

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,  
Plaintiff,

v.

- 01 HEALTHY FAMILY FARMS, LLC,
- 02 SHARON ANN PALMER (04/14/1960),  
aka SHARON ANN PALMER-ROSS,
- 03 JAMES CECIL STEWART (07/26/1947),
- 04 EUGENIE VICTORIA BLOCH (03/17/1953),  
aka EUGENIE VICTORIA LOLAUGH,  
aka EUGENIE VICTORIA COULTER

Defendants.

CASE NO. BA385253

**FILED**

2011 JUN 30 PM 3 18

**FELONY COMPLAINT  
FOR ARREST WARRANT**

GENERAL CRIMINAL  
LOS ANGELES SUPERIOR COURT

The undersigned is informed and believes that:

COUNT 1

On and between March 27, 2010 and June 30, 2010, in the County of Los Angeles, the crime of PROCESSING MILK WITHOUT PASTEURIZATION, in violation of FOOD & AGRICULTURE CODE SECTION 35283(a), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER and JAMES CECIL STEWART, who did willfully and unlawfully process without pasteurization, milk or a milk product which is required to be pasteurized by Division 15 of the FOOD & AGRICULTURE CODE.

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COUNT 2

On and between March 27, 2010 and June 30, 2010, in the County of Los Angeles, the crime of UNLICENSED MILK PLANT, in violation of FOOD & AGRICULTURE CODE SECTION 35283(b), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER and JAMES CECIL STEWART, who did willfully and unlawfully manufacture and process for resale any milk or milk product in a milk products plant that is not licensed by the director pursuant to Chapter 12, Division 15 of the FOOD & AGRICULTURE CODE.

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COUNT 3

On and between March 27, 2010 and June 30, 2010, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER, JAMES CECIL STEWART, and EUGENIE VICTORIA BLOCH, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of UNLAWFUL SALE OF MILK OR MILK PRODUCT, a violation of Food & Agriculture Code Section 32901, a Misdemeanor, whereby it is unlawful for any person to sell, give away, deliver or knowingly purchase or receive any milk, cream, product of milk or cream, imitation milk, imitation cream, product resembling a milk product, or any substitute for any milk product which does not conform to the standards which are established by this division; and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, said defendants committed the following overt act and acts at and in the state of California.

OVERT ACTS

1. On and between January 1, 2008 and June 30, 2010, Sharon Ann Palmer operated a working farm called Healthy Family Farms, LLC, in Santa Paula, California, without the permits and licenses required by local, county and state officials for its milk, dairy and egg products.
2. Sharon Ann Palmer and co-conspirators James Cecil Stewart, Eugenie Victoria Bloch and others named and unnamed, assisted in the operation of Healthy Family Farms (HFF) and the distribution of its milk, dairy and egg products.

3. On and between March 27, 2010 and June 30, 2010, raw, unpasteurized goat milk and goat milk products processed and manufactured by HFF were distributed, sold, and delivered by and to, an unlicensed and unpermitted food facility known as Rawesome located on Rose Avenue in Venice, California.
4. Rawesome is operated by James Cecil Stewart.
5. On or about March 27, 2010: "Victoria" (later ID'd as EUGENIE VICTORIA BLOCH) gives Healthy Family Farms (HFF) brochure to "customer Treviso\La Rue" at a farmer's market in Santa Monica, CA, and tells her that she must become a CSA member to place orders for raw/unpasteurized dairy products. Orders must be placed in advance and that she, "Victoria," is the one who processes them.
6. On or about April 5, 2011: "Customer Bob Donnalley" receives a confirmation email from "Victoria" with a CSA application for HFF and tells him to complete it and bring \$50 to the farmer's market where he will receive a membership card.
7. On or about April 17, 2010: Woman at HFF booth identifies herself as "Victoria" and accepts membership application from Bob Donnalley and takes \$50 for the membership. She then gives him four unlabeled containers of dairy products and when asked "how fresh is it?" replies, "a couple of days."
8. On or about May 10, 2010: "Victoria" replies to an email sent by "customer Ward\Kennedy" and confirms his order for raw dairy products. She tells him that he must pick up his order at an "after hours" location at a Smart and Final parking lot in Santa Barbara.
9. On or about May 13, 2010: "Customer Treviso\La Rue" talks with male HFF vendor at farmer's market in South Pasadena who asks if "Treviso\La Rue" had heard of Rawesome Foods in Venice and described it as having the "best from around the world" in raw foods. The HFF vendor tells "Treviso\La Rue" that Rawesome is a private membership club that carries HFF products but has no web site because it wants to be "under the radar". The HFF vendor gives "Treviso\La Rue" an HFF brochure and writes the address of Rawesome on it. HFF brochure is the same as the one given to "Treviso\La Rue" by Victoria at Santa Monica farmer's market.
10. On or about May 15, 2010: Unknown female HFF vendor at Old Town Farmer's Market in Calabasas tells "customer LeCavalier\La Rue" that she has to be a CSA member in order to pick up raw dairy product. Female vendor says she is "not supposed to sell to non-members." When "LeCavalier\La Rue" tells vendor that "Victoria" said she could try goat dairy products before becoming a member, the vendor lets her buy two unlabeled goat cheeses and one pint of goat yogurt without becoming a member.

