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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF HUMBOLDT

LEGAL IMPACT FOR CHICKENS, a  
California non-profit public benefit corporation  
for the prevention of cruelty to animals,

Plaintiff,

v.

ALEXANDRE FAMILY FARM, LLC, a  
California limited liability company; BLAKE  
ALEXANDRE; STEPHANIE ALEXANDRE;  
and JOSEPH ALEXANDRE,

Defendants.

CASE NO. CV 24 01841

**COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

**[Corporations Code § 10404 and § 14501]**

(Unlimited Civil Complaint – Code Civ. Proc.,  
§ 88)

**FILED**

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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT

**Table of Contents**

<b>INTRODUCTION .....</b>	<b>3</b>
<b>PARTIES.....</b>	<b>3</b>
<b>JURISDICTION.....</b>	<b>5</b>
<b>VENUE .....</b>	<b>5</b>
<b>FACTUAL ALLEGATIONS .....</b>	<b>5</b>
<b>A. Alexandre Puts Salt in Animals' Eyes. ....</b>	<b>7</b>
<b>B. Alexandre Dangerously Glues Pieces of Old Clothes Onto the Eyes of Cows Suffering     from Apparent Cancer, to Hide Their Illness from Prospective Buyers—and Alexandre     Sometimes Glues Cows' Eyes Shut in the Process.....</b>	<b>8</b>
<b>C. Alexandre Has Been Caught Cutting off a Sick Cow's Sensitive Teat with a Dirty Pocket     Knife. ....</b>	<b>11</b>
<b>D. Alexandre Drags Disabled, Living Cows Across Concrete and Gravel in Clear Violation     of Industry Guidance. ....</b>	<b>13</b>
<b>E. Alexandre Has Been Caught Leaving Calves Alone in Dirty, Isolated Hutches to Die. ..</b>	<b>15</b>
<b>F. Alexandre Starves and Dehydrates Cattle. ....</b>	<b>18</b>
<b>G. Alexandre Deprives its Animals of Proper Veterinary and Hoof Care.....</b>	<b>21</b>
<b>H. Alexandre Improperly Saws Adult Cows' Horns off Their Skulls Without Anesthesia.         22</b>	
<b>I. Alexandre Regularly Transports Sick and Injured Animals to Auction. ....</b>	<b>24</b>
<b>J. Alexandre's Management Carries Out, is Aware of, Condone, Directs, and Participates     in Alexandre's Animal Abuse.....</b>	<b>26</b>
<b>K. Alexandre's Treatment of the Cows and Handling and Management Practices Run     Contrary to Accepted Animal Care or Dairy Industry Standards.....</b>	<b>27</b>
<b>L. Alexandre Has a History of Dishonesty.....</b>	<b>30</b>
<b>M. Alexandre's Animal Abuse is Continuing.....</b>	<b>31</b>
<b>FIRST CAUSE OF ACTION .....</b>	<b>33</b>
<b>SECOND CAUSE OF ACTION .....</b>	<b>38</b>
<b>PRAYER FOR RELIEF .....</b>	<b>39</b>

Legal Impact for Chickens, a California non-profit public benefit corporation for the prevention of cruelty to animals, alleges herein as follows:

## INTRODUCTION

1. This is an action to remedy the ongoing abuse and neglect of cattle at a mismanaged dairy operation in Humboldt County and Del Norte County, California.

2. The defendants, Alexandre Family Farm, LLC; Blake Alexandre; Stephanie Alexandre; and Joseph Alexandre (collectively, “Alexandre”) have a pattern and practice of animal abuse. Alexandre has been caught intentionally pouring table salt into animals’ eyes; dragging disabled cows across concrete; leaving calves to die while isolated in small, filthy, individual hutches; depriving cattle of food and water; and more.

3. Alexandre's abhorrent actions violate California's anti-cruelty laws.

4. Plaintiff Legal Impact for Chickens therefore brings this action under Corporations Code Sections 10404 and 14501, for declaratory and injunctive relief, seeking an order declaring Defendants' conduct to violate California law, and permanently enjoining Defendants' unlawful practices.

## PARTIES

5. Plaintiff Legal Impact for Chickens (LIC) is a California non-profit corporation incorporated pursuant to Corporations Code Section 10400. LIC is a California society for the prevention of cruelty to animals (SPCA) and a 501(c)(3) animal-welfare charity. LIC's mission is to prevent and redress cruelty to farmed animals, including by bringing lawsuits against those who violate laws relating to or affecting animals. Although LIC has "Chickens" in its name, the SPCA also advocates for the welfare of cattle, hogs, sheep, ducks, and farmed animals generally. Corporations Code Section 10404 authorizes a cause of action for specially incorporated SPCAs, such as LIC, to obtain preventative relief to prevent cruelty to animals. Corporations Code Section

1 14501 similarly authorizes humane societies like LIC to “enforce the provisions of laws of this state  
2 for the prevention of cruelty to animals,” even “in the absence of a contract with a city, city and  
3 county, or county.”

4 6. Defendant Alexandre Family Farm, LLC is a California limited liability company with  
5 its principal address at 8371 Lower Lake Road, Crescent City, CA 95531. The company is an  
6 industrial dairy operation which keeps several thousand head of cattle at any given time. The  
7 company supplies milk to grocery stores nationwide, including Whole Foods. The company has at  
8 least five different locations: four in Humboldt County, California and one in Del Norte County,  
9 California.

10 7. Defendant Blake Alexandre is, and at all relevant times was, an individual residing in  
11 Crescent City, California. Blake Alexandre is and was at all relevant times an owner, founder, and  
12 operator of Defendant Alexandre Family Farm, LLC. Blake Alexandre lives at one of the Alexandre  
13 farm locations. His home is also the principal address for Defendant Alexandre Family Farm, LLC.

14 8. Defendant Stephanie Alexandre is, and at all relevant times was, an individual residing  
15 in Crescent City, California. Stephanie Alexandre is and was an owner, founder, registered agent,  
16 CEO, and steward of Defendant Alexandre Family Farm, LLC. Stephanie Alexandre lives on one of  
17 the Alexandre Family Farm locations. Her home is also the principal address for Defendant  
18 Alexandre Family Farm, LLC. Stephanie Alexandre gives instructions to Alexandre staff.

19 9. Defendant Joseph Alexandre is, and at all relevant times was, an individual residing in  
20 Ferndale, California. Joseph Alexandre is and was a manager and analyst for Defendant Alexandre  
21 Family Farm, LLC. Joseph Alexandre produces accounting and management reports for Alexandre’s  
22 dairy operations. Joseph Alexandre leads a team of seventeen people in managing the Alexandre’s  
23 dairies.  
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10. Section 10 of Article VI of the California Constitution gives superior courts original

11. California Code of Civil Procedure Section 1060 gives this Court jurisdiction to grant

## 6

12. Venue is proper in this Court pursuant to Code of Civil Procedure Sections 395(a) and

## 10

13. Alexandre routinely abuses its cattle, and deprives them of basic care. Alexandre does

14. Alexandre is a poorly run industrial dairy company.

15. Multiple rancher whistleblowers spoke with the 501(c)(3) nonprofit animal-welfare

16. Alexandre does each of these practices in violation of dairy industry standards.

17. Concerningly, the cruelty at Alexandre involves the top levels of Alexandre's

18. Alexandre offers tours at the Del Norte location. Upon information and belief, this tour

1 County operations. Upon information and belief, Alexandre controls what people can see on this tour.

2 19. The truth is that Alexandre systemically abuses and neglects the animals in its care.

3 20. Indeed, according to a lawsuit complaint, a former herd manager resigned from  
4 working at Alexandre for reasons including Alexandre's mistreatment of animals. *See Manni v.*  
5 *Alexandre*, No. CV2001227, compl. ¶¶ 12–21 (Humboldt Super. Ct. filed Nov. 9, 2020).

