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The Anatomy of an (Organic) Scandal: Alexandre Family Farm and USDA-Accredited Certifier, CCOF

Years of horrendous animal welfare violations, alleged antibiotics use, and coating cows with diesel fuel for fly control, after dozens of inspections

— hiding in plain sight

In 2024, both an advocacy group, Farm Forward, and *The Atlantic* magazine reported on instances of severe animal abuse discovered at Alexandre Family Farm, located in Crescent City CA. Subsequent investigations by OrganicEye raised serious concerns about the oversight of the USDA, the operation's certifier, CCOF, and the management of a myriad of additional add-on certification labels that were, theoretically, scrutinizing Alexandre Family Farm and its products.

Alexandre Family Farm, owned by Stephanie and Blake Alexandre, is a corporation in Northern California that operates across 20-plus organic certified leased or managed sites, hay and heifer operations, an egg production operation, and an associated dairy processing plant, all the while promoting proprietary dairy and egg brands. The farm's milk is sent to seven different processing facilities, including one that is owned or leased by the Alexandres and two others that process under the farm's label.

Alexandre Family Farm was originally certified organic in June 2003 and has been continually certified by CCOF (California Certified Organic Farmers) since. (For the purposes of this paper, Alexandre Family Farm will be referred to as "Alexandre" going forward.) In 2021, Alexandre – also a financial supporter of the Rodale Institute, one of the founding members of the Regenerative Organic Alliance (ROA) and creator of the Regenerative Organic Certified® program – became the first Regenerative Organic Certified® (ROC) dairy farm in the United States.

Note: The Regenerative Organic certification is an "add on" certification built on top of the USDA Organic certification.

Around the same time, Alexandre first displayed the Humane Certified logo on their website and announced an additional "feel good" certification: Savory Institute's Land to Market Program certification.

The <u>Certified Humane program</u> claims, "When you see the Certified Humane® Raised & Handled logo on a product, you can be assured that the food products

have come from operations that meet precise, objective standards for farm animal treatment."

The <u>Land to Market program</u> claims that it is, "The gold standard for land health. The leader in regenerative agriculture, Land to Market is the world's first outcomes-based verified regenerative sourcing solution... When you see the Land to Market verification seal on products in the marketplace, you can know that product came from land that is verified as regenerating."

In addition to its longstanding dairy operation, Alexandre also operates Alexandre Kids Eggs. In 2023, Alexandre, DBA Alexandre Kids Eggs, first appeared in the Real Organic Project list as a certified organic farm and began using the Real Organic Project seal on their website. The Real Organic Project seal appears (without qualification) in the scrolling logos at the top of Alexandre's "Our Certifications" web page; an inconspicuous disclaimer clarifying that it only applies to their egg operation is found in the text further down on the page.

Note: The Real Organic project is an "add on" certification built on top of the USDA Organic certification.

The Long Game Pays Off and Borrowed Credibility Creates a Halo Effect

Building credibility and gaining respect can take time, but when an aura of credibility is needed fast, there are ways to expedite that. When it comes to crisis management/damage control – after whistleblower allegations of animal abuse, for example – it can be quickly achieved by "borrowing" on the credibility of past and current associations, thus creating a halo effect. This can be done through leveraging:

- Awards and certifications
- Partnerships or collaborations with established businesses and organizations
- Endorsements from industry experts and influencers
- Unpaid media and press coverage
- A cultivated appearance of transparency
- Well-designed websites and professional branding

In 2006, Stephanie Alexandre joined the CCOF Board of Directors (the nonprofit controlling the organic certifier for Alexandre). Her tenure, which ended in December 2016, overlapped with Mr. Alexandre's *first* membership on the California Department of Food and Agriculture (CDFA) California Organic Products Advisory Committee (COPAC), from 2007 through 2012.

Ms. Alexandre claimed to have served on the CDFA COPAC as well in her bio for a TEDx talk in 2021. However, that membership cannot be confirmed, nor does it seem to be mentioned in any later bios found online.

The California Organic Products Committee advises the CDFA Secretary on issues related to organic standards and enforcement, and on support for organic agriculture in California through education, outreach, technical assistance, and other industry activities. (The Alexandre's dairy operations would later be investigated by both bodies.)

In May of 2018, an industry publication, Ag Alert, published the Alexandre Family Farms receipt of the OTA's Organic Farmer of the Year award. Included was a statement of Ms. Alexandre's position as an advisor to the CCOF Future Organic Farmer Grant Fund (founded in 2014). In 2021, that same claim was made in her bio for a TEDx talk. Because the Future Organic Farmer Grant Fund list of advisors is not published, we have no way to confirm current participation.

In January, 2024, Mr. Alexandre was also <u>asked to serve</u> on a 13-member (later 14-member) <u>Regenerative Agriculture Work Group</u> to assist the State Board of Food and Agriculture in defining regenerative agriculture for state <u>policies</u> and programs. The final draft was considered by CDFA staff in January 2025.