11. On or about May 15, 2010: HFF booth vendor at Santa Barbara farmer's market, ID'd as "Deb," tells "customer Ward\Kennedy" that it is "illegal" for her to sell unpasteurized dairy products at the location and that he must meet her at "after hours" location at Smart and Final parking lot.
12. On or about May 15, 2010: "Deb" is in beige colored Ford van license number 6GWT272 registered to HFF in the Smart and Final parking lot. "Customer Ward\Kennedy" overhears Deb tells another customer that the raw cow's milk is from "Rawesome Food." When "Ward\Kennedy" asks for his order, "Deb" searches through five ice coolers in the back of the van and pulls out the water-soaked order: six unlabeled containers of raw dairy products. She takes his money for his membership and the raw products and gives him a membership card.
13. On or about May 19, 2010: Two unidentified women at Rawesome Foods ask "customers Treviso\La Rue" and "Ward/Kennedy" if they are members upon entry. When they answer in the negative they are told that they may buy a day pass. A \$1 Day Pass signed by "Angie" is given to them, as well as a blank Club Membership Agreement form for the "Right To Choose Healthy Food's Rawesome Club." They receive a receipt for their purchase which reads, in part, "1 SHARON GOAT MLK QT \$7.95" and "1 SHARON GOAT WY QT \$6.95."
14. On or about May 19, 2010: A large walk-in refrigerator in Rawesome has an area containing assorted dairy products with two large signs posted – one reads "Healthy Family Farms" and the other reads "Miller's Organic Farms" from Pennsylvania. Unknown male employee at Rawesome tells them that the unpasteurized cow's milk comes from Pennsylvania and the unpasteurized goat products are from "Healthy Family Farms" in Santa Paula.
15. On or about June 1, 2010: "Customer Robert Davis" receives an email from "Victoria" using email address [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com) telling him that "You'll need to join our CSA to have access to the dairy products (legal and regulatory reasons), but you can place an order and sign up at the market and then pick up your order...I'm attaching our CSA brochure, which will give you some background, as well as the membership form."
16. On or about June 1, 2010: Attached to "Robert Davis" email is a brochure titled Healthy Family Farms CSA that includes a photo of Sharon Palmer and which reads "We know you'll enjoy the pasture-raised truly free-range...foods we offer." The brochure lists prices for eggs, meat, poultry and dairy products and the email address for orders and membership as [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com).
17. On or about June 1, 2010: A membership agreement is attached to the email sent by "Victoria" to "customer Robert Davis" titled "Membership Agreement, Right To Choose Healthy Food's Healthy Family Farms" and in the upper left hand corner lists Right to Choose Healthy Food, P.O. Box 176, Santa Monica, CA 90406-0176 and email: [optimal@earthlink.net](mailto:optimal@earthlink.net). The agreement notes that as a member "I completely reject and

refuse all governmental food standards. I fully trust the board members of this club to properly oversee and manage the preparation, handling and packaging of the food in this club, including but not limited to raw meat, raw eggs, raw produce, raw juices, **raw dairy...**”

18. On or about June 2, 2010: email from Victoria at [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com) to “customer Robert Davis” tells him that “I do need you to know that the first time or two that you order raw cow’s milk products, we need to add a \$5 service fee (because those products are ones we purchase from another farm, like us, all grass, all the time...all the goat dairy products come from our farm.)”