6 21. And multiple rancher whistleblowers have spoken up about animal abuse at  
7 Alexandre. Farm Forward compiled information from the whistleblowers and did its own  
8 investigation, with help from a reporter at *The Atlantic*.

9 22. After Farm Forward released its investigation, the American Society for the  
10 Prevention of Cruelty to Animals (ASPCA) removed all Alexandre products from the ASPCA's Shop  
11 With Your Heart list, a list designed to help grocery shoppers find "more humane" and "higher-  
12 welfare foods."

13 23. The website FindHumane.com, which is similarly designed to help consumers "[f]ind  
14 more humanely raised animal-based products," also stopped listing Alexandre's products.

15 24. After Farm Forward released its investigation, Farm Forward discovered that Certified  
16 Humane, a third-party animal welfare certification organization, no longer listed Alexandre Family  
17 Farm as a certified company. Indeed, Alexandre temporarily lost its Certified Humane status, likely  
18 as a result of the company's cruelty being revealed.

19 25. In response to the revelation of Alexandre's animal abuse, the Regenerative Organic  
20 Alliance (ROA) "condemn[ed]" Alexandre's "wrongdoings" and noted that ROA had already  
21 suspended Alexandre's certification based on ROA's own investigation.

22 26. Upon information and belief, multiple retailers have also stopped selling Alexandre  
23 Family Farm products in response to revelations about how the company treats its cattle.  
24

1           **A. Alexandre Puts Salt in Animals' Eyes.**

2           27.     Alexandre intentionally and repeatedly puts salt into animals' eyes.

3           28.     Specifically, according to a dairy-industry whistleblower, on hundreds of occasions,  
4 when an Alexandre cow was suffering from an eye injury, an eye infection, or eye cancer,  
5 Alexandre's response has been to pour finely ground table salt on the cow's eye.

6           29.     According to the whistleblower, out of hundreds of instances of Alexandre pouring  
7 salt into an animal's eye, this painful practice has never helped alleviate any animal's eye problem.

8           30.     Nonetheless, Alexandre carries out this salt-in-eyes practice routinely, at all its  
9 locations.

10          31.     Eye cancer is sadly very common in cattle bred for dairy.

11          32.     Alexandre's practice is to sell cows at auction to the meat industry once the cows are  
12 no longer producing enough milk to be profitable.

13          33.     Cattle who have eye cancer cannot legally be slaughtered for meat, however, and will  
14 ultimately be condemned if sent to a slaughter plant.

15          34.     Moreover, while an auction buyer could profitably cure *some* cattle maladies through  
16 the simple use of antibiotics, an auction buyer *cannot* profitably cure *cancer*.

17          35.     The proper response to discovering cancer in a cow's eye would thus be for Alexandre  
18 to humanely euthanize the animal, in order to put the animal out of her misery.

19          36.     Instead, at the expense of both animal welfare and honesty, Alexandre keeps cows  
20 with cancer alive, exacerbates these cows' pain by putting salt into their eyes, and then proceeds to  
21 sell these cows at auction to beef producers.

22          37.     Dr. James "Jim" Reynolds, DVM, MPVM, an animal-agriculture veterinarian, has  
23 opined about Alexandre's practice of putting salt in animals' eyes. Specifically, Dr. Reynolds stated  
24 that putting salt in any animal's eye would be "horrible." Dr. Reynolds also opined that Alexandre's

1 supposed treatment for eye infections is nonsense.

2 38. This conduct violates California's anti-cruelty laws.

3 **B. Alexandre Dangerously Glues Pieces of Old Clothes Onto the Eyes of Cows Suffering**  
4 **from Apparent Cancer, to Hide Their Illness from Prospective Buyers—and Alexandre**  
5 **Sometimes Glues Cows' Eyes Shut in the Process.**

6 39. After putting salt into a cow's eye, Alexandre's routine practice is to glue a piece of  
7 old clothing onto the cow's eye.

8 40. Upon information and belief, Alexandre does this to hide its cows' cancer from  
9 prospective buyers, because cows with cancer cannot be used for meat.

10 41. In carrying out this nonstandard practice, upon information and belief, Alexandre  
11 sometimes recklessly glues cows' eyes shut in the process.

12 42. According to whistleblowers, Defendant Stephanie Alexandre and other Alexandre  
13 staff make these nonstandard eye patches out of old clothes.

14 43. According to a whistleblower, Alexandre has glued homemade patches onto cattle's  
15 eyes on hundreds of occasions.

16 44. Alexandre then sells these unwell cows at auction with their eye patches still on.

17 45. A news reporter for *The Atlantic* observed an Alexandre cow called Cow 13039 being  
18 sold at auction.

19 46. Cow 13039 was dying. But Alexandre was selling her at auction anyway.

20 47. Cow 13039 had a denim patch glued onto her right eye.  
21  
22  
23  
24



1           48.     Here is an image of the Cow 13039 with the patch on her eye:



23           49.     Representatives from Farm Forward attended the auction as well.

24           50.     Farm Forward was present when Cow 13039 had the patch removed from her right

1 eye.

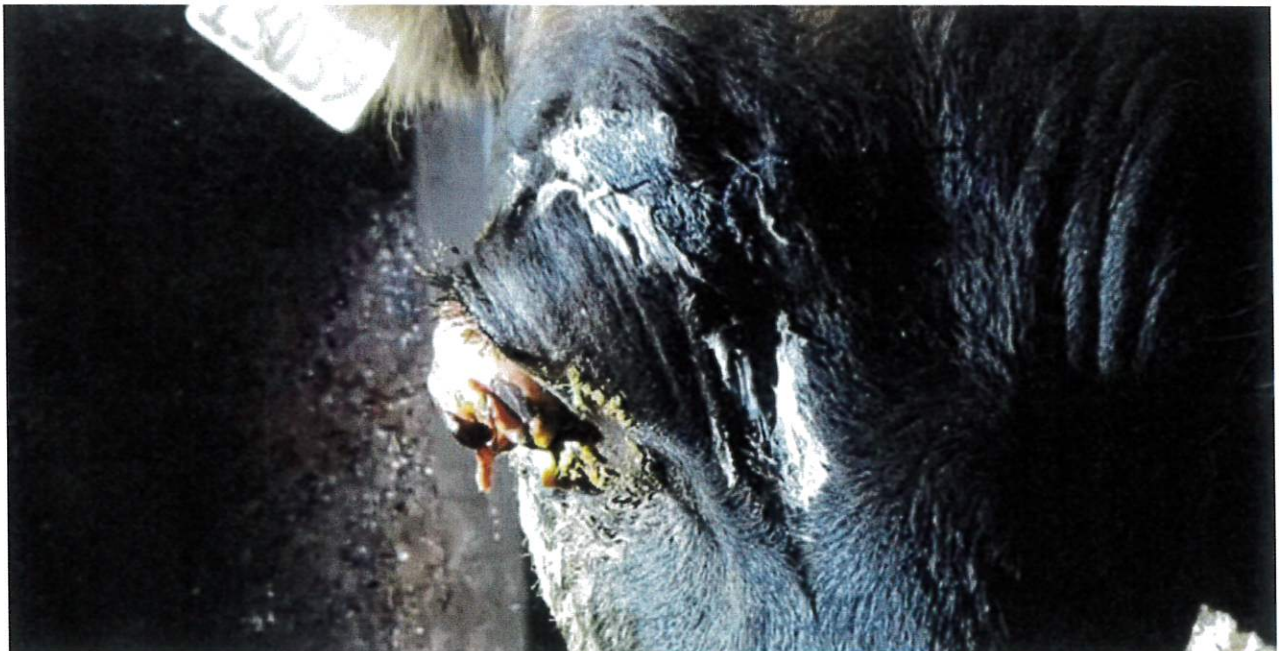
2 51. The patch had been glued on and was difficult to remove.

