](#) some of the [funding measures](#). In response to the roundtable announcement, North American Meat Institute issued a [press release](#) denouncing the administration's efforts and attributing meat prices to inflation and labor shortages while the American Farm Bureau Federation issued a [statement praising](#) the administration's initiatives, stating that the antitrust reporting system and stronger regulations "will go a long way to ensuring fairness in the industry."

## **White House Says Consumer Meat Price Increases Due to Anti-Competitive Practices in Industry**

On December 10, 2021, the U.S. Department of Labor, Bureau of Labor Statistics released the [November Consumer Price Index](#) and the White House simultaneously released an [analysis](#) of it illustrating that meat prices are the "single largest contributor" to rising home-consumed food costs and that the increases in beef, pork, and poultry prices totaled 25% of the overall increase in food-at-home prices in November. According to the White House, four of the nation's largest, publicly-traded meat processing companies who recently released quarterly financials —Tyson, JBS, Marfrig, and Seaboard—are "[using their market power to increase prices and underpay farmers, while taking more and more for themselves.](#)" The White House countered potential claims that the companies have been forced to raise their prices to offset higher production costs with an analysis of the companies' latest quarterly earnings reports showing that "[\[g\]ross margins are up 50% and net margins are up over 300%,"](#) fueling \$3 billion in shareholder payments throughout the pandemic and recently announced \$1 billion in stock buybacks and new dividend payments.



### U.S. Justice Department Files Suit to Prevent U.S. Sugar from Acquiring Imperial Sugar Company

On November 23, 2021, the U.S. Department of Justice (DOJ), Antitrust Division, filed a [complaint](#) in the U.S. District Court for the District of Delaware under Section 7 of the Clayton Act, [15 U.S.C. § 18](#), seeking to prohibit United States Sugar Corporation (U.S. Sugar) from purchasing Imperial Sugar Company (Imperial). *United States v. United States Sugar Corporation*, No. [1:21-cv-01644](#). In an accompanying press release, DOJ [announced](#) that Imperial's acquisition by U.S. Sugar, a member of the marketing cooperative United Sugars Corporation which establishes prices for all sugar produced by U.S. Sugar and three other sugar producers, would result in just two companies, United and Domino, controlling 75% of all sugar sales in the Southeastern United States. DOJ states that under such a "cozy duopoly" by which "fragile supply chains would be further strained, and American families would pay more for sugar and many staple food and beverage products."

### Antitrust Review Completed of Kraft Heinz Cheese Lines

On November 10, 2021, the U.S. Department of Justice's Antitrust Division [announced](#) the completion of its review of the French dairy company B.S.A. S.A.'s (Lactilis) acquisition of the Kraft Heinz Company's U.S. natural cheese business and filed a [civil antitrust lawsuit](#) in the U.S. District Court for the District of Columbia. The suit demands, via the proposed pre-negotiated settlement agreement, the divestiture of Kraft Heinz's Athenos feta cheese brand and its Polly-O ricotta cheese brand to other buyers in order for Lactilis to achieve U.S. antitrust law compliance for the purchase. Lactilis presently owns the President feta and Galbani ricotta cheese brands. Under the settlement, Athenos will be sold to Emmi Roth USA Inc. and Polly-O to Belgioioso Cheese, Inc., or to approved alternative buyers.

### Broiler Chicken Antitrust Plaintiffs Oppose Defendants' Judgment Sharing Agreement

On October 28, 2021, several *In re Broiler Chicken Antitrust Litigation* plaintiffs filed a [motion](#) in the U.S. District Court for the Northern District of Illinois opposing fourteen defendants' use of a "judgment sharing agreement" (JSA) in which they "agree[d] in advance to their relative responsibility for any antitrust damages awarded at trial against any of them." *In re Broiler Chicken Antitrust Litigation*, No. [1:16-cv-08637](#). In order to effectuate the JSA, if settling, participating defendants must utilize particular settlement agreement language that compels the settling plaintiff to reduce any final judgment in its favor by the respective proportion of responsibility assigned in the JSA to any defendant settling before trial. Of the U.S.'s four largest poultry producers, Pilgrim's Pride (owned by JBS) and Tyson have already settled using the JSA-prescribed settlement language, but Perdue and Sanderson (owned by Cargill) have not yet settled any claims. Among other grounds, the objecting plaintiffs allege the use of this particular JSA is "antithetical to the federal antitrust regime carefully constructed and maintained by Congress." The issue is apparently one of first impression in an antitrust case involving treble damages. If successful in having the use of the JSA prohibited in the case, the prior settlements with Pilgrim's Pride and Tyson, as well as settlements with any other participating defendants, would become void and, if possible, be re-negotiated.