19. On or about June 30, 2010: Sharon Palmer tells DA Investigator Ken Ward while executing the search warrant that James Stewart is the owner of Rawesome and that he has been to the farm (HFF) to pick up eggs and milk for Rawesome members.

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#### COUNT 4

On and between March 27, 2010 and June 30, 2010, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER and JAMES CECIL STEWART, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of UNSANITARY CONDITIONS, in violation of FOOD & AGRICULTURE CODE SECTION 32907, a Misdemeanor, who did sell, give away, deliver or knowingly purchase or receive any milk or any product of milk, which had been produced or handled in or by a dairy farm, milk products plant, carrier, store or depot that is in an unsanitary condition and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, said defendants committed the following overt act and acts at and in the state of California.

#### OVERT ACTS

1. On and between January 1, 2008 and June 30, 2010, Sharon Ann Palmer operated a working farm called Healthy Family Farms, LLC, in Santa Paula, California, without the permits and licenses required by local, county and state officials for its milk, dairy and egg products.

2. Sharon Ann Palmer and co-conspirators James Cecil Stewart, Eugenie Victoria Bloch and others named and unnamed, assisted in the operation of Healthy Family Farms (HFF) and the distribution of its milk, dairy and egg products.
3. On and between March 27, 2010 and June 30, 2010, raw, unpasteurized goat milk and goat milk products processed and manufactured by HFF were distributed, sold, and delivered by and to, an unlicensed and unpermitted food facility known as Rawesome located on Rose Avenue in Venice, California.
4. Rawesome is operated by James Cecil Stewart.
5. On or about April 17, 2010: Woman at HFF booth in Santa Monica identifies herself as "Victoria" and accepts membership application from "customer Bob Donnalley" and takes \$50 for the membership. She then gives him four unlabeled containers of dairy products and when asked "how fresh is it?" replies, "a couple of days."
6. On or about May 10, 2010: "Victoria" replies to an email sent by "customer Ward\Kennedy" and confirms his order for raw dairy products. She tells him that he must pick up his order at an "after hours" location at a Smart and Final parking lot in Santa Barbara.
7. On or about May 13, 2010: "Customer Treviso\La Rue" talks with male HFF vendor at farmer's market in South Pasadena who asks if "Treviso\La Rue" had heard of Rawesome Foods in Venice and described it as having the "best from around the world" in raw foods. The HFF vendor tells "Treviso\La Rue" that Rawesome is a private membership club that carries HFF products but has no web site because it wants to be "under the radar" The HFF vendor gives "Treviso\La Rue" an HFF brochure and writes the address of Rawesome on it. HFF brochure is the same as the one given to "Treviso\La Rue" by Victoria at Santa Monica farmer's market.
8. On or about May 15, 2010: HFF booth vendor at Santa Barbara farmer's market, ID'd as "Deb," tells "customer Ward\Kennedy" that it is "illegal" for her to sell unpasteurized dairy products at the location and that he must meet her at "after hours" location at Smart and Final parking lot.
9. On or about May 15, 2010: "Deb" is in beige colored Ford van license number 6GWT272 registered to HFF in the Smart and Final parking lot. "Customer Ward\Kennedy" overhears Deb tells another customer that the raw cow's milk is from "Rawesome Food." When "Ward\Kennedy" asks for his order, "Deb" searches through five ice coolers in the back of the van and pulls out the water-soaked order: six unlabeled containers of raw dairy

products. She takes his money for his membership and the raw products and gives him a membership card..

10. On or about June 30, 2010: Martin Orozco Parias told Investigators that he was paid \$12 per hour in cash by Sharon Palmer to milk goats at HFF. The goat milk was automatically transferred from the milking stations to a large vat inside the barn which was about 60 feet way. He said he cleaned the equipment with hot water and Tetracide 700. He has seen Palmer take some goat milk from the refrigerated vat and put it into a jar. He knew Palmer sold the goat milk but never saw her make cheese.

11. On or about June 30, 2010: Sharon Palmer told investigators that the Rawesome group in Los Angeles owns 40 goats and that when she moved onto this farm they asked her to board the goats. Rawesome was a members only club and Rawesome gave her funds to feed and milk the goats. Different individuals arrived each week to pick up the milk.