3 52. Once the patch was ripped off, Farm Forward could see that Cow 13039's eye had  
4 ruptured. Her eye's contents were extruding outside of the eye. Portions of the cow's eye were  
5 hanging down.

6 53. A large-animal veterinarian who works in both the organic and conventional dairy  
7 industries viewed a video of Cow 13039 and her right eye. In the veterinarian's opinion, Cow 13039  
8 likely had cancer. The veterinarian opined that this cancer, in turn, had likely led to the bulging of her  
9 eyes, globe trauma, rupture, and finally infection.

10 54. The veterinarian also opined that the type of eye patch Farm Forward witnessed and  
11 recorded on Cow 13039's eye would **exacerbate the problem.**

12 55. Here is an image of Cow 13039 after her eye patch was removed:



23 56. Even after discovering the cows have cancer, Alexandre commits cruelty by keeping  
24 cows alive, gluing patches on their eyes, and in some cases even gluing their eyes closed. Alexandre



1 commits this cruelty for no other apparent reason than to deceive prospective buyers and maximize  
2 Alexandre's own profits. These ill cows cannot be used for meat. Rather, once a beef-industry buyer  
3 removes the patch and discovers the cancer, the buyer will have no better choice than to euthanize the  
4 suffering animal. Gluing on an eye patch simply serves to increase Defendants' profits while  
5 prolonging and increasing the cow's suffering.

6 57. Indeed, Dr. Reynolds opined that patches have no medical benefit, and that patches  
7 could worsen an infection by trapping dirt and by irritating the eye.

8 58. This conduct, too, violates California's anti-cruelty law.

9 **C. Alexandre Has Been Caught Cutting off a Sick Cow's Sensitive Teat with a Dirty Pocket**  
10 **Knife.**

11 59. In one incident, an Alexandre cow was suffering from a condition known as mastitis.

12 60. Mastitis is an inflammation of the mammary gland. It is generally caused by exposure  
13 to microbes and a resultant infection.

14 61. Mastitis is common in poorly run dairies.

15 62. In a crude attempt to drain the infection, an Alexandre worker cut off a large portion of  
16 the cow's teat.

17 63. The Alexandre worker did this using a dirty pocket knife.

18 64. The Alexandre worker did this without providing the cow any sort of painkiller or  
19 anesthetic.  
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65. Here is a photograph of the aftermath:



66. Cutting off an animal's teat with a dirty pocket knife and without painkiller is **not** the proper standard of care for mastitis.

1           **D. Alexandre Drags Disabled, Living Cows Across Concrete and Gravel in Clear Violation**  
2           **of Industry Guidance.**

3           67.     Alexandre has dragged multiple different living, disabled cows across concrete via  
4           skid loaders.

5           68.     In one incident, for example, Alexandre used a skid loader to drag a live cow across a  
6           concrete pad and gravel for more than 50 yards.

7           69.     Six Alexandre employees watched this brutality.

8           70.     When a new employee came onto the scene and confronted the six who were watching  
9           the cow being dragged, a long-term Alexandre employee responded with words to the effect of, "This  
10          is the way that we've always done it."

11          71.     The new employee reported the incident to Defendant Blake Alexandre. Defendant  
12          Blake Alexandre expressed a lack of concern. He took no known action in response.

13          72.     Here is a photograph of Alexandre carrying out this cruel dragging practice:  
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73. As a result of being dragged, the already disabled cow developed painful sores on her legs.

74. When Alexandre drags disabled cows in this way, the company goes against explicit industry guidance regarding how to move disabled cows.

75. Dairy industry manuals prohibit using the metal hip clamp to hoist and lift cows.

76. The metal hip clamp is a device meant for use as a stability aid—not a tool for moving, dragging, and lifting cows off the ground.

77. Industry guidelines forbid using the hip clamp in exactly the manner Alexandre does, presumably because doing so injures and causes pain to cows.

78. Indeed, Alexandre’s conduct is the National Dairy Farmers Assuring Responsible Management (FARM) Program manual’s ‘textbook’ example of what **not** to do with the hip clamp, as shown in the excerpt below:

## Improper Movement



Animals should never be dragged using mechanical force.



Animal should never be moved horizontally with hip lifts or lifted vertically where their feet cannot touch the ground.

### **E. Alexandre Has Been Caught Leaving Calves Alone in Dirty, Isolated Hutches to Die.**

79. Alexandre has been documented confining calves in dirty, isolated hutches, without room to move for up to 21 weeks. This inhumane process has killed animals.

80. Cattle, including calves, are naturally social animals.

81. Indeed, research shows that early separation from the calf's mother poses a challenge to the calf's health and welfare.



1           82.     At a minimum, calves who have been separated from their mothers at other farms thus  
2 benefit from the company of other calves.

3           83.     While some other farms do keep calves in isolated hutches, those farms typically (1)  
4 allow the calves to walk around a fenced-in area outside their hutch, and (2) totally release the calves  
5 from confinement at eight weeks old.

6           84.     But Alexandre has been documented keeping each of its calves confined inside  
7 individual 5.5-by-8.5-foot plastic hutches for a prolonged period of time.

8           85.     When observing Alexandre from a public road, Farm Forward witnessed calves kept  
9 individually isolated in plastic hutches without even a fenced patch of ground to set a foot outside.

10          86.     Worse yet, the calves have been observed confined within what one observer called a  
11 “soup” of their own built-up feces.

12          87.     Alexandre also intentionally forces its calves to drink out of dirty bottles. Alexandre  
13 intentionally refrains from washing calves’ bottles. As a result, the bottles turn black, purple, and  
14 pink with mold and mildew, as Alexandre uses and reuses them. Alexandre’s reason for declining to  
15 wash the bottles is to expose calves to microbes in a misguided attempt to build the calves’ immune  
16 systems.

17          88.     Many of Alexandre’s calves don’t survive their abuse.

18          89.     Alexandre’s calves have been found dead while isolated in hutches.

19          90.     A whistleblower photographed Alexandre hutches that had extremely poor sanitation.

20          91.     The whistleblower also photographed more than a dozen calves who were found dead  
21 in Alexandre hutches on just one day.



1           92.     Here is a composite image showing five-to-eight different dead calves found on a  
2 single day at Defendants' dairy located in Ferndale, CA:



16           93.     Once again, Alexandre's poor behavior falls below industry standards.

17           94.     For those dairies that use calf hutches, it is generally agreed best practice in the dairy  
18 industry to free calves from confinement by the time they reach eight weeks old.

19           95.     Alexandre keeps calves in hutches far longer than eight weeks.

20           96.     For instance, Defendant Blake Alexandre has admitted that Alexandre keeps calves  
21 isolated in hutches for about 13 weeks.

22           97.     And according to a whistleblower, it's longer than that—up to 21 weeks.

23           98.     In addition, in better-run dairies, calf hutches include at least a fenced patch of ground  
24 so that the calves can spend time outside.

1            99.     Alexandre, on the other hand, has been caught confining calves alone, entirely inside  
2 the hutches without any outdoor access at all.

3            100.    The calves Farm Forward witnessed on Alexandre's property in December 2023, for  
4 instance, **could not set foot outside of their hutches.**

5            101.    Similarly, images uploaded in October and November 2022 as part of a Google Maps  
6 review of an Alexandre Family Farm location appear to show calves confined within their hutches,  
7 and unable to set foot outside.

8            102.    Veterinary expert Dr. Gail Hansen, DVM, reviewed information about Alexandre's  
9 treatment of animals. Dr. Hansen took issue with Alexandre's improper use of calf hutches.

