

IT IS STIPULATED AND AGREED by the State of Wisconsin, Alliance, AREC, and U-Haul Wisconsin 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, Alliance, AREC, and U-Haul Wisconsin.

2. The Circuit Court of Winnebago 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 Alliance, AREC, or U-Haul Wisconsin under this Stipulation.

4. Judgment shall be entered in favor of the State of Wisconsin and against Alliance, AREC, and U-Haul Wisconsin in the total amount of \$75,000. The State of Wisconsin asserts that this sum is comprised of forfeitures, surcharges, and costs as follows: forfeitures of \$50,933.67 pursuant to Wis. Stat. § 285.87, a 26 percent penalty surcharge of \$13,242.76 pursuant to Wis. Stat. § 814.75(18), a 20 percent environmental surcharge of \$10,186.73 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 \$509.34 pursuant to Wis. Stat. § 814.75(14), and a \$21.50 justice information system surcharge pursuant to Wis. Stat. § 814.75(15).

5. Alliance will pay \$37,500 by check payable to the Winnebago County Circuit Court and delivered to the Winnebago County Clerk of Court, 415 Jackson Street (1st Floor), Post Office Box 2808, Oshkosh, Wisconsin 54903-2808 along with a cover letter identifying the case by name and number. A copy of the cover letter shall be simultaneously mailed as proof of payment to Assistant Attorney General Sarah C. Geers at the Wisconsin Department of Justice, Public Protection Unit, Post Office Box 7857, Madison, Wisconsin 53707-7857. Payment shall be made within 60 days after the Court signs the Order for Judgment.

6. AREC and U-Haul Wisconsin will collectively pay \$37,500 by check payable to the Winnebago County Circuit Court and delivered to the Winnebago County Clerk of Court, 415 Jackson Street (1st Floor), Post Office Box 2808, Oshkosh, Wisconsin 54903-2808 along with a cover letter identifying the case by name and number. A copy of the cover letter shall be simultaneously mailed as proof of payment to Assistant Attorney General Sarah C. Geers at the Wisconsin Department of Justice, Public Protection Unit, Post Office Box 7857, Madison, Wisconsin 53707-7857. Payment shall be made within 60 days after the Court signs the Order for Judgment.

7. AREC and U-Haul Wisconsin shall be jointly and severally liable for payment of \$37,500 of the judgment described in paragraphs 4 and 6 of this Stipulation.

8. Nothing contained in this Stipulation shall be construed as an admission of liability by Alliance, AREC, or U-Haul Wisconsin or as a concession by the State regarding the veracity of the State's allegations.

9. Alliance, AREC, and U-Haul Wisconsin waive 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 and the Notice of Violation dated August 9, 2018.

11. Compliance by Alliance, AREC, and U-Haul Wisconsin with their obligations under this Stipulation and the Order for Judgment shall constitute a full and final release of any and all liability for the violations alleged in the Complaint and the Notice of Violation dated August 9, 2018.

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

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

14. Upon entry of the Order for Judgment and Judgment and upon satisfaction of the payments set forth above, the State of Wisconsin shall file a Satisfaction of Judgment substantially in compliance with Wis. Stat. § 806.19. Thereafter, the Clerk of Court for Winnebago County, Wisconsin shall close the case consistent with its administrative procedures.

Dated this 15th day of January, 2021.

JOSHUA L. KAUL
Attorney General of Wisconsin

Electronically signed by Sarah C. Geers

SARAH C. GEERS
Assistant Attorney General
State Bar #1066948

Attorneys for the State of Wisconsin

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Dated this 18th day of March, 2020.

Electronically signed by Francis H. LoCoco

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Dated this _____ day of _____, 20__.

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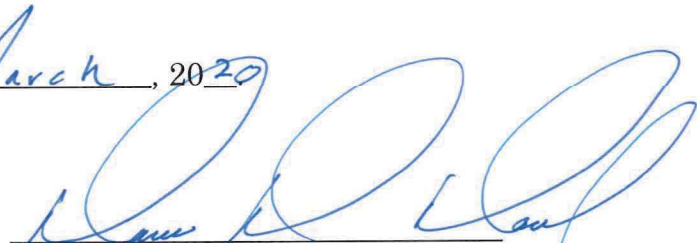
Dated this _____ day of _____, 20__.

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Dated this 3rd day of March, 2020



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