12. On or about June 30, 2010: Palmer said Rawesome's owner is James Stewart who had been to the farm to pick up eggs and milk for Rawesome members.

13. On or about June 30, 2010: Cheese making cultures were found in the HFF barn's freezer. Palmer told investigators that they were left over from the 2008 search warrant conducted by Ventura County. Palmer said she rarely makes cheese anymore.

14. On or about June 30, 2010: Palmer told CDFA inspectors that milk was not used for public consumption and thus it was ok for the milk to travel underground from the milking stations to the refrigerated vat some 60 feet away.

15. On or about June 30, 2010: Search Warrant executed at HFF reveals no pasteurization equipment or required charts in the processing room or adjacent area. Commercial grade Cleveland brand cooker was found filled halfway with whey liquid and small pieces of cheese curd floating in liquid. CDFA inspectors said this was indicative of cheese being processed in the cooker. Myriad of cheese making equipment and paraphernalia indicative of dairy food processing were found inside the processing room and the "cold box"

16. On or about June 30, 2010: Within the large walk-in cold box (refrigerator) trays of uncovered whole raw chickens were found stored in proximity to dairy products in the cold box allowing for potential cross contamination from raw chicken to dairy.

17. June 30, 2010: Search Warrant executed at Rawesome reveals walk-in refrigerator – shelving filled with unlabeled containers of dairy products. Signs near the shelving identified specific varieties of raw (unpasteurized) goat products from HFF and Amish imports from Pennsylvania.

18. On or about June 30, 2010: A sign posted by James Stewart at Rawesome read:  
“WE HAVE NO HEALTH DEPT. CRAWLING UP OUR BACKS...AND THAT’S JUST THE ISSUE ISN’T IT? I’M SORRY IF YOU FEEL THREATENED BY THIS MESSAGE, BUT I’M GOING TO HIRE ALL NEW PEOPLE IF FROM NOW ON, THE KITCHEN IS NOT COMPLETELY CLEAN. I FIRED ANTHONY LAST WEEK BECAUSE I WAS TIRED OF SAYING THE SAME THING OVER & OVER...SINCERELY JAMES STEWART”

19. On or about June 30, 2010: Membership agreements for Healthy Family Farms and Rawesome Food Club found at the respective locations both include this verbiage: “As a member, I completely reject and refuse all governmental standards...any governmental sanitation standards for food storage and display” and I am “out of the jurisdiction of any governmental department and it’s regulations...I refuse to testify against any and all members of the this club...however, I will testify against any governmental officer or employee who interferes in any manner with this club.”

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COUNT 5

On and between June 30, 2010 and May 18, 2011, in the County of Los Angeles, the crime of UNSANITARY CONDITIONS, in violation of FOOD & AGRICULTURE CODE SECTION 32907, a Misdemeanor, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER and JAMES CECIL STEWART, who did sell, give away, deliver or knowingly purchase or receive any milk or any product of milk which had been produced or handled in or by a dairy farm, milk products plant, carrier, store or depot that is in an unsanitary condition.

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COUNT 6

On and between March 27, 2010 and July 3, 2010, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER, JAMES CECIL STEWART, and EUGENIE VICTORIA BLOCH, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of UNLICENSED BUSINESS, in violation of FOOD & AGRICULTURE CODE SECTION 35011(a), a Misdemeanor, in that they engaged in any of the following businesses without obtaining a license from the director for each separate milk products plant or place of business that dealt in, received, manufactured, froze or processed milk or any product of milk and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, said defendants committed the following overt act and acts at and in the state of California.

OVERT ACTS

1. On and between January 1, 2008 and June 30, 2010, Sharon Ann Palmer operated a working farm called Healthy Family Farms, LLC, in Santa Paula, California, without the permits and licenses required by local, county and state officials for its milk, dairy and egg products.
2. Sharon Ann Palmer and co-conspirators James Cecil Stewart, Eugenie Victoria Bloch and others named and unnamed, assisted in the operation of Healthy Family Farms (HFF) and the distribution of its milk, dairy and egg products.
3. On and between March 27, 2010 and June 30, 2010, raw, unpasteurized goat milk and goat milk products processed and manufactured by HFF were distributed, sold, and delivered by and to, an unlicensed and unpermitted food facility known as Rawesome located on Rose Avenue in Venice, California.
4. Rawesome is operated by James Cecil Stewart.
5. On or about March 27, 2010: "Victoria" (later ID'd as EUGENIE VICTORIA BLOCH) gives Healthy Family Farms (HFF) brochure to "customer Treviso\La Rue" at a farmer's market in Santa Monica, CA, and tells her that she must become a CSA member to place orders for raw/unpasteurized dairy products. Orders must be placed in advance and that she, "Victoria," is the one who processes them.