10           103.    Dr. Hansen explained that calf hutches were designed to minimize disease spread. The  
11 veterinarian explained that hutches are intended to be a shelter from exposure to bad weather—  
12 hutches are **not** intended to be cages. The veterinary expert opined that to confine calves inside, such  
13 that the young animals cannot step outside their hutches, "is a **horrific perversion** of use."

14           104.    Lastly, Alexandre cruelly confines its calves in near proximity of their dead herd  
15 mates: Approximately 100 yards from where Alexandre confines its calves, Alexandre keeps a pile of  
16 dead cattle's bodies.

17           **F. Alexandre Starves and Dehydrates Cattle.**

18           105.    Alexandre repeatedly deprives its animals of adequate food.

19           106.    Upon information and belief, at one point, for example, Alexandre ran out of grain to  
20 feed its cattle. Alexandre knew it was out of grain. Alexandre had stopped receiving grain from the  
21 feed mill. Upon information and belief, this was because of Alexandre's failure to pay for grain. As a  
22 result of this lack of grain, Alexandre's cattle were forced to attempt to subsist only on forage. But  
23 Alexandre's property lacks a sufficient amount of land to properly feed cows with forage alone year-  
24 round on all sites. This is because Alexandre knowingly and intentionally stocks its operations with

1 more cows per acre than the land can feed. As a result, during this incident, Alexandre's cattle went  
2 hungry.

3 107. At Alexandre, hunger kills cattle, including by causing desperate cattle to trample one  
4 another or suffocate in a food trough, and, upon information and belief, by making pregnant cows too  
5 skinny to give birth.

6 108. In or around 2019, a whistleblower observed 40 cattle lying dead on the ground at  
7 Alexandre. An Alexandre employee was standing among the dead animals. According to the  
8 whistleblower, the Alexandre employee looked as though he had seen a ghost. The Alexandre  
9 employee explained that the operation had been out of hay for several days. When a feed truck finally  
10 showed up, approximately 800 starving cattle piled on top of one another in a desperate attempt to  
11 reach food. The cows trampled one another. Over 40 animals died and approximately 20 others  
12 suffered severe injuries.

13 109. Upon information and belief, the desperation of Alexandre's hungry cows caused  
14 death on another occasion as well: One Alexandre cow was found dead in a feed trough. The  
15 Alexandre whistleblower who discovered the dead cow believes that the cow fell into a feed trough  
16 and suffocated. The whistleblower believes this fall occurred due to multiple hungry cows—all  
17 desperate to eat from the trough—unintentionally pushing their herd mate in. The whistleblower  
18 believes the fallen animal became trapped and suffocated.

19 110. Upon information and belief, at another point, approximately 80 of Alexandre's  
20 pregnant cows were too skinny to give birth to their large calves. As a result, Alexandre staff had to  
21 kill all 80 heifers and their 80 unborn calves.

22 111. Defendant Blake Alexandre seems to see nothing wrong with intentionally depriving  
23 cows of proper food, forcing the cows to "sacrifice" and get "thinner."

24 112. In a September 2024 interview, Defendant Blake Alexandre described his approach to

1 dealing with land that wouldn't absorb water well, and where the grass was turning brown. Defendant  
2 Blake Alexandre explained that, to address these difficulties with the land, Alexandre put "400 head  
3 or 500 head of bred heifers on it and kind of forced them to eat it down, strip grazing them across it."  
4 Defendant Blake Alexandre said: "It was a sacrifice for the heifers because it's not ideal grass and [ ]  
5 those heifers got thinner than I would like."

6 113. An interviewer asked Defendant Blake Alexandre how Alexandre manages weeds. In  
7 response, Blake explained that he tries to make his cows eat the weeds, but sometimes the cows don't  
8 want to eat weeds. So, the solution Blake found was that "we gotta send the cows out hungry enough  
9 to eat everything and nibble all the weeds and consume them. . . . And so that's the mentality of what  
10 we're doing."

11 114. Defendant Blake Alexandre also admitted that Alexandre sometimes has more cows  
12 than it can feed: "Three years ago, we were financially stressed—We're always financially stressed,  
13 by the way, and we were just out of feed. We didn't have forage two winters in a row. Not enough  
14 forage. Too many cattle. Too much rain. And then soybean meal went from \$800 a ton to \$1,800 and  
15 couldn't feed grain to the cows that needed it."

16 115. Video footage documents the malnourished state of Alexandre's cattle.

17 116. Two videos show a very thin Alexandre cow with weakness and severe muscle  
18 wasting of both hind legs.

19 117. Another video shows an emaciated Alexandre cow with mild left hind lameness.

20 118. And yet another video shows a very thin, severely lame adult Alexandre cow.

21 119. The above illustrates Alexandre's routine practice of starving large numbers of cattle  
22 by failing to secure sufficient food for Alexandre's herds.

23 120. Upon information and belief, Alexandre also starves and dehydrates certain specific  
24 individual bovines when they become immobile. Certain Alexandre animals become disabled such

1 that they cannot stand, or become stuck in Alexandre's equipment. When this happens, Alexandre  
2 ignores the animals' plight, leaving the animals to go without food or water for days.

3 121. For instance, Alexandre was documented mostly ignoring a disabled, downed cow  
4 who lacked the ability to stand. Alexandre left the nonambulatory cow out in the field for two weeks.  
5 Alexandre mostly ignored her. Upon information and belief, Alexandre management never instructed  
6 any employee to feed her, nor to provide her with water. Upon information and belief, she would  
7 have gone without food and water entirely if not for the actions of a kind whistleblower.

8 122. Similarly, Alexandre's faulty or mishandled machinery caused a calf's head to become  
9 stuck in a stanchion. Alexandre ignored the calf for an extended period of time. The calf became  
10 dehydrated. Her eyes became sunken. Her head swelled from her efforts to free herself. Upon  
11 information and belief, Alexandre failed to provide food or water to this calf over the course of three  
12 days.

13 **G. Alexandre Deprives its Animals of Proper Veterinary and Hoof Care.**

14 123. For long stretches of time, Alexandre denied its animals any routine veterinary care.

15 124. As mentioned above, Alexandre was documented ignoring a disabled, downed cow  
16 who lacked the ability to stand, and leaving her in a field for two weeks. Upon information and belief,  
17 Alexandre failed to provide any veterinary care to this severely unwell animal.

18 125. Rather than properly treating its animals' leg injuries with vet wrap, Alexandre's  
19 routine practice was to dangerously tape an animal's leg in duct tape. Whistleblowers reported that  
20 Defendant Joseph Alexandre specifically instructed Alexandre staff to wrap cows' injured legs in  
21 duct tape.

22 126. Better-run local dairies use safe, therapeutic vet wrap to cover the site of a wound or  
23 infection on an animal's leg. Vet wrap aids in a cow's recovery because it expands and contracts with  
24 changes in swelling, and it sticks to itself but doesn't stick to the cow's skin.

1           127. Duct tape acts very differently: it can severely restrict a swollen leg. Duct tape can cut  
2 into the leg or foot when the leg or foot swells. And duct tape sticks to the cow's skin, so it ultimately  
3 needs to be painfully and dangerously ripped off.

4           128. If a dairy cannot, or is unwilling to, provide care for a severely unwell animal, then  
5 euthanasia is indicated. Alexandre, however, repeatedly fails to euthanize animals who are suffering.

6           129. For instance, a veterinarian who viewed animals sold at auction by Alexandre opined:  
7 "[S]everal of these cases are objectively severe . . . and some highlight a chronicity that is  
8 unacceptable from a welfare standpoint. Euthanasia should have occurred sooner, and these animals  
9 are clearly unfit for a sale/auction barn."

