

FILED
09-30-2026
Juneau County
Clerk of Circuit Court
2026CX000001

STATE OF WISCONSIN

CIRCUIT COURT
BRANCH ____

JUNEAU COUNTY

STATE OF WISCONSIN,

Plaintiff,

v.

Case No. 26-CX-____

Complex Forfeiture: 30109

CENTRAL SANDS DAIRY, LLC,

Defendant.

STIPULATION FOR JUDGMENT

Plaintiff State of Wisconsin brought this civil action against Defendant Central Sands Dairy, LLC (Central Sands), for alleged violations of the State's wastewater discharge laws at Central Sands' large concentrated animal feeding operation (CAFO) located at N15927 County Road G, Nekoosa, Wisconsin 54457 (the Facility). The State of Wisconsin and Central Sands now wish to settle this matter by agreement and avoid further litigation, and therefore, enter into this Stipulation for Judgment (Stipulation).

IT IS STIPULATED AND AGREED by the State of Wisconsin and Central Sands 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 and Central Sands.

2. The Circuit Court of Juneau County, Wisconsin (Court) has jurisdiction over the parties and the 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 Central Sands under this Stipulation.

4. Judgment shall be entered in favor of the State of Wisconsin and against Central Sands in the total amount of \$245,000.00. This sum is comprised of forfeitures, surcharges, costs, and attorney fees as follows: forfeitures of \$146,171.77 pursuant to Wis. Stat. § 283.91(5); a 26 percent penalty surcharge of \$38,004.66 pursuant to Wis. Stat. § 814.75(18), a 20 percent environmental surcharge of \$29,234.35 pursuant to Wis. Stat. § 814.75(12), \$25.00 in court costs pursuant to Wis. Stat. § 814.63(1), a \$13.00 crime laboratories and drug law enforcement surcharge pursuant to Wis. Stat. § 814.75(3), a \$68.00 court support services surcharge pursuant to Wis. Stat. § 814.75(2), a 1 percent jail surcharge of \$1,461.72 pursuant to Wis. Stat. § 814.75(14), a \$21.50 justice information system surcharge pursuant to Wis. Stat. § 814.75(15), and attorney fees of \$30,000.00 under Wis. Stat. § 283.91(5).

5. Central Sands will pay \$215,000.00 by checks payable to Juneau County Circuit Court and delivered to the Juneau County Clerk of Court, 200 Oak Street, Mauston, Wisconsin 53948, along with cover letters identifying the case by name and number. A copy of the cover letters shall be simultaneously mailed as proof of payment to Assistant Attorney General Bradley J. Motl 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. \$31,250.00 by December 31, 2026;
- b. \$61,250.00 by March 31, 2027;
- c. \$61,250.00 by June 30, 2027; and
- d. \$61,250.00 by September 30, 2027.

6. Central Sands will pay \$30,000.00 in attorney fees by check payable to the Wisconsin Department of Justice and delivered to Assistant Attorney General Bradley J. Motl, at the Wisconsin Department of Justice, Post Office Box 7857, Madison, Wisconsin 53707-7857, by December 31, 2026.

7. By July 1, 2027, Central Sands shall abandon the Facility's waste storage facilities pursuant to, and in compliance with, the abandonment plans submitted by Central Sands to the Department of Natural Resources (DNR) on March 28, 2026, with revisions submitted to DNR on June 12, 2026, and the Conditional Approval of Plans & Specifications for Abandonment of the Waste Storage Facility and Digester Tank at Central Sands Dairy in T20N, R04E, Section 12, Armenia Township, Juneau County issued by DNR to Central Sands on June 17, 2026. Central Sands shall provide DNR written notice, by email to Ben Uvaas (Benjamin.uvaas@wisconsin.gov) and James Salscheider (james.salscheider@wisconsin.gov) at least five business days prior to commencing the work required by this paragraph. Central Sands shall allow DNR staff to be present at the Facility and observe the work required by this paragraph.

8. Central Sands estimates that the cost of completing the project described in paragraph 7 of this Stipulation is approximately \$315,000. The parties agree that the actual cost of the project may vary. Nothing in this paragraph shall be construed to require Central Sands to expend a specific amount to complete the project required in paragraph 7 of this Stipulation.

9. Central Sands waives the requirement for formal service of an authenticated Summons and Complaint.

10. 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.

11. Compliance by Central Sands with its obligations under this Stipulation and the Order for Judgment shall constitute full release of its civil liability for the violations alleged in the Complaint.

12. Nothing contained in this Stipulation shall be construed as an admission of liability by Central Sands, or as a concession by the State regarding the veracity of the State's allegations.

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 28th day of September 2026.

JOSHUA L. KAUL
Wisconsin Attorney General


BRADLEY J. MOTL
Assistant Attorney General
State Bar # 1074743

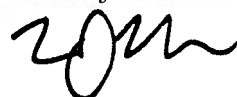
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Dated this 28th day of September, 2026.

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