6. On or about April 5, 2011: "Customer Bob Donnalley" receives a confirmation email from "Victoria" with a CSA application for HFF and tells him to complete it and bring \$50 to the farmer's market where he will receive a membership card.
7. On or about April 17, 2010: Woman at HFF booth identifies herself as "Victoria" and accepts membership application from Bob Donnalley and takes \$50 for the membership. She then gives him four unlabeled containers of dairy products and when asked "how fresh is it?" replies, "a couple of days."
8. On or about May 10, 2010: "Victoria" replies to an email sent by "customer Ward\Kennedy" and confirms his order for raw dairy products. She tells him that he must pick up his order at an "after hours" location at a Smart and Final parking lot in Santa Barbara.
9. On or about May 13, 2010: "Customer Treviso\La Rue" talks with male HFF vendor at farmer's market in South Pasadena who asks if "Treviso\La Rue" had heard of Rawesome Foods in Venice and described it as having the "best from around the world" in raw foods. The HFF vendor tells "Treviso\La Rue" that Rawesome is a private membership club that carries HFF products but has no web site because it wants to be "under the radar". The HFF vendor gives "Treviso\La Rue" an HFF brochure and writes the address of Rawesome on it. HFF brochure is the same as the one given to "Treviso\La Rue" by Victoria at Santa Monica farmer's market.
10. On or about May 15, 2010: Unknown female HFF vendor at Old Town Farmer's Market in Calabasas tells "customer LeCavalier\La Rue" that she has to be a CSA member in order to pick up raw dairy product. Female vendor says she is "not supposed to sell to non-members." When "LeCavalier\La Rue" tells vendor that "Victoria" said she could try goat dairy products before becoming a member, the vendor lets her buy two unlabeled goat cheeses and one pint of goat yogurt without becoming a member.
11. On or about May 15, 2010: HFF booth vendor at Santa Barbara farmer's market, ID'd as "Deb," tells "customer Ward\Kennedy" that it is "illegal" for her to sell unpasteurized dairy products at the location and that he must meet her at "after hours" location at Smart and Final parking lot.
12. On or about May 15, 2010: "Deb" is in beige colored Ford van license number 6GWT272 registered to HFF in the Smart and Final parking lot. "Customer Ward\Kennedy" overhears Deb tells another customer that the raw cow's milk is from "Rawesome Food." When "Ward\Kennedy" asks for his order, "Deb" searches through five ice coolers in the back of the van and pulls out the water-soaked order: six unlabeled containers of raw dairy products. She takes his money for his membership and the raw products and gives him a membership card.

13. On or about May 19, 2010: Two unidentified women at Rawesome Foods ask “customers Treviso\La Rue” and “Ward/Kennedy” if they are members upon entry. When they answer in the negative they are told that they may buy a day pass. A \$1 Day Pass signed by “Angie” is given to them, as well as a blank Club Membership Agreement form for the “Right To Choose Healthy Food’s Rawesome Club.” They receive a receipt for their purchase which reads, in part, “1 SHARON GOAT MLK QT \$7.95” and “1 SHARON GOAT WY QT \$6.95.”

14. On or about May 19, 2010: A large walk-in refrigerator in Rawesome has an area containing assorted dairy products with two large signs posted – one reads “Healthy Family Farms” and the other reads “Miller’s Organic Farms” from Pennsylvania. Unknown male employee at Rawesome tells them that the unpasteurized cow’s milk comes from Pennsylvania and the unpasteurized goat products are from “Healthy Family Farms” in Santa Paula.

15. On or about June 1, 2010: “Customer Robert Davis” receives an email from “Victoria” using email address [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com) telling him that “You’ll need to join our CSA to have access to the dairy products (legal and regulatory reasons), but you can place an order and sign up at the market and then pick up your order...I’m attaching our CSA brochure, which will give you some background, as well as the membership form.”