### Court Dismisses Direct Action Purchaser Claims Against Pilgrim's Pride

On October 25, 2021, the U.S. District Court for the Northern District of Illinois issued an [order](#) entering a stipulated dismissal of claims by multiple national grocery chains, including Kroger Co, and Publix Super Markets, Inc. — termed direct action purchaser (DAP) plaintiffs — against Pilgrim's Pride Corporation (Pilgrim's) in the consolidated civil antitrust class action case *In re Broiler Chicken Antitrust Litigation*, No. [1:16-cv-08637](#). Court filings do not disclose if a settlement payment of any kind was agreed to or made. Pilgrim's joins Tyson Foods, Inc. in gaining identical stipulated dismissals in the last week from the DAP plaintiffs in the case. Of the top four poultry processors in the U.S., only Perdue and Sanderson Farms (recently [purchased by Cargill](#) and Continental Grain) remain exposed to claims from the DAP plaintiffs.





### **Court Dismisses Direct Action Purchaser Claims Against Tyson**

On October 18, 2021, the U.S. District Court for the Northern District of Illinois issued an [order](#) dismissing claims of multiple direct action purchasers (DAPs) against Tyson Foods, Inc. in the consolidated civil antitrust class action case *In re Broiler Chicken Antitrust Litigation*, No. [1:16-cv-08637](#). Plaintiffs include, among others, the national grocery chains Kroger Co. and Publix Super Markets, Inc. In response to the parties' stipulation, the court dismissed the claims with prejudice, barring the DAP plaintiffs from further action against Tyson on the same claims. Previously, Tyson agreed to pay \$99 million to settle end-user claims.

### **Minnesota Federal Court Denies All Motions to Dismiss Filed by Beef Packers in Consolidated Civil Antitrust Class Action Litigation**

On September 14, 2021, the U.S. District Court for the District of Minnesota [issued](#) a memorandum opinion and order denying approximately twenty motions to dismiss in a large consolidated civil class action antitrust case wherein multiple plaintiffs allege multiple beef industry participants, acting individually and in concert, committed various anti-competitive practices in violation of various federal laws. *In Re: DPP Beef Litigation*, U.S.D.C. Minn., consolidated to lead case [0:20-cv-01319 – JRT-HB](#). However, the opinion and order remain under seal and have not been released to the public. No portion of the case was dismissed, which means that no defendant was successful in having any portion of the anti-trust allegations against them dismissed and all cases will continue in litigation towards trial, pending possible motions for summary judgment at a later stage. The complaints in the various consolidated cases are public and the named defendants include Cargill, JBS, National Beef Packing Company, Swift Beef Company, and Tyson Foods. Plaintiffs are various class representatives, purchasers, wholesalers and retailers.

### **White House Announces Intent to Address Effects on Consumers, Farmers and Ranchers of Meat Processing Industry Consolidation**

On September 8, 2021, the White House published a policy outline on its official website titled "[Addressing Concentration in the Meat-Processing Industry to Lower Food Prices for American Families](#)" and conducted a [Press Briefing](#) with Agriculture Secretary Vilsack and National Economic Council Director Brian Deese in support. According to the document and Press Secretary Jen Psaki, the administration will address the following: (a) a "corporate consolidation problem with meat-processing giants;" (b) measures to reduce consumer prices and increase farmer and rancher earnings and "create a more competitive food supply chain;" (c) "stepping up antitrust enforcement;" and (d) legislation "to make cattle markets more transparent and fair."

### **Koch Foods and Pilgrim's Pride Executives Charged With Price-Fixing**

On July 28, 2021, a federal grand jury for the U.S. District Court for the District of Colorado returned separate indictments charging Park Ridge, Illinois-based [Koch Foods](#) and [four former Pilgrim's Pride executives](#) with conspiring to rig bids and fix prices for broiler chicken prices. *United States v. Norman W. Fries, Inc.*, No. [1:21-cr-00168](#); *United States v. McGuire*, No. [1:21-cr-00246](#). These charges follow multiple related indictments over the past two years. [According to](#) the U.S. Department of Justice (DOJ), the companies and executives began conspiring as early as 2012 and continued until 2019. For background, see [ALWR—June 12, 2020](#), "Chicken Industry Executives Indicted on Antitrust Charges;" [ALWR—Oct. 9, 2020](#), "U.S. Department of Justice Indicts Six More Poultry Executives Over Alleged Price Fixing;" [ALWR—January 22, 2021](#), "Tyson Agrees to \$221.5 Million Partial Settlement in Poultry Antitrust Class Action;" [ALWR—February 26, 2021](#), "Pilgrim's Pride Pleads Guilty to Poultry Price-Fixing; Fined \$107.9 Million;" and [ALWR—May 28, 2021](#), "Claxton Poultry Indicted on Anti-Trust Charges."

