

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCABAMA**

BREMERLEY FAMILY FARMS; WILLIAM
BREMERLEY,

Plaintiffs,

v.

ANIMAL ACTION NOW; BLAINE CARDILLO,

Defendants.

Case No. 3:21-cv-86753-RWS

**AFFIDAVIT OF WILLIAM BREMERLEY IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Being duly sworn, William Bremerley, deposes and states the following as true, under oath.

1. I am a resident of Leosville, Wiscabama. I am at least 18 years of age, of sound mind, and would testify as follows if called as a witness in this matter.
2. I am the owner and manager of Bremerley Family Farms. We are a family egg farm based in Leosville, Wiscabama. We take great pride in raising eggs that are nutritious and ethically raised, and in providing our customers with wholesome foods for their family breakfast tables.
3. The egg farm has been in my family for generations. It was started by my grandfather Joseph Bremerley, who started out with 10 chickens in a backyard coop, selling eggs to his neighbors and the church community.
4. My father expanded the egg farm, building a barn that would house 100 hens. When I was six years old, he built a second barn and added more hens to the barn, and he continued to grow the family business over the next 40 years.
5. Today, we care for approximately 300,000 hens on our farm, and use a tiered aviary cage system in which we can monitor each animal's food and water intake.
6. When my sister and I inherited Bremerley Family Farms from my father, I was determined to continue his legacy of high standards, including in animal care, food safety, biosecurity, and farm management. I have a degree in animal science from

the University of Wisconsin, and have taken numerous courses on animal husbandry best practices in the egg industry.

7. In fact, I am on the board of the American Egg Association, a nonprofit farmer membership organization that formulates best practices for the industry that are adopted by farms nationwide, in the areas of animal care, environmental sustainability, biosecurity, and general farm management.
8. Bremerley Family Farms is comprehensively monitored and audited by several animal care associations, including the American Humane Network. Not only do we follow high standards of animal care that we put in place, but we also have inspectors who come out to the farm to make sure we're not just doing it on paper, but living our values.
9. We have never received anything less than a full satisfactory passing grade in our many audits for animal care over the years. That is why, when I learned that a spy had been working in our farm, and then left and released false information stating that we were abusing animals, I was shocked, furious, and confused.
10. The supposed "employee," Blaine Cardillo (if that even is her real name), was out to get us from the very start. She was determined to find evidence that we were mistreating the chickens to turn over to her extremist group employer, Animal Action Now. She was more focused on doing that than she was on doing the job we hired and paid her to do.
11. I would never have hired her if we had known the truth about her intentions to destroy our company and the legacy of farming excellence we have built over the last 130 years.
12. The contention that animals at Bremerley Family Farm are abused or treated cruelly is false. It has to be. We are not only thoroughly inspected by animal welfare certifiers, but we have farmhands whose job it is to monitor animal health and report any incidents of injury, illness, or disease.
13. We also have a veterinarian with whom we have worked for the past 20 years. This veterinarian, Doctor Michael Zoolanger, has over 25 years of experience in farm animal veterinary care. He has worked with dozens of farmers, and provides an excellent level of care to his clients. Doctor Zoolanger has never said anything to me about animal care deficiencies, or mismanagement on our farm. He has visited our farm over 30 times since I have been managing it.
14. Thankfully, the investigator did not cause an outbreak of a deadly viral disease or any other serious physical damage to our facility. However, Ms. Cardillo's lies, and those of Animal Action Now, have destroyed our reputation in the business community, and made us a pariah.
15. After the release of their hit job videos, one of our largest customers, Vegman's grocery store, called me up and said that unfortunately, they'd have to terminate the contract with us, because according to the manager, they were just getting too much

pressure from activists, and it didn't look good for their business to be associated with Bremerley Family Farms.

16. I vigorously protested and explained that everything in the videos was false and was portraying our farm in a completely inaccurate light. I explained the many animal care standards and safeguards we have to ensure that the hens are treated humanely. But unfortunately, the Vegman's manager had his mind made up, and said his hands were tied.
17. The loss of the Vegman's contract was a huge blow for us. We sold roughly \$1.8 million worth of eggs to Vegman's every year, and now that revenue stream is just gone.
18. I have tried reaching out to several other large institutional egg buyers, including grocery chains, restaurant groups, and other such entities, but no one wants to be associated with us, no matter what I say about how false the allegations against us are.
19. Although I didn't know it before they filed their brief, apparently Animal Action Now is not content with us losing our biggest customer, but also wants us to be criminally prosecuted. *They* should be criminally prosecuted for lying and infiltrating my farm!
20. Although I haven't yet heard from the District Attorney, I look forward to telling him why this accusation against our farm is utterly false.
21. I am determined to restore the good name of the family farm that has been in my family for generations, and to ensure that Ms. Cardillo's and Animal Action Now's lies and misrepresentations do not prevent us from continuing to provide our customers with the nutritious, ethically raised food that they have come to expect from us.

May 2, 2022

_____*William Bremerley*_____