CCOF Potential Conflict of Interest

Note that the CCOF website, on <u>September 28, 2006</u>, clearly stated that the CCOF Certification Services, LLC Management Committee is the governing body that operates the certification business enterprise. Management Committee members are appointed by the CCOF, Inc. Board of Directors for three-year terms.

The CCOF Board of Directors – on which Ms. Alexandre sat for 10 years – determines who will serve on the Certification Management Committee. The responsibilities of the Certification Services LLC – under the supervision of the Management Committee – include:

- Overseeing the certification process
- Reviewing and approving applications
- Making certification decisions
- Ensuring program integrity
- Managing waivers and reductions
- Adjudicating enforcement actions

In essence, Ms. Alexandre was on the board responsible for selecting and hiring the management team, which was then responsible for directly overseeing the certification process of the Alexandre operation.

Multiple former employees have told OrganicEye investigators that, even after leaving the CCOF board, Ms. Alexandre was tipped off by the certifier that an "unannounced" inspection would be forthcoming subsequent to the filings of formal complaints against the dairy operation.

NOTE: OrganicEye has a formal legal complaint pending against CCOF, after contacting the USDA Office of Inspector General alleging gross violations of the enabling statute and regulations prohibiting conflicts of interest by certifiers.

Blake Alexandre was a member of the California Agricultural Leadership Program (Class 22), Del Norte County Fair Board, Northcoast Regional Land Trust Board, and California State Farm Bureau Board. He currently sits on the Del Norte County Resource Conservation District and the Humbolt County Farm Bureau Board. Mr. Alexandre is serving his second term on the California Department of Food and Agriculture organic advisory committee, with this term set to expire at the end of October 2025.

Joseph Alexandre, eldest son, manages their Humbolt County farms in Ferndale and Eureka. In 2021, he became President of the Humboldt County Farm Bureau Board, and a member of the Salt River Watershed Council, Eel River Groundwater Working Group. He also sits on the board of the Northcoast Regional Land Trust.

Christian Alexandre, Farming and Trucking Manager, represents the family on the California FFA State Agricultural Advisory Committee and the American Pastured Poultry Producers Association Board, where he is currently President.

Vanessa Alexandre, Del Norte Dairy Manager, represents the family and business on the boards of the Del Norte County Fair, Del Norte Resource Conservation District, Del Norte Farm Bureau, and Western Organic Dairy Producers Alliance (WODPA)., She is also the Del Norte County 4-H dairy leader.

Obviously, the Alexandre family has worked hard to earn friends in high places and garner influence. Ironically, former employees told OrganicEye investigators that, on the very day a large number of animals died as a result of a stampede subsequent to their not having access to feed (documented in the Farm Forward report and confirmed by a USDA-sanctioned investigation), Blake and Stephanie Alexandre were both out of state accepting the "Organic Farmer of the Year" award from the lobbyists at the Organic Trade Association (OTA).

Certification Inconsistencies — Revocations, Reinstatements, and Misrepresentations



California Certified Organic Farmers (CCOF), Alexandre's accredited organic certifier, has certified the dairy operation since 2003.

After initially investigating Alexandre, pursuant to a number of complaints filed, CCOF found the dairy in full compliance. Subsequently, in 2025, after additional complaints were filed with the USDA and California regulators, and after an additional investigation and interview with the

Alexander's confirming serious animal welfare incidents and other violations of federal

law, CCOF entered into an agreement with the dairy for continued operation, on probation, without fines or substantial penalties, after certain modifications and commitments were made.

CCOF also partners with the Regenerative Organic Certified and Certified Grass-Fed Organic Livestock programs to provide combined management of certifications that save organic operations time and money.

CERTIFIED HUMANE

Certified Humane program removed Alexandre from their "Who's Certified?" list on or about April 29, 2024. The certification was apparently reinstated sometime between August 23 and September 5, 2024. (The dates are approximate because the Internet Archive does

intermittent website captures, rather than every time a change is made to a site.) It appears that Alexandre continued to display the Certified Humane logo on their website during the time in which the certifier had removed their name as a certified dairy operation.

Humane Farm Animal Care publishes a document titled *Program Policy Manual* that outlines use of the Certified Humane Raised & Handled logo/seal in detail. No mention is made of the use of the seal in marketing materials when an operation's certification has been suspended.



TOP RATED

CORNUCOPIA

Alexandre's **Regenerative Organic Certified** (ROC) certificate was suspended in February 2024 and again on March 4, 2025, after which the Regenerative Organic Alliance (ROA), on May 29, 2025, requested an additional inspection to lift the

suspension. ROA maintained Alexandre on their <u>certified list</u> throughout the suspension and the brand's packaging and website continued to display the ROC logo during the period the certifier had announced the suspension.

ROA publishes a document titled *Labeling Guidelines & Terms of Use* that outlines use of the ROC logo/seal in detail. No mention is made of the use of the seal when an operation's certification has been suspended.