16. On or about June 1, 2010: Attached to “Robert Davis” email is a brochure titled Healthy Family Farms CSA that includes a photo of Sharon Palmer and which reads “We know you’ll enjoy the pasture-raised truly free-range...foods we offer.” The brochure lists prices for eggs, meat, poultry and dairy products and the email address for orders and membership as [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com).

17. On or about June 1, 2010: A membership agreement is attached to the email sent by “Victoria” to “customer Robert Davis” titled “Membership Agreement, Right To Choose Healthy Food’s Healthy Family Farms” and in the upper left hand corner lists Right to Choose Healthy Food, P.O. Box 176, Santa Monica, CA 90406-0176 and email: [optimal@earthlink.net](mailto:optimal@earthlink.net). The agreement notes that as a member “I completely reject and refuse all governmental food standards. I fully trust the board members of this club to properly oversee and manage the preparation, handling and packaging of the food in this club, including but not limited to raw meat, raw eggs, raw produce, raw juices, **raw dairy...**”

18. On or about June 2, 2010: email from Victoria at [healthyfamilyfarms@gmail.com](mailto:healthyfamilyfarms@gmail.com) to “customer Robert Davis” tells him that “I do need you to know that the first time or two that you order raw cow’s milk products, we need to add a \$5 service fee (because those products are ones we purchase from another farm, like us, all grass, all the time...all the goat dairy products come from our farm.)”

19. On or about June 30, 2010: Sharon Palmer tells DA Investigator Ken Ward while executing the search

warrant that James Stewart is the owner of Rawesome and that he has been to the farm (HFF) to pick up eggs and milk for Rawesome members.

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COUNT 7

On and between June 30, 2010 and May 18, 2011, in the County of Los Angeles, the crime of UNLICENSED BUSINESS, in violation of FOOD & AGRICULTURE CODE SECTION 35011(a), a Misdemeanor, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER, and JAMES CECIL STEWART, who engaged in any of the following businesses without obtaining a license from the director for each separate milk products plant or place of business that dealt in, received, manufactured, froze or processed milk or any product of milk.

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COUNT 8

On and between June 30, 2010 and May 18, 2011, in the County of Los Angeles, the crime of FOOD FACILITY WITHOUT A PERMIT, in violation of HEALTH & SAFETY CODE SECTION 114381 & 114387, a MISDEMEANOR, was committed by JAMES CECIL STEWART, who did operate a food facility without obtaining all necessary permits to conduct business.

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COUNT 9

On and between March 27, 2010 and May 18, 2011, in the County of Los Angeles, the crime of CONSPIRACY TO COMMIT A CRIME, in violation of PENAL CODE SECTION 182(a)(1), a Felony, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER, JAMES CECIL STEWART, and EUGENIE VICTORIA BLOCH, who did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of UNLABELED AND IMPROPERLY LABELED FOOD, in violation of HEALTH & SAFETY CODE SECTION 114089, a Misdemeanor, in that they sold, delivered, gave away, provided, and produced food that did not bear a label that complied with the labeling requirements prescribed by the Sherman Food, Drug and Cosmetic Law and that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, said defendants committed the following overt act and acts at and in the state of California.

OVERT ACTS

1. On and between January 1, 2008 and June 30, 2010, Sharon Ann Palmer operated a working farm called Healthy Family Farms, LLC, in Santa Paula, California, without the permits and licenses required by local, county and state officials for its milk, dairy and egg products.
2. Sharon Ann Palmer and co-conspirators James Cecil Stewart, Eugenie Victoria Bloch and others named and unnamed, assisted in the operation of Healthy Family Farms (HFF) and the distribution of its milk, dairy and egg products.
3. On and between March 27, 2010 and June 30, 2010, raw, unpasteurized goat milk and goat milk products processed and manufactured by HFF were distributed, sold, and delivered by and to, an unlicensed and unpermitted food facility known as Rawesome located on Rose Avenue in Venice, California.
4. Rawesome is operated by James Cecil Stewart.
5. On or about March 27, 2010: "Victoria" (later ID'd as EUGENIE VICTORIA BLOCH) gives Healthy Family Farms (HFF) brochure to "customer Treviso\La Rue" at a farmer's market in Santa Monica, CA, and tells her that she must become a CSA member to place orders for raw/unpasteurized dairy products. Orders must be placed in advance and that she, "Victoria" is the one who processes them.

