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February 27, 2008

William H. Bent
NOP Compliance Officer
Agricultural Marketing Service
United States Department of Agriculture
2202 Monterey Street
Fresno, CA 93721-3129

Re: Polyface, Inc.

Dear Mr. Bent:

Please be advised that this firm, on behalf of the Farm-to-Consumer Legal Defense Fund, represents Mr. Joel Salatin and his farming operation, Polyface, Inc. this matter. This letter is being written in response to your letter of February 5, 2008 to Mr. Salatin.

In your letter, you allege that Mr. Salatin and Polyface, Inc. are misrepresenting their poultry products as organic. That is not true. The sign that your letter refers to that was hung in the window of the Revolutionary Soup restaurant was not hung there by Mr. Salatin or Polyface, Inc., by anyone acting on their behalfs, nor was hung there at their request or suggestion or urging. Consequently, Mr. Salatin and Polyface, Inc. cannot be held liable for the actions of a third party.

With respect to your allegation that the "beyond organic" claim on Polyface, Inc.'s website is not authorized by the Organic Foods Production Act of 1990, we respectfully disagree. OFPA applies only to the labels on the products themselves. It does not apply to marketing claims made on websites or other literature. Moreover, "beyond organic" is not even a term that is protected by OFPA and the regulations adopted thereunder. The actual protected term is "certified organic."

Finally, to the extent the National Organic Program interprets OFPA to apply to websites, then Polyface, Inc. would be willing to change its website language to the following:

William H. Bent
February 27, 2008
Page 2

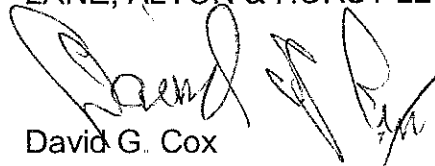
"Polyface, Inc. is not a "certified organic" operation because we believe that our production practices go beyond and exceed the organic standards promulgated by the National Organic Program. We believe that the NOP's so-called "organic" standards do not ensure a sustainable method of agricultural practices and do not ensure that the food grown in accordance with those standards provide for nutrient dense, healthy, and environmentally friendly foodstuffs. In addition, we believe that the NOP's "organic" standards have been co-opted by large-scale corporations and that many entities that are now "certified organic" are actually doing more harm than good not only to the environment, but also to the animals and people who consume them. Therefore, we at Polyface, Inc. believe that our production practices exceed and go beyond the standards of the NOP, we are proud that we are not "certified organic" because to be so certified is inconsistent with our philosophy," and are proud to call ourselves beyond organic.

We hope that this letter is a satisfactory response to your February 5, 2008 letter. If for some reason you still believe that OFPA or its enabling regulations prohibit Polyface, Inc. from advertising on its website that it is "beyond organic" I trust that you will let me know.

If you need anything further on this issue then please do not hesitate to contact me. Looking forward to hearing from you soon, I remain,

Respectfully,

LANE, ALTON & HORST LLC



David G. Cox

cc: Joel Salatin
Taaron Meikle
Mark Bradley, NOP Washington