



September 17, 2025

Dr. Jennifer Tucker
Deputy Administrator
National Organic Program
United States Department of Agriculture
1400 Independence Avenue SW
Mail Stop 0268, Room 2648-S
Washington DC 20250-0268

RE: Legal complaint and request for action regarding conflict of interest exhibited by California Certified Organic Farmers, Inc., and failure to identify animal cruelty under livestock care and living conditions regulations

Dear Dr. Tucker,

It is the position of OrganicEye that CCOF and its Certification Services are failing to enforce the intent of Congress and letter of the OFPA as evidenced by numerous actions – and inactions – regarding the management, health, and welfare of dairy cattle in the care of certified organic operations under the name of Alexandre Family Farm (NOP ID 5561000977), co-owned by Blake and Stephanie Alexandre.

We request that your office investigate the activities of CCOF Inc., CCOF Certification Services, LLC, and certified organic operator Alexandre Family Farm, which together or independently, through numerous actions and inactions, failed to enforce the intent and letter of the OFPA regarding the management, health, and welfare of dairy cattle in the care of Blake and Stephanie Alexandre, other family members, management, and employees.

CCOF Certification Services has had a 22-plus-year relationship with Alexandre Family Farm, first certifying the operation June 26, 2003. Stephanie Alexandre, co-owner of Alexandre Family Farm, sat on the CCOF Board of Directors for 10 years and continues on one of its advisory panels.

The CCOF Board of Directors determines who will serve on the Certification Services Management Committee. In essence, Ms. Alexandre was on the board that selects and hires the Certification Services management team, which then is responsible for directly overseeing the certification process of her operation, Alexandre Family Farm.

This illustrates why, for good reason, there should be clear and distinct separation between advocacy and certification entities to prevent conflicts of interest. We find it difficult to believe that an accredited certifier with the purported stature of CCOF would NOT have been aware of what appear to be long-term and willful actions that failed to comply with NOP regulations.

NOTE: We filed similar conflict of interest complaints against two other major certifiers (Oregon Tilth in February 2024, and Florida Organic Growers in July 2024) that were dismissed by the NOP without action being taken. It should be noted that the administrative law COI complaint OrganicEye filed against CCOF, in November 2023, has not been acted upon or resolved.

We would encourage your office to once again examine the two NOP complaints against CCOF Inc. and the certified organic operation of Alexandre Family Farm.

A Citizen Complaint – 2022

In October 2022, NOP received a citizen complaint against the Alexandre Family Farm, alleging that “Alexandre starved their cows, did not treat sick cows in order to preserve organic status, and sold sick cows instead of euthanizing them.”

The investigation – NOPC-00009060-23 – was referred to the California Department of Food and Agriculture (CDFA) State Organic Program (SOP) and the response document dated September 21, 2023, stated “Allegations were not substantiated...”

An Industry Activist Complaint – 2024

On April 15, 2024, NOP received a complaint from Farm Forward, a non-profit organization working to end factory farming and promote humane animal treatment within the food industry.

The complaint alleges that, between 2019 and 2023, Alexandre Family Farm violated the USDA organic regulations in 7 CFR Part 205 by contaminating soil with carcasses, using prohibited substances on organic livestock, and causing multiple noncompliant animal welfare instances.

Responses by CCOF and/or Alexandre Family Farm to the 14 allegations of animal abuse and/or cruelty listed in the complaint stated ten of the allegations were confirmed or acknowledged by CCOF and/or Alexandre, three were confirmed not to have occurred or were denied by CCOF and/or Alexandre, and one was not addressed at all.

New Allegations Uncovered by OrganicEye

We would suggest that the aforementioned allegations of illegalities, which have already been adjudicated, along with the new points listed below indicate a gross breakdown in the supervision of the certifier and failure by the USDA and California organic programs

to accredit and audit certifiers, as well as an inappropriate dependence on the certifiers to investigate and apply penalties to their paying “clients.”

Allegations that have either not been investigated or appear to have been inadequately investigated, based on documents obtained through the Freedom of Information Act (though heavily redacted and claiming that normal operations on a dairy farm are “confidential business information” – for which an appeal will be filed and subsequently litigated, if necessary), include:

1. The cumulative record of illegally withholding treatment to remediate serious health problems, resulting in pain and suffering and, in some cases, death, in an apparent effort to maintain the organic status of the animals.
2. Multiple issues at Reservation Ranch (farm leased/managed by Alexandre):
 - Farming/grazing on land that had not completed the required three-year transition since being treated with prohibited, toxic agrichemicals. The land had historically been rotated in the production of flower bulbs (lilies).
 - Allegations that milk was shipped from this farm to be made into organic cheese before the cows had completed their transition.
 - Testimony indicating the operators brought in conventional silage to feed the organic herd.
3. Grossly overcrowding approximately 900 milk cows in the free stall barn with 353 stalls at one of their dairies.
4. Reports of the use of Land O Lakes brand conventional colostrum.
5. Selling cattle in Petaluma, California, with 8-9 hours in transport time.
6. Alleged tetracycline (antibiotic) use to treat endemic problems with hoof rot. (FOIA documents seem to indicate CCOF strictly took the word of the operator despite testimony from eyewitnesses.)
7. Allegations from witnesses that one of the farm owners, Stephanie Alexandre, a former CCOF board member, received advanced notice of the inspection before at least one “unannounced” inspection by CCOF at Cedarville, California.