Note that CCOF, Alexandre's NOP organic certifier since 2003, also provides Regenerative Organic Certified certification services. CCOF can bundle the two together to streamline inspections and reviews and simplify the process of managing multiple certifications. In other words, CCOF inspectors have the ability to simultaneously act as ROC inspectors.

Cornucopia Institute publishes 12 scorecards rating and ranking organic producers, processors, and manufacturers with the intent of providing information to consumers for making informed purchasing decisions.

Their Organic Dairy Scorecard includes this disclaimer: "As of June 2024, Alexandre Dairy has been suspended from our scorecard until we complete our

investigation." However, Alexandre continued to display the Cornucopia ratings logo on their nationally distributed yogurt (it is unknown how many other stock keeping units (SKUs) continue the practice). OrganicEye last confirmed this at the time of the publication of this paper in September 2025.

Alexandre Kids Eggs remains listed without disclaimer on the Cornucopia Organic Egg Scorecard.

Their "Top Rated" seal has also appeared on the Alexandre <u>website</u> without interruption and without noting that only Alexandre Kids Eggs qualify for top rating on the Scorecard.

Cornucopia Institute does not appear to publicly offer any manual or guide that outlines the use of the "Top Rated" logo/seal in marketing materials.

Alexandre also currently appears – for both eggs and dairy – on Cornucopia's Independent Organic Brands list. The company's first appearance on the list appears to have been in December 2023. Cornucopia describes the list as consisting of "gems in the marketplace," without any associated measure of quality, responsibility, or transparency. The requirements for listing are:

- A certified organic brand
- Independently owned
- Committed to selling exclusively certified organic products



Real Organic Project (ROP) has <u>certified Alexandre Kids Eggs</u>, but not their dairy or pasture operation. As previously noted, Alexandre prominently displays the ROP logo on their website with only a very inconspicuous disclaimer that Real Organic Project certification only applies to their egg operation. This could potentially lead website visitors not paying close attention to assume that their dairy products also qualify.



The Organic Plus Trust (OPT) **Certified Grass-Fed Organic Livestock Program**[™] is an "add on" certification to the NOP Organic Certification program and is managed by several certifiers, including CCOF (Alexandre's certifier), assuring compliance with 100% grass-fed livestock management (only applicable to a percentage of the Alexandre production).

The Organic Plus Trust publishes a document titled <u>Program Manual - Certified Grass-Fed Organic Livestock</u> that outlines use of the Certified Humane Raised & Handled logo/seal in detail. It is explicit that "an expired or surrendered OPT GF Certificate of Compliance is invalid, and all rights thereunder are extinguished" including the OPT Seal licensing agreement. OPT maintains the right to "suspend or revoke any OPT Seal licensing agreement" but does not specifically provide instructions to operations' use of the seal in marketing materials after suspension.



While Alexandre lists **Savory Institute's Land to Market** as one of their certifications, the focus of the program is soil health and environmental impacts of land use and does not specifically measure what those uses are; for example, raising beef and/or dairy cattle.

Savory Institute promotes monitoring of soil health and fertility, carbon sequestration, hydrologic function, and biodiversity carried out by "accredited verifiers and monitors" with deep knowledge of the region measured. The Land to Market seal is meant to provide consumers the assurance that the products bearing the seal are produced on land that is verified regenerative.

It's hard to assure consumers the land is verified regenerative when there is no formal, legally binding definition of regenerative agriculture. The lack of a standardized definition leads to confusion and varying – often conflicting – interpretations of what constitutes "regenerative" practices.

Neither the Savory Institute nor the Land to Market program appears to publicly offer any manual or guide that specifically provides instructions for operations' use of the Land to Market seal in marketing materials after suspension of certification.



Validus Verification Services, a division of organic certifier Where Food Comes From, Inc., is a leading auditing company for the conventional pork, dairy, egg, and poultry industries – not commonly the dairy industry. It is unknown what standards they are verifying.

Validus was involved in the greenwashing campaign undertaken after Mark Kastel and Will Fantle (currently OrganicEye's Executive Director and Board Secretary/Treasurer, respectively) published an investigation into Aurora Dairy, the country's largest "organic" factory farm operator, in 2006. The USDA subsequently found them in "willful" violation of 12 tenets of the federal organic standards. They also settled a consumer fraud class action lawsuit for \$8-\$9 million.

Validus was also involved in the damage control campaign after Fairlife branded milk, now owned by Coca-Cola, was implicated in a series of quite serious and well-documented animal abuse incidents, also subsequently entering into a settlement pursuant to a civil suit.

Validus Verification Services does not appear to publicly offer any manual or guide that specifically provides instructions to operations' use of the Validus logo in marketing materials after suspension of certification.