10           130. Upon information and belief, many of Alexandre's cows have pneumonia and thus  
11 have trouble breathing. Upon information and belief, the reason for this high rate of pneumonia is  
12 Alexandre's failure to provide proper veterinary care to its animals. Upon information and belief, the  
13 animals' ill health makes it harder for them to withstand temperature fluctuations and has caused  
14 dozens of Alexandre's cattle to die from the summer heat. Upon information and belief, if  
15 Alexandre's cattle had been provided with proper veterinary care, then the animals would have been  
16 healthier and could have withstood the heat.

17           131. Properly run dairies also care for their animals' hooves.

18           132. For long stretches of time, Alexandre, however, denied its animals hoof care  
19 management, causing cows to become crippled.

20           **H. Alexandre Improperly Saws Adult Cows' Horns off Their Skulls Without Anesthesia.**

21           133. Alexandre improperly saws adult cows' horns off their sensitive skulls without  
22 anesthesia.

23           134. The Farmers Assuring Responsible Management (FARM) Animal Care Reference  
24 Manual contains multiple "Management Checklists," each of which "details key on-farm guidelines

1 and best practices.”

2 135. The “Management Checklist” for “Pre-Weaned Calves” includes the following  
3 requirements: “All calves are disbudded before 8 weeks of age,” and “Pain mitigation for disbudding  
4 is provided.”

5 136. The FARM Animal Care Reference Manual elaborates: “The term disbudding refers to  
6 the destruction or excision of horn-producing cells before skull attachment, while dehorning involves  
7 the excision of the horn after skull attachment. Time of attachment varies, but scientific literature  
8 indicates that this occurs around 8 weeks of age. Therefore, best practice is to conduct disbudding at  
9 the earliest age possible, before 8 weeks of age. There is scientific evidence that both disbudding and  
10 dehorning are painful procedures. Administration of local anesthesia, non-steroidal anti-inflammatory  
11 drugs (NSAID) and sedatives all have been shown to provide benefits to calf welfare. An effective  
12 pain management protocol is required. . . . Any attempt to permanently remove the horn after 8 weeks  
13 of age is considered a surgical procedure and should be performed by a licensed veterinarian.”

14 137. Similarly, the American Association of Bovine Practitioners (AABP) recommends  
15 that, “[i]n dairy operations where calves are handled daily, disbudding or dehorning should be  
16 performed by 8 weeks of age.”

17 138. In addition, “AABP recommends that pain management be considered the standard of  
18 care during all dehorning and disbudding procedures.”

19 139. Alexandre violates these industry guidelines.

20 140. Most dairies that choose to disbud their animals do so at a young age, when it is safer  
21 and less painful to do so. These better-run dairies disbud calves before the animals’ horn buds attach  
22 to the animals’ skulls.

23 141. Alexandre, however, allowed the horns of over 800 of its cows to grow for  
24 approximately three to four years.

1 142. As a result, Alexandre's cows' horns fused to the animals' skulls.

2 143. Alexandre then painfully cut off the cows' innervated horns from their sensitive skulls  
3 with a saw.

4 144. It was a bloody process.

5 145. In cutting the adult cows' horns off their skulls, Alexandre cut through living tissue,  
6 innervated with sensitive nerves.

7 146. Alexandre carried out this abusive process without providing any pain management.

8 147. Alexandre failed to use a veterinarian or veterinary equipment for this process. Rather,  
9 Alexandre staff themselves carried out the process using a Sawzall-style reciprocating saw, a  
10 common piece of construction equipment.

11 148. The fear and pain that Alexandre inflicted on 800 cows in this incident caused cows to  
12 stop eating.

13 149. The traumatic process, which Alexandre had carried out while its cows were trapped  
14 in stanchions, also made Alexandre's cows resistant to entering stanchions to be milked. As a result,  
15 the Alexandre's milk production declined after Alexandre sawed off these 800 cows' horns.

16 150. Upon information and belief, as recently as September 2024, Alexandre sent cattle to  
17 auction with horns that had evidently been sawed off in adulthood.

18 151. Alexandre's violent horn-removal process violates industry guidelines.

19 **I. Alexandre Regularly Transports Sick and Injured Animals to Auction.**

20 152. The World Organization for Animal Health, of which the United States is a member,  
21 recommends that animals be considered "unfit to travel" over land (for example, by truck to an  
22 auction barn) if they "are sick, injured, weak, disabled or fatigued," or "unable to stand unaided and  
23 bear weight on each leg," or "cannot be moved without causing them additional suffering."

24 153. Nevertheless, Alexandre regularly transports sick and injured animals to auction.



1           154. After viewing videos of Alexandre's treatment of animals, a veterinarian opined:  
2 "These videos demonstrate regular transport of severely lame and wounded animals unfit for  
3 transport to auction . . . absolutely not in keeping with ethical norms and recommendations set by the  
4 state of California."

5           155. The veterinarian continued: "[T]hese animals are clearly unfit for a sale/auction barn."

6           156. For example, Alexandre transported a mature Jersey cross cow to auction. The cow  
7 was documented exhibiting significant right-hind lameness. The veterinarian who viewed a video of  
8 the cow assessed her as "severely lame." The veterinarian opined, "I do not think transport to and  
9 time in a sale barn/auction is appropriate."

10          157. Alexandre similarly transported a red-and-white Holstein heifer to auction. The heifer  
11 exhibited severe, non-weight-bearing, left-front lameness. The veterinarian opined: "Lameness of this  
12 severity is most often due to one of three causes: fracture, joint infection (sepsis), or foot abscess. . . .  
13 This . . . severely lame animal [ ] should not have been transported to an auction barn."

14          158. Alexandre also transported a mature Holstein cow to auction who showed such severe  
15 left-hind lameness that her rear left leg was totally non-weight-bearing. The veterinarian opined that  
16 the cause was "most likely septic arthritis/tendonitis and/or osteomyelitis of distal limb structures."  
17 The veterinarian continued: "Disease has extended beyond the foot itself into the soft tissues higher  
18 up on the leg, involving joints and likely tendons. This condition is extremely painful. These can be  
19 treated surgically on farm by a skilled veterinarian, but prognosis remains poor and requires antibiotic  
20 therapy. Doing so is often prohibitively expensive and euthanasia is recommended. Transport of an  
21 animal with disease this severe for any reason other than veterinary care is unequivocally inhumane."

22          159. By regularly transporting severely unwell animals to auction, Alexandre violates  
23 industry standards and causes severe, unnecessary suffering.

1           **J. Alexandre's Management Carries Out, is Aware of, Condones, Directs, and Participates**  
2           **in Alexandre's Animal Abuse.**

3           160. As detailed throughout this complaint, Alexandre's management carries out, is aware  
4 of, condones, directs, and participates in Alexandre's animal abuse.

5           161. It is the responsibility of Alexandre and Alexandre's management, including the  
6 individual defendants, to feed Alexandre's cows. It was a conscious decision by Alexandre and  
7 Alexandre's management to stock more animals on Alexandre's property than the land could feed.

8           162. After making that conscious decision, upon information and belief, it was a conscious  
9 decision of Alexandre's management to fail to ensure delivery of sufficient grain to feed Alexandre's  
10 cows.

11           163. Likewise, knowing that Alexandre is "always financially stressed," and that this  
12 financial stress sometimes causes Alexandre cows to go hungry, it is an ongoing conscious decision  
13 of Alexandre's management to continue attempting to raise more cattle than Alexandre can afford to  
14 feed.

15           164. It is the responsibility of Alexandre and Alexandre's management, including the  
16 individual defendants, to provide regular veterinary and hoof care to Alexandre's animals.

17           165. Upon information and belief, Alexandre's wholesale failure to provide veterinary or  
18 hoof care for long stretches of a time was a conscious decision made by Alexandre's management.