6. On or about April 5, 2011: "Customer Bob Donnalley" receives a confirmation email from "Victoria" with a CSA application for HFF and tells him to complete it and bring \$50 to the farmer's market where he will receive a membership card.
7. On or about April 17, 2010: Woman at HFF booth identifies herself as "Victoria" and accepts membership application from "customer Bob Donnalley" and takes \$50 for the membership. She then gives him four unlabeled containers of dairy products and when asked "how fresh is it?" replies, "a couple of days."
8. On or about May 13, 2010: "Customer Bob Donnalley" picks up his order of raw milk products in unlabelled containers from a female vendor at the HFF booth in South Pasadena farmer's market.
9. On or about May 13, 2010: "Customer Treviso\La Rue" talks with male HFF vendor at farmer's market in South Pasadena who asks if "Treviso\La Rue" had heard of Rawesome Foods in Venice and described it as having the "best from around the world" in raw foods. The HFF vendor tells "Treviso\La Rue" that Rawesome is a private membership club that carries HFF products but has no web site because it wants to be "under the radar" The HFF vendor gives "Treviso\La Rue" an HFF brochure and writes the address of Rawesome on it. HFF brochure is the same as the one given to "Treviso\La Rue" by Victoria at Santa Monica farmer's market.
10. On or about May 15, 2010: "Deb" is in beige colored Ford van license number 6GWT272 registered to HFF in the Smart and Final parking lot. "Customer Ward\Kennedy" overhears Deb tells another customer that the raw cow's milk is from "Rawesome Food." When "Ward\Kennedy" asks for his order, "Deb" searches through five ice coolers in the back of the van and pulls out the water-soaked order: six unlabeled containers of raw dairy products. She takes his money for his membership and the raw products and gives him a membership card.
11. On or about May 19, 2010: Two unidentified women at Rawesome Foods ask "customers Treviso\La Rue and Ward\Kennedy" if they are members upon entry. When they answer in the negative they are told that they may buy a day pass. A \$1 Day Pass signed by "Angie" is given to them, as well as a blank Club Membership Agreement form for the "Right To Choose Healthy Food's Rawesome Club." They receive a receipt for their purchase which reads, in part, "1 SHARON GOAT MLK QT \$7.95" and "1 SHARON GOAT WY QT \$6.95."
12. On or about June 6, 2010: "Tina" working the HFF booth at the Ojai farmer's market retrieves five unlabeled containers from a cooler and confirms they are for "customer MacClean's". "Tina" tells "MacClean" that the glass bottle contained goat's milk and four plastic containers contained goat cheese, goat feta and

cream. Tina says the goat products come from **Sharon Palmer's farm in Santa Paula**. Tina accepts \$95 - \$50 for CSA membership and \$45 for products.

13. On or about June 30, 2010: Eggs labeled with stickers that read:  
Healthy Family Farms Santa Paula, California. Fresh-Free Range 8027A – Grade AA  
Pack Date 5/14/201 (134) Sell By: June 15  
Refrigerate after purchase  
Large

were found for sale at Rawesome. These labels were attached to box made by other commercial egg vendors.

14. On or about June 30, 2010: Sign at Rawesome –  
DEAR CUSTOMER,  
PLEASE RETURN ALL EGG CARTONS TO US.  
SHARON AT THE RANCH NEEDS TO RE-USE THEM.  
EVERY LITTLE (sic) HELPS  
THANK YOU

15. On or about June 30, 2010: Hand Printed Sign at Rawesome read:  
HEALTHY FAMILY FARMS  
FRESH GOAT CHEESE & YOGURT (with an arrow pointing to the racks of unlabeled bottles and plastic containers.) Tags are fixed to each shelf which read, for example: “goat kefir mild & local 17.50 QT” but there was nothing more to identify the contents of each jar or bottle.

\* \* \* \* \*

COUNT 10

On or about June 30, 2010, in the County of Los Angeles, the crime of UNLABELED AND IMPROPERLY LABELED FOOD, in violation of HEALTH & SAFETY CODE SECTION 114089, a Misdemeanor, was committed by HEALTHY FAMILY FARMS, LLC, SHARON ANN PALMER, and JAMES CECIL STEWART, who sold, delivered, gave away, provided, and produced food that did not bear a label that complied with the labeling requirements prescribed by the Sherman Food, Drug and Cosmetic Law.