Investments in Effective Public Relations and Marketing Create a Profitable Brand – Based on Perception/Misperception

The Law of Perception, from the <u>22 Immutable Laws of Marketing</u>, states: "Your most potent weapon in marketing is not the quality of your product, but rather the public's perception of your product. Simply put, perception is reality."

Alexandre, with <u>revenues exceeding \$6 million</u>, is not the bucolic family farm pictured on their website and in their advertising. The home farm in Del Norte County, California, is referred to by OrganicEye intelligence agents – current and former farm staff – as their "show farm."

The fact that they call their far-flung operations a "family farm" would be a misnomer in the lexicon of most experts involved in agriculture. They have scores of employees, operating at least 6-8 different facilities of which a number of managers have told us the owners might not be physically present more than once a year.

[Note: It should be noted that most owners of "factory farms" adamantly argue that they are "family farms" based on the ownership structure, not how the facilities are managed.]

One of the largest organic dairy organizations in the country, Alexandre has a massive footprint and – based on two published reports – raises 4,500 crossbred milk cows on 5,800 acres of irrigated pasture. The total number of cattle on their multiple operations is approximately 8,000 head, including milk cows and young stock, and the total acreage comprises about 9,000 acres. They operate five dairies in Del Norte and Humboldt counties and own 2,000 acres of cropland producing hay in Modoc County.

However, these numbers don't reconcile with the fact that Blake Alexandre lobbied other organic dairy producers around the country, when the farming community was attempting to persuade the USDA to implement tighter grazing restrictions in an effort to clamp down on factory farm abuses, for four cattle per acre (higher than anyone else in the country felt feasible). Mr. Alexander at the time claimed that the climate where he was located would support that high stocking level.

A national survey of organic dairy producers conducted by Mark Kastel pegged the average family farm producing organic milk as having a stocking level of one cow per acre.

The intent of the operation's marketing and media efforts clearly has been to position Alexandre as an exemplar (a faultless example to be emulated or a perfect typification, per <u>Merriam Webster</u>) of organic, regenerative, and humane farming practices.

As a result of their efforts, Alexandre began generating a flurry of positive publicity beginning in 2021 and continuing to the present day, including coverage by organizations such as <u>Forbes</u>, the <u>Today Show</u>, <u>Civil Eats</u>, the <u>Organic and Non-GMO Report</u>, and <u>Time</u> magazine. In 2022, the opening episode of celebrity chef <u>Guy Fieri's All-American Road Trip on the Food Network</u> featured Alexandre Family Farm.

As recently as June 17, 2025, a podcast, <u>GroceryPulse</u>, put a positive spin on the farm in an industry puff piece produced by a marketing agency, Innovar Marketing, for a small independent grocery, Goodwin's Organic Foods. An hour plus in length, the Alexandre's again "borrow" credibility by expounding on their exemplary behavior as dairy farmers and livestock managers.

However, at the same time the storm of positive coverage was converting reality to perception, whistleblowers started calling out horrific abuse of Alexandre's cattle across their northern California dairy operations. According to Farm Forward, the first of multiple whistleblowers approached their staff in December 2022 with uncorroborated complaints about Alexandre Family Farm.

By the end of 2023, numerous additional whistleblowers had come forth verifying and expanding the original allegations, eventually providing hundreds of videos and photos and more than a dozen signed affidavits.

On April 11, 2024, Farm Forward published <u>Dairy Deception: Corruption and Consumer Fraud at Alexandre Family Farm</u>, delivering in vivid detail more than two years of research and investigation into the cruelty and abuse of dairy cattle by Alexandre Family Farm.

The Atlantic magazine quickly followed on April 12, 2024, with publication of <u>The Truth About Organic Milk</u>, which condemned not only Alexandre's management and care of their cattle, but also the USDA's National Organic Program (NOP) for its inefficiency in assuring the American public that certified organic operations were in compliance and, by law, managing their cattle in a humane manner.

Author Annie Lowrey wrote, "...the USDA does administer the National Organic Program, which mandates that animals have 'sufficient nutrition,' are given 'medicines to minimize pain, stress and suffering,' and are 'fit for transport' when they are sent to slaughter. But the NOP is mainly aimed at environmental stewardship. Its humane standards are low, and sometimes counterproductive. The program's restrictions on the use of antibiotics, for instance—intended to prevent farmers from providing the drugs prophylactically, which facilitates overcrowding and contributes to antibiotic resistance—leads farmers to withhold medicine from sick animals, too. That's particularly cruel for newborns and recently delivered mothers, who are especially vulnerable to infection."

Allegations of Abuse

In April 2024, Farm Forward sent the NOP a <u>letter of complaint</u> alleging that Alexandre, headquartered in Crescent City, California, had committed "...many severe animal welfare violations over the past five years..." Farm Forward also requested that NOP "...investigate the failure of the California Department of Food and Agriculture (CDFA) to report any such violations when CDFA was asked to investigate the operation..."