19           166. During the incident of Alexandre staff cruelly dragging a live cow by a skid loader for  
20 50 yards, six employees watched on.

21           167. This type of abuse is known, normal, and tolerated within Alexandre's culture.

22           168. A long-term employee described the cow-dragging abuse with words to the effect of,  
23 'the way that we've always done it.'

24           169. In addition, the cow-dragging incident was reported to Defendant Blake Alexandre. He  
seemed unconcerned. He took no known action in response.

170. Similarly, as mentioned above, Defendant Stephanie Alexandre sewed denim eye patches in order to conceal cows' cancerous eyes from bidders at auction.

171. Defendant Stephanie Alexandre also told Alexandre staff to lie to a certifier. Specifically, she instructed staff to lie to an organic certifier about the purpose of backpack sprayers that Alexandre used to spray down the entire herd with diesel fuel, which is an apparent violation of organic rules.

172. Defendant Joseph Alexandre instructed staff to wrap cows' injured legs with duct tape.

173. In addition, one former Alexandre herd manager alleged in a lawsuit that, during his employment at Alexandre from 2017 to 2018, he would complain to Alexandre about Alexandre's inhumane treatment of animals. *See Manni v. Alexandre*, compl. ¶¶ 12, 20, 90.

174. The former herd manager alleged that Alexandre retaliated against him for these complaints. *See id.* ¶ 92.

175. Moreover, from 2019 to 2023, multiple people repeatedly raised animal-welfare issues to Alexandre's management.

176. But Alexandre's management failed to correct these issues.

177. And, as mentioned above, in a September 2024 interview, Defendant Blake Alexandre proudly explained Alexandre's decisions to intentionally deprive animals of food as a method of land management.

**K. Alexandre's Treatment of the Cows and Handling and Management Practices Run Contrary to Accepted Animal Care or Dairy Industry Standards.**

178. A court can recognize Alexandre's behavior as cruel even without reference to industry standards. That said, Alexandre's misconduct *also* contravenes dairy-industry standards.

179. As discussed above, dairy industry manuals prohibit using a metal hip clamp to hoist and lift cows. Industry guidelines forbid using the hip claim in exactly the manner Alexandre does. Indeed, Alexandre's conduct is the National Dairy FARM manual's 'textbook' example of what **not**

1 to do with the hip clamp.

2 180. Dairy industry manuals state that cows should be provided prompt veterinary  
3 attention—both preventative and therapeutic. The University of California-Davis *Cattle Care*  
4 *Standards*, for example, state that, “cattle exhibiting signs of pain, suffering or failure to thrive from  
5 any medical condition or injury should receive medical care or euthanasia performed within an  
6 appropriate time period.”

7 181. Yet Alexandre routinely denies cows any real veterinary care, including for serious  
8 health problems.

9 182. To be clear, Alexandre cannot use its desire to market its products as “organic” to  
10 excuse withholding veterinary care. To the contrary, federal regulations state explicitly that “[a]n  
11 organic livestock operation must not . . . [w]ithhold medical treatment from a sick animal in an effort  
12 to preserve its organic status. All appropriate medications must be used to restore an animal to health  
13 when methods acceptable to organic production fail.” 7 C.F.R. § 205.238(c)(7) (emphases added).  
14 “An organic livestock operation” likewise “must not . . . [w]ithhold individual treatment designed to  
15 minimize pain and suffering for injured, diseased, or sick animals, which may include [ ] euthanasia.”  
16 7 C.F.R. § 205.238(c)(8) (emphasis added).

17 183. As mentioned above, for those dairies that use calf hutches, it is generally agreed best  
18 practice to free calves from confinement by the time they reach eight weeks old. But Alexandre keeps  
19 calves in hutches far longer—up to 13 or 21 weeks.

20 184. As mentioned above, in better-run dairies, calf hutches at least include a fenced patch  
21 of ground so that the calves can spend time outside. Alexandre has been caught intentionally  
22 confining its calves inside their hutches.

23 185. Industry guidelines dictate that, if cows are disbudded, it must occur before eight  
24 weeks of age, and pain management must be used. Alexandre sometimes waits until its cows’ horns

1 have fused to their skulls, and then painfully saws them off—without any painkiller and without  
2 licensed veterinary care, despite this being considered a surgical procedure.

3 186. The World Organization for Animal Health says not to transport sick and injured  
4 animals. Yet Alexandre has been known to send sick and injured cattle to auction for the benefit of  
5 Alexandre's own financial bottom line.

6 187. Alexandre's cruelty is so out of line with industry norms that Walt's Wholesale Meats,  
7 a company which specializes in slaughtering dairy cows for meat for human consumption, has  
8 stopped accepting all cows from Alexandre.

9 188. The cruelty is so out of line with industry norms that, upon information and belief,  
10 multiple retailers, including Providore Fine Foods and Luke's Local, have stopped selling Alexandre  
11 products as a result of the way Alexandre has been revealed to treat animals.

12 189. Alexandre's cruelty is so out of line with industry norms that several other members of  
13 the ranching and farming community have stepped forward as whistleblowers to speak out against  
14 Alexandre.

15 190. The cruelty is so out of line with industry norms that it contributed to one former  
16 Alexandre herd manager resigning from his employment. *See Manni v. Alexandre*, compl. ¶¶ 12–21.

17 191. Alexandre's cruelty is so out of line with industry norms that the Northeast Organic  
18 Dairy Producers Alliance (NODPA) spoke out against Alexandre in 2024, after NODPA learned the  
19 truth about how Alexandre raises its animals.

20 192. Kathie Arnold, an organic dairy farmer, NODPA's founder, and the chair of the  
21 NODPA policy committee, wrote that the documentation of Alexandre's animal abuse was  
22 "devastating." She stated that the documentation displayed "so many scenes that should never  
23 happen" at any dairy. She stated that any dead animals at a dairy "should be dealt with rapidly and  
24 appropriately, which looks like it has not happened in many cases" at Alexandre.

1           193. In response to Alexandre’s attempt to excuse its poor behavior, NODPA stated the  
2 following: “Blaming long hours of work or poorly trained employees is no excuse. If the operation is  
3 beyond the owner/corporate manager’s capacity and current management practices, it is the  
4 responsibility of the ‘responsible person’ [ ] to make changes, not to plead victimization.”

5           194. And, as an organization which supports dairy farmers, NODPA wouldn’t criticize  
6 Alexandre lightly. Indeed, in or around 2021, NODPA had published a promotional article on  
7 Alexandre, before learning the truth of how Alexandre actually raises its animals.

8           195. Lastly, Alexandre’s cruelty is so out of line with industry norms that the Regenerative  
9 Organic Alliance “condemn[ed]” Alexandre’s “wrongdoings” and suspended Alexandre’s  
10 certification based on its own investigation.

11           **L. Alexandre Has a History of Dishonesty.**

12           196. The Defendants have a history of dishonesty.

13           197. For instance, Defendant Stephanie Alexandre instructed Alexandre staff to lie to a  
14 certifier about the purpose of backpack sprayers that Alexandre used to spray cows with diesel fuel.  
15 So many cows die at Alexandre that the company sometimes has pits with 60 to 70 dead cows.  
16 Alexandre forces its live cows to eat grass in the same field where their fellow herd mates’ dead  
17 bodies are decomposing. These dead pits attract flies. To repel these flies—in a violation of organic  
18 rules—Alexandre tells its staff to use backpack sprayers to spray the company’s cows with diesel  
19 fuel. When a certifier announced a visit to Alexandre, Defendant Stephanie Alexandre told staff to lie  
20 to the certifier by telling the certifier that the purpose of the backpack sprayers was to prevent  
21 machinery from rusting.