### **White House Executive Order on Competition Features Agriculture Prominently**

On July 9, 2021, President Biden issued an executive order titled, "[Executive Order on Promoting Competition in the American Economy](#)" requiring multiple executive agencies, including the U.S. Department of Agriculture, to assess industry practices, revise or promulgate regulations accordingly and develop and submit plans and analysis addressing topics of competition within their respective industries. The order also creates a White House Competition Council, which includes the Secretary of Agriculture (Secretary), to address unfair "concentration, monopolization,



and unfair competition” in the U.S. economy. Specifically, according to the text of a White House Fact Sheet issued simultaneously, the order:

- “Directs USDA to consider issuing new rules under the Packers and Stockyards Act making it easier for farmers to bring and win claims, stopping chicken processors from exploiting and underpaying chicken farmers, and adopting anti-retaliation protections for farmers who speak out about bad practices.
- Directs USDA to consider issuing new rules defining when meat can bear “Product of USA” labels, so that consumers have accurate, transparent labels that enable them to choose products made here.
- Directs USDA to develop a plan to increase opportunities for farmers to access markets and receive a fair return, including supporting alternative food distribution systems like farmers markets and developing standards and labels so that consumers can choose to buy products that treat farmers fairly.
- Encourages the FTC to limit powerful equipment manufacturers from restricting people’s ability to use independent repair shops or do DIY repairs—such as when tractor companies block farmers from repairing their own tractors.”

The order’s text is much more specific on these tasks and also directs the Secretary of Agriculture:

(1) within 180 days, to submit a plan to promote competition in agricultural industries and to support value-added agriculture and alternative food distribution systems, listing specific means to accomplish those objectives;

(2) within 300 days, in consultation with the Federal Trade Commission, to submit a report on the effect of retail concentration and retailers’ practices on competition in the food industries and means to enhance access to markets; and

(3) submit a report, in consultation with Department of Commerce and United States Patent and Trademark Office, outlining concerns and strategies for increasing competition in the intellectual property system in seed and other input markets.

### **USDA Announces Actions in Response to Executive Order on Competition**

On July 9, 2021, the U.S. Department of Agriculture (USDA) announced several actions in response to President Biden’s “Executive Order on Promoting Competition in the American Economy,” issued the same day. According to the announcement, USDA will initiate three rulemakings under the Packers and Stockyards Act that will: (1) define “unfair,” “deceptive,” and “unjustly discriminatory” conduct that USDA considers a violation of the Act; (2) address unjust practices in the poultry industry; and (3) clarify USDA’s stance that “it is not necessary to demonstrate harm or likely harm to competition in order to establish a violation of the Act.” USDA also states that it will develop a plan to increase opportunities for producers to access new markets and will initiate new labeling rules in accordance with the Federal Trade Commission’s “Made in USA” rule for products regulated by the Food Safety and Inspection Service (FSIS). Additionally, USDA will be requesting comments on how to best utilize \$500 million to improve meat and poultry processing infrastructure and has developed overtime and holiday inspection fee reductions for small meat, poultry, and egg production plants.

**Poultry Antitrust Plaintiffs File Motion to Approve \$1.75 Million Tyson Settlement**

On July 6, 2021, Representatives of the Commercial and Institutional Indirect Purchaser Plaintiffs (CIIPPs) Class filed in the U.S. District Court for the Northern District of Illinois a [motion](#) for preliminary approval of a \$1.75 million class action settlement agreement with Tyson Foods and Hillshire Brands of alleged civil antitrust violations committed in turkey marketing. *Sandee's Catering v. Agri Stats, Inc., et al.*, No. [1:20-cv-02295](#). According to the motion, Tyson will pay \$1.75 million into an escrow account within fourteen days of the court's approval and will provide "meaningful cooperation" to assist the Commercial and Institutional Indirect Purchaser Plaintiffs (CIIPPs) in pursuing their antitrust claims against the remaining defendant companies, including Butterball, Cargill, Hormel, and Perdue.

**U.S. Senate Conducts Hearing on Beef Processing Consolidation and Pricing**

On June 23, 2021, the U.S. Senate on Agriculture, Nutrition and Forestry conducted a legislative hearing titled *Examining Markets, Transparency, and Prices from Cattle Producer to Consumer.* In the wake of recent calls for U.S. Department of Justice Antitrust Division investigations, North American Meat Industry (NAMI) submitted comprehensive [comments](#) in advance stating the processing industry's perspective on price disparity between boxed beef and fed cattle over the last year and consolidation and processing capacity in only four processors accounting for approximately 85% of all U.S. processed beef. [Testimony](#) from the producer perspective included United States Cattlemen's Association and Gardiner Angus Ranch from Overland, KS, and research and academic testimony was provided by experts from Kansas State University and University of Missouri. The hearing covered approximately 2.5 hours and is viewable [here](#).

**Authors**

Audry Thompson, Research Assistant  
Chloe Marie, Research Specialist  
Brook Duer, Staff Attorney  
Ross Pifer, Center Director

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**PENN STATE CENTER FOR  
AGRICULTURAL AND SHALE LAW**

329 Innovation Blvd., Suite 118  
University Park, PA 16802  
Phone: 814-865-4290  
Fax: 814-865-3851  
Website: [AgLaw.psu.edu](#)

**PROFESSIONAL STAFF****Center Director**

Ross H. Pifer  
[rpifer@psu.edu](mailto:rpifer@psu.edu)

**Staff Attorney**

Jackie Schweichler  
[jks251@psu.edu](mailto:jks251@psu.edu)

**Staff Attorney**

Brook Duer  
[dhd5103@psu.edu](mailto:dhd5103@psu.edu)

**Research Specialist**

Chloe Marie, LL.M.  
[cjm445@psu.edu](mailto:cjm445@psu.edu)

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