The NOP's <u>Final Response states</u> that the complaint alleged that Alexandre, which is certified by CCOF Certification Services, LLC. (CCOF), "between 2019 and 2023 violated the USDA organic regulations at 7 CFR Part 205 by contaminating soil with carcasses, using prohibited substances on organic livestock, and multiple noncompliant animal welfare instances."

Warning: The <u>Linked Photos</u> and Following Bullet Points Include Graphic Descriptions of Animal Abuse

Specifically, the complaint alleged the following:

- Hip lifters were used to move, or drag, non-ambulatory animals on at least 2 occasions.
- Approximately 800 animals that were 3-4 years of age were dehorned by cutting with no pain minimization.
- Approximately 80 pregnant heifers were euthanized because, "heifers were so skinny and their calves were so big that the heifers couldn't successfully calve."
- A non-ambulatory cow was denied care for approximately two weeks.
- A calf was stuck in a headlock for approximately three days, injured herself, and was without water
- One cow's teat was cut off with a dirty pocketknife and without pain minimization.
- One cow was stuck in a feed trough and died.
- There was no routine hoof care for lameness and foot rot.
- Animals sick, injured, lame, or unfit, were loaded for transport to move them
 to auction, or sale. These animals were described as having cancer eyes, eye
 infections or injuries, injured legs, poor body condition, weak, lame, and with
 spinal cord injury.
- Salt was used on eyes with patches to heal eye illnesses.
- Diesel fuel with mineral oil was sprayed on livestock for fly prevention.
- Tetracycline was used on hooves as a topical treatment.
- Dead animals were "composted" in pastures where livestock grazed.
- In addition, the complainant alleged that in 2018, the year Alexandre Family Farm won the Organic Trade Association's Organic Farmer of the Year award, approximately 40 cows were trampled and killed and 20 more were injured when 800 animals rushed to eat after being without feed for several days.

New Allegations Uncovered by OrganicEye

Based on testimony from five different dairy professionals with direct knowledge of past and current practices at the multiple dairies owned by Alexandre Family Farm, we have submitted a request to the USDA Office of Inspector General that an investigation be opened into the conduct of not only the dairy but the National Organic Program, California Department of Food and Agriculture (CDFA), and California Certified Organic Farmers (CCOF).

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. <u>Multiple issues at Reservation Ranch (farmland leased/managed by Alexandre):</u> 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 parties makes us believe that many, if not all, are valid.

Inspections and Audits: Dates and Results Provided to the NOP in Response to the Farm Forward Complaint

Following is a list of inspections and audits provided to the NOP by Alexandre during the period of the NOP's investigation of a complaint submitted April 15, 2024, by Farm Forward, an organization committed to "holding the meat industry, retailers, and policymakers accountable to most Americans' desire for a healthy and humane food system."

This information was submitted to the NOP by the Alexandres attempting to prove they were in compliance with the certification requirements measured as part of the various certification programs. Please note these inspections and audits took place between July 2022 and June 2024.

CCOF Certified Organic

Sept 18-19, 2023: Compliant, Annual inspection
Nov 28, 2023: Compliant, Unannounced inspection

June 3-5, 2024: Compliant, Unannounced inspection, feedback to Alexandres in letter

• ROA Regenerative Organic Certified (ROC)

May 4, 2024: Suspended

May 29, 2024: Requested additional inspection to lift suspension

• Organic Trust Plus Dec 20, 2023: Passed

Certified Humane

July 7-9, 2022: Passed March 25, 2024: Passed May 2-4, 2024: Passed

National Milk Producers Federation animal welfare "FARM" Program

March 19, 20, 2024: Passed, Unannounced inspection May 9,10, 2024: Passed, Inspected every 3 years

May 28-30, 2024: Passed, Expecting additional unannounced inspection for follow-up

Validus

July 18, 2023: Passed May 15-16, 2024: Passed

California Department of Food and Agriculture (CDFA)

May 2023: Passed

Not One, But Two Investigations by the USDA NOP and One by the CDFA SOP (State Organic Program)

On <u>review of investigation records</u>, the NOP discovered that a related investigation had been filed in September 2023 against the same operation (Alexandre Family Farm) for the same issues. That investigation was closed on September 21, 2023, with the comment that "Allegations were not substantiated; complaint was referred to and investigated by the State Organic Program."

In essence, there was not one investigation, but three; the final being the NOP investigation titled NOPI-LS-00240-2024 (date of complaint 04/15/2024 and investigation closed on 11/05/2024).

The 2024 NOP Complaint included 14 allegations of animal abuse and/or cruelty. Of those, 10 were confirmed by CCOF and/or acknowledged by Alexandre, 3 were deemed not to have occurred or were denied by CCOF and/or Alexandre, and 1 was not addressed.

1. Hip lifters were used to move, or drag, non-ambulatory animals on at least two occasions.

Response: Alexandre **confirmed** that employees were incorrectly moving cows with hip clamps.