\* \* \* \* \*

COUNT 11

On and between June 30, 2010 and May 18, 2011, in the County of Los Angeles, the crime of UNAPPROVED SOURCE, in violation of HEALTH & SAFETY CODE SECTION 114021(a), a Misdemeanor, was committed by JAMES CECIL STEWART, who obtained food from sources that did not comply with all applicable laws.

\* \* \* \* \*

COUNT 12

On or about June 30, 2010, in the County of Los Angeles, the crime of IMPROPER EGG TEMPERATURE, in violation of HEALTH & SAFETY CODE SECTION 114373, a Misdemeanor, was committed by JAMES CECIL STEWART, who failed to keep unpasteurized raw shell eggs at or below 45 degrees Fahrenheit at the food facility known as Rawesome in Venice, California.

\* \* \* \* \*



COUNT 13

On and between June 30, 2010 and July 3, 2010, in the County of Los Angeles, the crime of REMOVAL OF CLOSURE NOTICE, in violation of LOS ANGELES COUNTY CODE SECTION 8.04.943, a Misdemeanor, was committed by JAMES CECIL STEWART, who did willfully and unlawfully remove or fail to keep posted, the notice of closure issued by the Los Angeles County Health Officer.

\* \* \* \* \*

Counts one through 13 are filed pursuant to the authority of Penal Code section 781:

When a public offense is committed in part in one jurisdictional territory and in part in another, or the acts or effects thereof constituting or requisite to the consummation of the offense occur in two or more jurisdictional territories, the jurisdiction of such offense is in any competent court within either jurisdictional territory.



<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
HEALTHY FAMILY FARMS, LLC				\$0	
PALMER, SHARON ANN		4/14/1960		\$121,500	
STEWART, JAMES CECIL		7/26/1947		\$123,000	
BLOCH, EUGENIE VICTORIA		3/17/1953		\$60,000	

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant, the warrant is so ordered.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Judge of the Above Entitled Court

**FELONY COMPLAINT – ORDER HOLDING TO ANSWER – P.C. SECTION 872**

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendants guilty thereof, to wit:

*(Strike out or add as applicable)*

**HEALTHY FAMILY FARMS, LLC**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	FA 35283(a)			
2	FA 35283(b)			
3	PC 182(a)(1)	16-2-3		
4	PC 182(a)(1)	16-2-3		
5	FA 32907			
6	PC 182(a)(1)	16-2-3		
7	FA 35011			
9	PC 182(a)(1)	16-2-3		
10	HS 114089			

**SHARON ANN PALMER**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	FA 35283(a)			
2	FA 35283(b)			
3	PC 182(a)(1)	16-2-3		
4	PC 182(a)(1)	16-2-3		
5	FA 32907			
6	PC 182(a)(1)	16-2-3		
7	FA 35011			
9	PC 182(a)(1)	16-2-3		
10	HS 114089			

**JAMES CECIL STEWART**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	FA 35283(a)			
2	FA 35283(b)			
3	PC 182(a)(1)	16-2-3		
4	PC 182(a)(1)	16-2-3		
5	FA 32907			
6	PC 182(a)(1)	16-2-3		
7	FA 35011			
8	HS 114381 & 114387			
9	PC 182(a)(1)	16-2-3		
10	HS 114089			
11	HS 114021(a)			
12	HS 114373			
13	LC 8.04.943			

**EUGENIE VICTORIA BLOCH**

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
3	PC 182(a)(1)	16-2-3		
6	PC 182(a)(1)	16-2-3		
9	PC 182(a)(1)	16-2-3		

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
HEALTHY FAMILY FARMS, LLC				\$0	
PALMER, SHARON ANN		4/14/1960		— \$121,500	<i>W</i>
STEWART, JAMES CECIL		7/26/1947		— \$123,000	<i>W</i>
BLOCH, EUGENIE VICTORIA		3/17/1953		— \$60,000	<i>CHO</i>

It appearing to the Court that probable cause exists for the issuance of a warrant of arrest for the above-named defendant, the warrant is so ordered.

DATE: 30 JUNE '11

*[Handwritten Signature]*

Judge of the Above Entitled Court



C.H. REHM