22           198. Similarly, the denim patches discussed above were designed to conceal the  
23 Alexandre’s cows’ cancer from prospective buyers.

24           199. And Alexandre intentionally deceives banks in multiple ways. Alexandre uses its cows

1 as collateral to obtain one or more bank loans. Alexandre has taken multiple steps to deceive banks  
2 into believing that Alexandre has more cows than the company really has.

3 200. First, Alexandre instructed its staff to move cattle between various Alexandre fields.  
4 Alexandre's goal in moving the cattle was to deceive a bank's inspector into believing that Alexandre  
5 owned more cattle than Alexandre actually owned.

6 201. Second, Alexandre intentionally left culled cattle listed as alive in the DairyCOMP  
7 computer system. Alexandre did this to artificially inflate the number of cattle that Alexandre would  
8 appear to have.

9 202. Alexandre also dishonestly presents itself to consumers and the public as a humane  
10 dairy, despite committing illegal animal cruelty.

11 203. And Alexandre dishonestly presents itself as an organic dairy to the public, despite  
12 violating organic standards. Indeed, Alexandre has cultivated a reputation within the dairy industry  
13 for disregarding regulations.

14 204. The Alexandre's dishonesty has, for too long, concealed Alexandre's illegal animal  
15 cruelty and shielded the company from legal accountability.

16 **M. Alexandre's Animal Abuse is Continuing.**

17 205. Upon information and belief, Alexandre continues to commit unlawful animal cruelty,  
18 and will continue to do so absent court intervention.

19 206. Upon information and belief, Alexandre's animal abuse will continue indefinitely  
20 absent court intervention.

21 207. The persistent nature of Alexandre's abuse can be demonstrated by the fact that  
22 Alexandre's pattern of abuse has already gone on for years—including even after Alexandre  
23 management was informed of concerns, and even after Alexandre knew that its behavior was going to  
24 be publicly revealed.

1           208. As far back as 2018, an Alexandre herd manager quit Alexandre for reasons including  
2 animal mistreatment. *Manni v. Alexandre*, compl. ¶¶ 12–21.

3           209. And Alexandre’s animal abuse has been documented in video form since at least 2019.

4           210. Then, in December 2022, the first whistleblower approached Farm Forward with  
5 complaints about Alexandre Family Farm.

6           211. From January through May 2023, multiple whistleblowers came forth, verifying and  
7 expanding on the original whistleblower’s allegations.

8           212. From June through December 2023, multiple whistleblowers provided hundreds of  
9 videos, hundreds of photos, and more than a dozen affidavits to Farm Forward.

10          213. In December 2023, Farm Forward verified at a California cattle auction that Alexandre  
11 was selling sick, emaciated cattle with egregious untreated or inadequately treated conditions.

12          214. From January through March 2024, multiple whistleblowers continually provided  
13 Farm Forward with evidence of ongoing systematic nontreatment of sick and injured animals at  
14 Alexandre.

15          215. By March 8, 2024, Alexandre was aware that Farm Forward was looking into  
16 Alexandre and preparing to share a set of concerns about Alexandre publicly. Upon information and  
17 belief, Alexandre knew that these concerns involved animal abuse.

18          216. But video evidence shows that Alexandre continued to mistreat cows even after being  
19 aware that a nonprofit was preparing to publicly announce concerns about Alexandre. That evidence  
20 includes 2024 videos of: an adult Alexandre cow with a bloody stump where a horn was apparently  
21 just cut off, Alexandre cattle who appear to be unhealthfully thin, a lame Alexandre cow whose foot  
22 has apparently been inappropriately wrapped in duct tape, and more.

23          217. In addition, upon information and belief, in September 2024, Alexandre sent dozens of  
24 cattle to auction. Some or all of these animals appeared to have horns that had been sawed off during



1 their adulthood, appeared crippled, appeared weak, or had apparent udder issues.

2 218. Defendant Blake Alexandre's statements in the September 2024 interview indicate that  
3 Alexandre still sees nothing wrong with intentionally depriving its cattle of food. This indicates that  
4 Alexandre is unlikely to change its behavior absent court intervention.

5 219. In addition, the wide-ranging variety of ways in which Alexandre abuses cows,  
6 management's involvement in that abuse, the recent evidence, and Alexandre's history of deception  
7 also all demonstrate that Alexandre's cruelty is unlikely to stop absent court intervention.

## 8 **FIRST CAUSE OF ACTION**

### 9 **Declaratory and Injunctive Relief Under Corporations Code § 10404** 10 **Against All Defendants**

11 220. Plaintiff LIC hereby incorporates by reference each and every allegation in this  
12 Complaint as though fully set forth herein.

13 221. Corporations Code Section 10404 empowers humane societies specially incorporated  
14 under Section 10400 to obtain preventative relief by "proffer[ing] a complaint against any person,  
15 before any court or magistrate having jurisdiction, for the violation of any law relating to or affecting  
16 animals."

17 222. LIC is a humane society incorporated under Section 10400 of the Corporations Code.

18 223. Pursuant to Section 10404, LIC seeks to enjoin Defendants from continuing to violate  
19 laws relating to or affecting animals.

20 224. LIC is entrusted with the authority, via Corporations Code Section 10404, to challenge  
21 Defendants' illegal animal abuse, as part of California's explicit and comprehensive legislative  
22 scheme for enforcement of anticruelty laws. California societies for the prevention of cruelty to  
23 animals (SPCAs) may bring civil lawsuits like this one to enjoin violations of laws related to animals  
24 under section 10404.

225. California's animal cruelty statutes prohibit "every act, omission, or neglect whereby

1 [an animal's] unnecessary or unjustifiable physical pain or suffering is caused or permitted." *See* Cal.  
2 Penal Code § 599b.

3 226. California's animal cruelty statutes include sections 597, 597.1, 597a and 597t of the  
4 Penal Code.

5 227. These sections state that the following people are guilty of a crime:

- 6 a. "a person who maliciously and intentionally maims, mutilates, tortures, or  
7 wounds a living animal," Cal. Penal Code § 597(a);
- 8 b. "a person who . . . maliciously and intentionally kills an animal," Cal. Penal  
9 Code § 597(a);
- 10 c. "a person who overdrives, overloads, drives when overloaded, overworks,  
11 tortures, torments, deprives of necessary sustenance, drink, or shelter, cruelly  
12 beats, mutilates, or cruelly kills an animal," Cal. Penal Code § 597(b);
- 13 d. "a person who . . . causes or procures an animal to be so overdriven,  
14 overloaded, driven when overloaded, overworked, tortured, tormented,  
15 deprived of necessary sustenance, drink, shelter, or to be cruelly beaten,  
16 mutilated, or cruelly killed," Cal. Penal Code § 597(b);
- 17 e. "whoever, having the charge or custody of an animal, either as owner or  
18 otherwise, subjects an animal to needless suffering, or inflicts unnecessary  
19 cruelty upon the animal, or in any manner abuses an animal, or fails to provide  
20 the animal with proper food, drink, or shelter, or protection from the weather,  
21 or who drives, rides, or otherwise uses the animal when unfit for labor," Cal.  
22 Penal Code § 597(b);
- 23 f. "[e]very owner, driver, or keeper of any animal who permits the animal to be  
24 in any building, enclosure, lane, street, square, or lot of any city, county, city

1 and county, or judicial district without proper care and attention,” Cal. Penal  
2 Code § 597.1(a)(1);

3 g. “[w]hoever carries or causes to be carried in or upon any vehicle or otherwise  
4 any domestic animal in a cruel or inhuman manner,” Cal. Penal Code § 597a;

5 h. “[w]hoever . . . knowingly and willfully authorizes or permits [a domestic  
6 animal] to be subjected to unnecessary torture, suffering, or cruelty of any  
7 kind,” Cal. Penal Code § 597a; and

8 i. “[e]very person who keeps an animal confined in an enclosed area” and fails to  
9 “provide it with an adequate exercise area,” Cal. Penal Code § 597t.