2. Approximately 800 animals that were 3-4 years of age were dehorned by cutting with no pain minimization.

Response: Alexandre **confirmed** that animals were to be horn-tipped in 2019, however some animals were inappropriately horn-tipped.

- 3. Approximately 80 pregnant heifers were euthanized because, "heifers were so skinny and their calves were so big that the heifers couldn't successfully calve." **Response:** Alexandre **denied** that body condition of animals was a concern and that animals were euthanized due to being too thin for calving.
- 4. A non-ambulatory cow was denied care for approximately two weeks. **Response:** Alexandre did not have record of a non-ambulatory cow without care for approximately two weeks; however, they did **acknowledge** that the animal was likely on their property [based on voluminous photographic evidence].

5. A calf was stuck in a headlock for approximately three days, injured herself, and was without water.

Response: Alexandre did not have record of a calf stuck in a headlock for approximately three days; however, they did **acknowledge** the photo of the animal was from their farm.

- 6. One cow's teat was cut off with a dirty pocketknife and without pain minimization **Response:** Alexandre **stated** that their protocols have never allowed cutting teats off; however, in 2018 or 2019, an employee cut the teat off an animal with mastitis.
- 7. One cow was stuck in a feed trough and died.

Response: Alexandre **stated** that they were not aware of the animal that died in the feed trough and that the feed manager at the time of the photo was removed in 2018 or 2019.

- 8. There was no routine hoof care for lameness and hoof rot. CCOF **confirmed** that Alexandre animals had severe lameness and hoof rot [causing severe pain].
- 9. Animals sick, injured, lame, or unfit, were loaded for transport to move them to auction, or sale. These animals were described as having cancer eyes, eye infections or injuries, injured legs, poor body condition, weak, lame, and with spinal cord injury.

Response: CCOF **confirmed** that Alexandre transported animals unfit for transport to auction or sale [Illegal in conventional and organic operations].

10. Salt was used on eyes with patches to heal eye illnesses.

Response: There was no response to this allegation.

11. Diesel fuel with mineral oil was sprayed on livestock for fly prevention (materials and procedures banned in organic livestock management).

Response: CCOF **confirmed** that Alexandre used diesel fuel for fly control. Alexandre **acknowledged** that diesel fuel was used for fly prevention. [These toxic petrochemical/hydrocarbon contaminants could enter the milk either through the bloodstream of the animal or having been sprayed and in contact with the utter/teats – although the teats are typically wiped off before milking, they would not use a solvent that could effectively remove diesel fuel.]

12. Tetracycline (an antibiotic banned in organic production) was used on hooves as a topical treatment.

Response: Alexandre **denied** this action and CCOF **confirmed** that Alexandre **did not** have tetracycline onsite in 2023 and 2024. Alexandre **stated** that they had not used tetracycline in over 25 years. [Since testimony by multiple

individuals indicated they were using tetracycline to treat hoof rot, how could CCOF definitively confirm that did not happen?]

- 13. Dead animals were composted in pastures where livestock grazed. **Response:** CCOF **confirmed** that Alexandre **does not** allow animals to graze near cow composting sites; Alexandre is being evaluated by the California Department of Agriculture regarding maintenance of natural resources.
- 14. Approximately 40 cows were trampled to death, and 20 were injured, when 800 animals were fed after being without access to food for several days.

 Response: CCOF confirmed that Alexandre animals were without feed and some animals died from trampling. Alexandre acknowledged that 30 head, not 40 head, died or were euthanized when there was an equipment break down, staff were unavailable, and animals were held in an area that typically did not hold animals.

Settlement Agreement (SA) Between CCOF and Alexandre Family Farm

"Some of the allegations were confirmed by the investigation process and others were not able to be substantiated (what weight was given to the Alexandre testimony/denials, in response to the charges, is unknown). Due to systemic failures found at Alexandre, they received a Combined Notice of Noncompliance and Proposed Suspension from their certifier, CCOF.

Alexandre was required to change multiple practices and procedures, train staff, hire an animal welfare consultant, and correct all noncompliances. Alexandre entered into a Settlement Agreement with CCOF and is receiving additional oversight and monitoring for two years. Alexandre received an unannounced inspection by CCOF in June 2024 and showed correction of substantiated allegations."

Hundreds of cattle faced abuse, cruelty, pain, and suffering at the hands of staff and management of Alexandre at the same time the operation was being presented to the dairy industry as an exemplar of organic, regenerative, and humane farming practices.

The resulting "penalties" were nothing more than one unannounced inspection per year (for a total of 2), quarterly submission of records (rather than an annual audit), an admonition to follow all healthcare practices and protocols, and a reminder that animals treated with diesel fuel for fly control cannot be considered organic.

No fines were levied by the USDA, and the agency left the final dispensation of the matter to the certifier, CCOF, the very organization that should have identified, through their inspections and auditing, all the widespread, long-standing, overt, and apparently willful violations of the law.

