

STATE OF WISCONSIN CIRCUIT COURT MONROE COUNTY
BRANCH

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 25-CX-_____

Complex Forfeiture: 30109

SPRING VALLEY HOLSTEINS, INC.,

and

ALAN FERRIES,

Defendants.

STIPULATION FOR JUDGMENT

Plaintiff State of Wisconsin brought this civil action against Defendants Spring Valley Holsteins, Inc. (SVH) and Alan Ferries for alleged violations of the State's manure runoff and pollutant discharge laws that occurred at SVH's livestock operation located at 17718 Mercury Ave, Norwalk, Wisconsin (Site).

The State of Wisconsin, SVH, and Alan Ferries now wish to settle this matter by agreement and avoid further litigation and therefore enter this Stipulation for Judgment (Stipulation).

IT IS STIPULATED AND AGREED by the State of Wisconsin, SVH, and Alan Ferries that this case shall be settled on the merits, with prejudice, on the following terms and conditions:

1. The parties to this Stipulation are the State of Wisconsin, SVH, and Alan Ferries.

2. The Circuit Court of Monroe County, Wisconsin (Court) has jurisdiction over the parties and subject matter of this action.

3. This Stipulation and the Order for Judgment as approved by the Court shall apply to and be binding on the parties and on the successors and assignees of the parties. No change in ownership or corporate or partnership status shall in any way alter the responsibilities of SVH or Alan Ferries under this Stipulation.

4. Judgment shall be entered in favor of the State of Wisconsin and jointly and severally against SVH and Alan Ferries in the total amount of \$120,000. This sum is comprised of forfeitures, statutory surcharges, costs, attorney fees, and Department of Natural Resources (DNR) costs as follows: forfeitures of \$16,920.07 as provided for in Wis. Stat § 281.98(1), the 26 percent penalty surcharge of \$4,399.22 pursuant to Wis. Stat. § 814.75(18), the 20 percent environmental surcharge of \$3,384.01 pursuant to Wis. Stat. § 814.75(12), the 1 percent jail surcharge of \$169.20 pursuant to Wis. Stat. § 814.75(14), \$25.00 in court costs pursuant to Wis. Stat. § 814.63(1), the \$13.00 crime laboratories and drug law enforcement surcharge pursuant to Wis. Stat. § 814.75(3), the \$68.00 court support services surcharge under Wis. Stat. § 814.75(2), the \$21.50 justice information system surcharge under Wis. Stat. § 814.75(15), attorney fees of \$5,000.00 pursuant to Wis. Stat. § 281.98(2), and DNR costs of \$90,000.00 pursuant to Wis. Stat. § 283.87(1).

5. SVH and Alan Ferries will pay a total of \$25,000.00 by checks payable to the Monroe County Circuit Court and delivered to the Monroe County Clerk of Court, Monroe County Courthouse, 112 South Court Street, Room 2200, Sparta, Wisconsin, along with cover letters to the Court identifying this case by name and case number. A copy of the cover letters shall be simultaneously mailed as proof of payment to Assistant Attorney General Valerie A. Black at the Wisconsin Department of Justice, Post Office Box 7857, Madison, Wisconsin 53707-7857. Payment shall be made in accordance with the following schedule:

- a. \$5,000.00 by March 15, 2028; and
- b. \$20,000.00 by September 15, 2028.

6. SVH and Alan Ferries will pay a total of \$5,000.00 in attorney fees by check payable to the Wisconsin Department of Justice and mailed to Assistant Attorney General Valerie A. Black at the address provided in paragraph 5 of this Stipulation by March 15, 2026.

7. SVH and Alan Ferries will pay a total of \$90,000.00 in costs for fish restitution by checks payable to the Wisconsin Department of Natural Resources. The checks shall be delivered to Margaret Hooper, FN/2, Department of Natural Resources, 101 S. Webster Street – GEF 2, Madison, Wisconsin 53703, along with a cover letter identifying this case by name and number. A copy of the cover letters shall be simultaneously mailed as proof of payment to Assistant Attorney General Valerie A. Black at the address provided in paragraph 5 of this Stipulation. Payment shall be made in accordance with the following schedule:

- a. \$15,000.00 by March 15, 2026;
- b. \$20,000.00 by September 15, 2026;
- c. \$20,000.00 by March 15, 2027;
- d. \$20,000.00 by September 15, 2027; and
- e. \$15,000.00 by March 15, 2028.

8. SVH and Alan Ferries shall be jointly and severally liable for payment of the judgment described in paragraphs 4 through 7 of this Stipulation.

9. The parties acknowledge that this Stipulation and the Order for Judgment set forth the entire understanding of the parties with respect to resolution of the violations alleged in the Complaint.

10. Compliance by SVH and Alan Ferries with their obligations under this Stipulation and the Order for Judgment shall constitute full release of their civil liability for the violations alleged in the Complaint.

11. Nothing contained in this Stipulation shall be construed as an admission of liability by SVH or Alan Ferries, or as a concession by the State regarding the veracity of the State's allegations.

12. SVH and Alan Ferries waive the requirement for formal service of an authenticated Summons and Complaint.

13. The Order for Judgment will be a final and appealable Order. However, the parties hereby waive their right to appeal the Order.

14. The Order for Judgment and Judgment may be entered incorporating the terms of this Stipulation without further notice, and the Judgment may be docketed, pursuant to Wis. Stat. § 806.10(1).

Dated this 22nd day of December 2025.

JOSHUA L. KAUL
Attorney General of Wisconsin

Electronically signed by:

s/ Valerie Black
VALERIE A. BLACK
Assistant Attorney General
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Dated this 11th day of December 2025.

Arndt, Buswell & Thorne, S.C.

Electronically signed by:

s/ Dan Arndt
Dan Arndt
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Attorneys for Defendants Spring Valley
Holsteins, Inc. and Alan Ferries