The above issues were cataloged by OrganicEye researchers after interviewing five California residents who had first-hand knowledge of the events in question. Federal law enforcement officials at the USDA would have the ability to compel interviews and conduct them under oath. Our staff did not have that power to confirm these allegations, although receiving the same information from numerous unrelated parties leads us to believe that many, if not all, are valid.

Inspections Between July 2022 and June 2024

In response to the NOP complaint submitted in April 2024, the Alexandres submitted a list of 15 inspections and audits that took place between July 2022 and June 2024 as

proof they were in compliance with the certification requirements, including those of CCOF Certification Services. (See the *NOPI-LS-00240-2024, Alexandre Family Farms: Report of Investigation* completed Nov. 5, 2024, linked at the end of this document, for details of the inspections and results.)

CCOF Certification Services conducted three inspections during that period and, according to the Alexandres, all three CCOF inspections found the farm operations in compliance, including the third CCOF inspection, dated June 3-5, 2024, which was unannounced, and resulted in “feedback to Alexandre in letter.”

CCOF submitted a similar list of inspections and audits that indicated CCOF Certification Services had conducted three annual inspections and two unannounced inspections during that time period. Most telling is the description of the unannounced inspection that took place June 3-5, 2024, which listed 18 items of concern or discussion. (NOTE: Of the 18 items, 10 were partially or completely redacted in the Report of Investigation.) As a result of this inspection and “*due to systemic failures found at Alexandre, they received a Combined Notice of Noncompliance and Proposed Suspension from their certifier, CCOF.*”

OrganicEye finds it notable that the legally required annual inspections reported by CCOF included no findings of any import, and yet, the unannounced inspection in June 2024 produced multiple findings, including those of non-compliance.

Settlement Agreement Between CCOF and Alexandre Family Farm

The June 2024 unannounced inspection generated a condition for on-going certification: a Settlement Agreement between CCOF and the Alexandres that allowed Alexandre Family Farm to remain certified organic. The Settlement Agreement (SA), dated Feb 16, 2024, and effective for 2 years, included:

- One unannounced inspection per year during the SA to evaluate compliance with § 205.238 Livestock care and production practices standard and § 205.239 Mammalian and non-avian livestock living conditions
- Quarterly submission of healthcare treatment records during the SA
- Quarterly submission of cull cow records including all animals culled, reasons for culling, and culled as organic or nonorganic during the SA
- All healthcare practices and protocols for animal living conditions per the OSP must be followed.
- Animals treated with diesel fuel for fly control would no longer be considered organic.

There was no evidence that the NOP conducted any investigation into the propriety of the certification oversight provided by CCOF that failed to uncover the long-term, diverse, and widespread violations of the federal organic standards.

Merely requiring two years of monitoring and oversight by CCOF is profoundly inadequate considering the number of previous years CCOF has inspected Alexandre Family Farms and found nothing to criticize.

It is obvious that CCOF and other certifying/evaluation agents inadvertently or intentionally overlooked or discounted horrendous abuse, flagrant soil and water contamination, and ongoing use of prohibited substances on organic livestock.

How is it possible that management of thousands of dairy cattle by a “highly respected” organic dairy could result in hundreds of photos and videos collected over several years that document appalling animal abuse and the use of illegal synthetic substances in violation of federal organic standards? Especially when that dairy operation is certified and inspected by a widely recognized list of national and international organizations, including CCOF Certification Services?

All these programs require “boots on the ground” in the form of inspectors, auditors, verifiers, and moderators who have made numerous announced and unannounced visits to what is now an operation comprising 9,000 acres and 8,000 head of cattle, of which approximately 4,500 are milked twice daily. It seems unlikely that all of these specialists, paid to inspect, audit, or verify, failed to witness any animal abuse unless they had been directed to areas where they weren’t likely to see any untoward behavior.

We have to ask whether the “guardians” that Congress, through the Organic Foods Production Act (OFPA) of 1992, put in place can ensure organic certifications deliver on their promise of protection or assurance.