The <u>Settlement Agreement</u> effective for 2 years between CCOF and Alexandre Family Farm requires:

- One unannounced inspection per year during the SA to evaluate compliance with organic regulations 205.238 and 205.239
- 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 qualifying for organic or nonorganic slaughter 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 for continued milking or slaughter.

At Least Two Lawsuits

The publication of Farm Forward's <u>Dairy Deception: Corruption and Consumer Fraud at Alexandre Family Farm</u>, delivering in vivid detail more than 15 months of research and investigation into the cruelty and abuse of dairy cattle by Alexandre, and the subsequent publication of <u>The Truth About Organic Milk</u> by The Atlantic, condemned not only Alexandre's management and care of their cattle and the National Organic Program, but drew national attention to the issue.

The result was two lawsuits, one a class action suit charging Alexandre and Certified Humane with fraudulent "humane" claims and the second alleging Alexandre's abuse of hundreds of dairy cattle and calves.

On March 7, 2025, Pease & Ijadi, APC, public interest law firm; Richman Law & Policy, a public interest law firm specializing in food-focused class actions; and Farm Sanctuary, a non-profit corporation founded to combat the abuses of factory farming, advocate for institutional reforms, and encourage a new awareness and understanding of farm animals, filed a class action lawsuit against Alexandre Family Farm and Certified Humane (Case #25CV554, US District Court, Southern District of California), seeking damages exceeding \$5 million for fraudulent "humane" claims or humane-washing (false promises of animal welfare) on Alexandre products.

On September 30, 2024, Janssen Malloy LLC, a nonprofit law firm, and Legal Impact for Chickens, a California non-profit public benefit corporation for the prevention of cruelty to animals, <u>filed a suit</u> against Alexandre in Humboldt County, enforcing California criminal statutes that prohibit animal cruelty – California Penal Code 597 – which covers a range of acts considered to be animal abuse, including failing to provide animals with proper food, drink, or shelter, or failing to give animals proper care and attention.

A Well-Kept Secret

How is it possible that proper management and oversight 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 banned substances such as antibiotics and diesel fuel in livestock management?

Especially when that dairy operation is ROC® certified by the Regenerative Organic Alliance, as well as being certified as part of the Certified Grass-Fed Organic Livestock Program™ by Organic Plus Trust (OPT), Certified Humane® by Humane Farm Animal Care, a certified participant in the Land to Market program by the Savory Institute (note: field data is collected on reference areas and farms by accredited Ecological Outcome Verification (EOV) monitors), and enrolled in FARM Animal Care Program (FARM) by the National Dairy Farmers Assuring Responsible Management Program, among others listed on the Alexandre Family Farm website.

California Certified Organic Farmers (CCOF) has certified Alexandre operations since 2003 and currently offers additional certification programs including ROC® certification and the Certified Grass-Fed Organic Livestock Program in partnership with the Regenerative Organic Alliance and Organic Plus Trust.

Since 2021, at least part of the Alexandre operation has been Regenerative Organic Certified® (the exact amount of acreage is not public information), and Certified Humane. The operation was Land to Market Verified in 2020.

All these programs require "boots on the ground" in the form of inspectors, auditors, verifiers, and moderators. 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. Or these programs have standard protocols that are so profoundly inadequate that bad actors are informed of the inspections in advance and able to hide some of the most egregious violations and abuse.

The <u>CDFA State Organic Program (SOP) investigation</u> of a whistleblower complaint filed in 2022 included "announced audits" of 20 sites scheduled by Alexandre management on May 31 and June 1, 2023.

Day 1 included 6 locations and totaled approximately 40 miles driving. The inspections were centered around Ferndale and Eureka CA. Day 2 comprised 14 inspections in the communities of Crescent City, Smith River, and Klamath CA, approximately 85 miles driving distance.

The final stop of the second day was at a private oceanfront residence listed only by the name Hunter Creek Properties which appeared to bring the inspectors together with the Alexandre family, Stephanie, Blake, and their son Joseph, and key staff in a social setting, likely encouraging camaraderie between those doing the inspections – who should, by law, be free of any conflict of interest – and those being inspected, for whom a "clean slate" was critically important.

Coincidentally, on April 25, 2023, just a few weeks before these announced inspections took place, Gabriel Ettorre, Livestock Compliance Officer, USDA, AMS, NOP, notified

<u>Andrea Cano</u>, Management Services Technician - State Organic Program, CA Department of Food & Agriculture, that:

"The NOP has conducted a surveillance review of and found some animal welfare concerns regarding cattle purchased from Alexandre Dairy.

On page 7 & 12 of the attached report (editor note: not included in the email attachments) you will see documentation of cows that arrived to slaughter either down or condemned. The cows originated from Alexandre Dairy. Just wanted to pass this along to you. Thank you. Gabe"

Is it possible those cattle were removed from one or more Alexandre Dairy Farm locations in advance of the planned inspections?