10 228. These protections generally extend to all animals. Under Penal Code Section 599b,  
11 “the word ‘animal’ includes every dumb creature.”

12 229. These legal protections apply to cattle, including those in dairies.

13 230. Upon information and belief, Defendants are in ongoing violation of California’s  
14 animal cruelty laws.

15 231. Specifically, Defendants are violating California Penal Code sections 597, 597.1,  
16 597a, and 597t.

17 232. California law expressly makes companies liable for animal cruelty the company  
18 commits, including cruelty committed by the company’s agents and employees against the company’s  
19 animals. *See* Cal. Penal Code § 599b (“[T]he words ‘owner’ and ‘person’ include corporations as well  
20 as individuals; and the knowledge and acts of any agent of, or person employed by, a corporation in  
21 regard to animals transported, owned, or employed by, or in the custody of, the corporation, must be  
22 held to be the act and knowledge of the corporation as well as the agent or employee.”).

23 233. Specific examples of ways in which Alexandre violates California’s cruelty laws are  
24 listed below, by way of example only and not limitation.

1           234. Defendants violate **Penal Code section 597(a)** by maliciously and intentionally  
2 maiming, mutilating, torturing, and wounding a living animal each time Defendants cut off a sick  
3 cow's sensitive teat with a dirty pocket knife, improperly dehorn adult cattle without anesthesia, pour  
4 salt into a cow's eye, glue a cow's eye closed, and isolate calves in closed hutches.

5           235. Defendants violate **Penal Code section 597(b)** by overdriving and overworking an  
6 animal each time Defendants fail to treat ailing cows with appropriate veterinary care, continue to  
7 milk them for profit, and, when no longer financially viable to keep them, send unwell cows to  
8 auction.

9           236. Defendants also violate **Penal Code section 597(b)** by torturing, tormenting, and  
10 mutilating an animal each time Defendants cut off a sick cow's sensitive teat with a dirty pocket  
11 knife, improperly saw an adult cow's horns off her skull without anesthesia, pour salt into a cow's  
12 eye, glue a cow's eye closed, and take other such actions.

13           237. Defendants also violate **Penal Code section 597(b)** by depriving an animal of  
14 necessary sustenance and drink each time Defendants choose to stock more animals than their land  
15 can feed year-round, fail to ensure delivery of sufficient feed for the animals, and fail to tend to  
16 animals who are immobile and thus unable to reach food.

17           238. Defendants also violate **Penal Code section 597(b)** by causing and procuring animals  
18 to be mistreated each time they direct or allow Alexandre staff to mistreat animals.

19           239. Defendants also violate **Penal Code section 597(b)** by, having the charge or custody  
20 of an animal, as owner and otherwise, subjecting the animal to needless suffering, and inflicting  
21 unnecessary cruelty upon the animal, and abusing the animal, and failing to provide the animal with  
22 proper food or drink, and driving and otherwise using the animal when unfit for labor, in the manners  
23 described above.

24           240. Defendants violate **Penal Code section 597.1** by, as owners and keepers of the cattle

1 at Alexandre, permitting the animals to be in enclosures without proper care and attention.

2 241. Defendants violate **Penal Code section 597a** by carrying animals and causing cattle to  
3 be carried in a cruel and inhuman manner in and upon a vehicle (a skid loader), and knowingly  
4 authorizing and permitting cattle to be subjected to unnecessary torture, suffering, and cruelty.

5 242. Defendants violate **Penal Code section 597t** by confining calves in an enclosed area  
6 without providing the calves an adequate exercise area.

7 243. Upon information and belief, Defendants continue to commit unlawful animal cruelty  
8 and neglect every day.

9 244. Upon information and belief, each of the Defendants either explicitly or implicitly  
10 authorized the acts of animal abuse and neglect described herein.

11 245. Each act of abuse or neglect alleged in this Complaint was unnecessary and  
12 unjustifiable.

13 246. Although dairy industry standards do not provide a metric for what is necessary or  
14 justified, that Alexandre's conduct falls so far short of, and in many instances is diametrically  
15 opposed to, dairy industry standards indicates that, by definition, it is neither necessary nor justified.  
16 It is patently unnecessary for a dairy to repeatedly violate so many of its own industry standards.

17 247. Moreover, none of the abuse or neglect could be justified for any other reason—none  
18 was done in self-defense or in defense of others, for example.

19 248. Upon information and belief, each of the animal victims was owned by Defendants, in  
20 the custody of Defendants, or both, during the abuse and neglect.

21 249. Each of the employees who carried out the abuse and neglect was an agent of  
22 Defendants.

23 250. Alexandre and its partners, owners, and managers are responsible for each act of abuse  
24 or neglect alleged herein.

251. The individual defendants are responsible for each act of abuse and neglect they committed personally, for each act of abuse and neglect committed by their respective subordinates, and for each act of abuse and neglect committed at Alexandre in their presence.

252. Unless specifically enjoined by this Court, Defendants will continue their illegal conduct.

253. Plaintiff LIC seeks injunctive relief preventing Defendants from continuing to violate these laws pursuant to the enforcement authority provided by Corporations Code Section 10404, in addition to other relief, as described in the Prayer for Relief below.

## SECOND CAUSE OF ACTION

**Declaratory and Injunctive Relief Under Corporations Code § 14501  
Against All Defendants**

254. Plaintiff LIC hereby incorporates by reference each and every allegation in this Complaint as though set forth in full herein.

255. Pursuant to Section 14501 of the Corporations Code, “[a] humane society may”  
“enforce the provisions of laws of this state for the prevention of cruelty to animals,” even “in the  
absence of a contract with a city, city and county, or county.”

256. LIC is a humane society incorporated under Section 10400 of the Corporations Code.

Pursuant to Section 14501, LIC seeks to enforce the provisions of laws of this state for the prevention of cruelty to animals.

257. Defendants are in ongoing violation of California’s animal cruelty laws, as described in the First Cause of Action.

258. LIC seeks injunctive relief preventing Defendants from continuing to violate these laws pursuant to the enforcement authority provided by Corporations Code Section 14501, in addition to other relief, as described in the Prayer for Relief below.

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff LIC seeks judgment in its favor and against Defendants, and each of  
3 them, as follows:

4 On All Causes of Action:

- 5 1. For declaratory relief stating that Defendants' conduct violates California animal cruelty  
6 laws;
- 7 2. For permanent injunctive relief preventing Defendants and their successors, agents,  
8 representatives, employees, and any party acting in concert with them, from engaging in  
9 conduct that violates the California animal cruelty laws;
- 10 3. For permanent injunctive relief preventing Defendants and their successors, agents,  
11 representatives, employees, and any party acting in concert with them from putting salt in  
12 cows' eyes, gluing patches onto cows' eyes, cutting off cows' body parts, dragging  
13 nonambulatory cows, confining calves in hutches without outdoor access, starving and  
14 dehydrating cows, denying veterinary and hoof care, sawing off adult cows' horns, and  
15 sending sick or injured cows to auction;
- 16 4. For damages in an amount to be determined;
- 17 5. For exemplary and punitive damages in an amount to be determined;
- 18 6. For all costs, expenses, and reasonable attorneys' fees incurred by Plaintiff in bringing this  
19 action; and
- 20 7. For such other and further relief as the Court may deem just and proper.

21 DATED: September 30, 2024

22 **JANSSEN MALLOY LLP**

23 By: 

24 Megan A. Yarnall

Attorneys for Plaintiff,

LEGAL MPACT FOR CHICKENS