OrganicEye questions the effectiveness of certain accredited certifiers and asks if their failure to witness the abuse at Alexandre Family Farms could be due to one or more of the following conditions:

- Auditor competence, independence, or simple disagreement with certain requirements
- Individual and systemic conflicts of interest
- Systemic problems with unqualified inspectors
- “Drive-by,” hurried, and inadequate inspections
- “Tick-box” mentality – meeting minimum requirements rather than genuinely integrating ethical or sustainable practices

Now is the time to hold certifiers accountable for their actions. There is an inherent and illegal conflict of interest in the organic industry when operators choose and compensate their own certifiers, develop close personal relationships with them (including serving on their governing boards), and, in some cases, illegally compensate them over and above certification fees.

Conclusion

CCOF's relationship with its former board member, Ms. Alexandre, and the subsequent sweetheart deal they were offered by CCOF to resolve numerous violations of law without fines or substantial penalties warrant investigation by USDA Agricultural Marketing Service (AMS) sworn law enforcement officers who are qualified to take testimony under oath regarding alleged and confirmed illegalities.

The NOP's standard operating procedure of delegating investigations of corruption and violation of federal standards to the certifiers – which are being compensated by the operations under investigation as clients and could potentially be culpable as co-conspirators or through negligence – is unacceptable and has been an ongoing problem.

Allowing this to happen has resulted in egregious abuse of thousands of dairy cows managed on a farm that has been held up as an exemplar of organic, regenerative, and humane farming practices.

The NOP certainly applied no serious penalties to either CCOF or Alexandre Family Farm for what were apparently willful violations of the law. In fact, the NOP defaulted to the certifier – CCOF – to provide development and management of the Settlement Agreement between Alexandre Family Farm and CCOF.

It is OrganicEye's belief that Alexandre Family Farm ownership and CCOF management and staff involved in standard inspections, investigations and auditing, should be investigated and deposed under oath because there was no evidence that the NOP conducted any investigation into the propriety of the certification oversight provided by CCOF that failed to uncover the long-term, diverse, and widespread violations of the federal organic standards that were ultimately identified.

It appears that, until they had a list of potential infractions in hand — provided by citizen and industry whistleblowers — CCOF's annual inspections produced "toothless" results, identifying only minor infractions, if any at all.

The Alexandres should be investigated and deposed under oath because they have a known history of presenting a sanitized "show farm" to inspectors, have instructed employees to "clean up" areas to be inspected, and have presented themselves as complying with all animal welfare requirements – in print or video – while, in actuality, admitting to more than 70% of allegations in the final NOP investigation report.

It should be emphasized that research relating to other NOP accredited certifiers indicates that the same type of conflicts of interest exists elsewhere.

Please keep us informed of the status of this request.

Sincerely,

Mark A. Kastel
Executive Director

OrganicEye
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La Farge, WI 54639

To simplify your access to information, we provide the following documents containing facts and commentary that relate to this request:

- **The Anatomy of an (Organic) Scandal: Alexandre Family Farm and Certifier CCOF**, an investigative report by OrganicEye that points to actions and inactions by California Certified Organic Farmers that resulted in inadvertent, accidental, or intentional failure to observe and identify violations of the Federal Organic Standards. (**Attached to this document.**)
- *NOPI-LS-00240-2024, Alexandre Family Farms: Report of Investigation* completed Nov. 5, 2024, in response to a complaint filed April 15, 2024, by Farm Forward, an investigative watchdog focused on farm animal welfare, ending factory farming, advancing sustainable agriculture, and promoting conscientious food choices. (Available at: https://www.farmforward.com/wp-content/uploads/2025/06/2025-AMS-00015-F-Final-Response-Records_Redacted.pdf)
- *Dairy Deception: Corruption and Consumer Fraud at Alexandre Family Farm*, an investigative report conducted by Farm Forward that uncovered systemic deception, cruelty, and animal abuse. (Available at: <https://www.farmforward.com/publications/dairy-deception-corruption-and-consumer-fraud/>)
- *The Failure of Organic & Animal Welfare Certifications: A Case Study of Alexandre Family Farm by Farm Forward*, an analysis that “illuminates the legal and regulatory exceptionalism at work in animal agriculture, where actors at every level – federal and state organic agencies, local law enforcement, the state veterinarian, the commercial entities that sourced its products, nonprofit welfare certifiers, and privileged industry interests – fail to protect animals and disempower the public from making more informed, humane purchasing decisions.” (Available at: <https://www.farmforward.com/publications/the-failure-of-organic-animal-welfare-certifications/>)
- "The Suffering Behind 'Humane' Organic Milk," The Atlantic, April 12, 2024, reports on systemic animal abuse and neglect at Alexandre Family Farm, a certified organic and "Certified Humane" dairy in California. The investigation, primarily based on the report by the advocacy group [Farm Forward](#), raises broader questions about the systemic failures of organic certification and the oversight of "humane" farming certifications. (Available at:

<https://www.theatlantic.com/ideas/archive/2024/04/alexandre-farms-treatment-of-animals/677980/>)