OrganicEye's Summation: Lies, Damn Lies, and Public Relations

According to the individuals who filed the original formal complaint, the first USDA National Organic Program investigation into whistleblower complaints against Alexandre – which found no wrongdoing – was headed by NOP Lead Compliance Officer Emily Prisco. Ms. Prisco is a former employee of both Dean Foods/Horizon and Aurora Organic, two of the largest "organic factory farm" operators, each managing many thousands of head of cattle at numerous locations. Both of her dairy employers were and are very active members of the industry lobby group, the Organic Trade Association.

OrganicEye's Kastel previously filed formal legal complaints against Dean/Horizon, Aurora, and a 10,000-cow dairy that shipped to Horizon, located in Pixley, California.

Aurora was found by the USDA to be in "willful" violation of 12 tenets of the organic standards. Like Alexandre, they were put on probation and allowed to continue without fines or substantive penalties. However, they were forced to settle a multimillion-dollar class action consumer fraud legal settlement, just as Alexandre is now facing.

Ms. Prisco was the Organic Stewardship Specialist at Aurora's Platteville, CO facility from 2006 to 2008, where she managed USDA National Organic Certifications for farms, oversaw audits, and maintained compliance.

Within the organic dairy community, it is widely believed that these industrial-scale dairies, each milking 1500-15,000 cows, are violating both the spirit and letter of the law. Yet NOP management put someone with that background in charge of critiquing the ethical and legal behavior of all organic dairies in the US.

Multi-year investigations into Alexandre dairy operations, done by numerous state and federal agencies, have proven to be untrustworthy and should be investigated by the USDA Office of Inspector General, with principals deposed under oath.

The National Organic Program's standard operating procedure of delegating investigations of corruption and violation of federal standards to the certifiers, which could either be culpable as co-conspirators or through negligence, is unacceptable and has been an ongoing problem.

Changes Need to Be Made

After more than three years of investigations by both the NOP and the CDFA, along with third-party certification and evaluation reviews by the Regenerative Organic Alliance (Regenerative Organic Certification certifier), Humane Farm Animal Care (Certified Humane certifier), and National Dairy Farmers Assuring Responsible Management Program (FARM), an "evaluator/facilitator" program, the final conclusions and recommendations by the NOP gave Alexandre nothing more than a slap on the wrist and a warning.

The NOP investigation NOPI-LS-00240-2024 - Report of Investigation and Final Response (date of complaint 04/15/2024; investigation closed 11/05/2024), delivered this <u>Conclusion and Recommendation</u>:

NOP Closing of Investigation Conclusion

Some of the allegations were substantiated by the investigation process and some were unable to be confirmed. Due to systemic failures found at Alexandre, they received a Combined Notice of Noncompliance and Proposed Suspension from their certifier, CCOF. Alexandre was required to change multiple practices and procedures, trained staff, hired an animal welfare consultant and corrected all instances of noncompliance.

Alexandre entered into a Settlement Agreement with CCOF and is receiving additional oversight and monitoring for two years. Alexandre received an unannounced inspection by CCOF in June 2024 and showed correction of sustained allegations.

The NOP recommended closing this complaint and sending a Case Closure Notice to the complainant, to the certifier, to the California State Organic Program, and to the operation. The notices for each recipient will outline the results of this investigation and put the operation on notice that future violations may result in the suspension of its organic certification per the settlement agreement. Additionally, the NOP recommended CCOF opening a Case Management System oversight tracking surveillance to monitor the operation's progress through the settlement agreement process to ensure continued compliance.

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.

The NOP applied no penalties to either CCOF or Alexandre for what were apparently willful violations of the law. The only potential consequences are *possible* suspension of Alexandre's organic certification for *future* violations. That is if anyone *catches* them in violation of the organic rules and *files* yet another complaint with the NOP. And *if* Alexandre is found guilty of those violations.

OrganicEye believes this settlement agreement should never have been put into place. It is obvious that CCOF and other certifying/evaluation agents have inadvertently or intentionally overlooked or discounted horrendous abuse, flagrant soil and water contamination, and ongoing use of prohibited substances on organic livestock.

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

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. There is growing awareness of the systemic limitations and potential failures within the National Organic Program.

Questions regarding the effectiveness of certain accredited certifiers include the following concerns:

- 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
- Misuse of certification marks including falsely claiming or misrepresenting products as organic certified

Now is the time to hold the USDA and 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.

CCOF's relationship with its former board member, Ms. Alexandre, Mr. Alexandre's position with CDFA, 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.

Congress intended the rigorous accreditation and auditing requirements under OFPA to mitigate these conflicts. However, audits by the USDA Office of Inspector General and the American National Standards Institute, along with investigations by OrganicEye principals, have proven the NOP oversight to be woefully inadequate.

And in the case of the Alexandre, this has resulted in egregious abuse of thousands of dairy cows managed on multiple large dairies that has been held up as an exemplar of organic, regenerative, and humane farming practices – all resulting in defrauding consumers/theaters seeking authentic organic food.