

**IN THE CIRCUIT COURT FOR COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION**

PEOPLE OF THE STATE OF ILLINOIS,  
*ex rel.* KWAME RAOUL, Attorney General  
of the State of Illinois,

Plaintiff,

v.

PRESTIGE FEED PRODUCTS LLC,

Defendant.

No. 25 CH 2892

**CONSENT ORDER**

8028

Plaintiff, PEOPLE OF THE STATE OF ILLINOIS, *ex rel.* KWAME RAOUL, Attorney General of the State of Illinois, the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY ("Illinois EPA"), and Defendant, PRESTIGE FEED PRODUCTS LLC, (collectively "Parties to the Consent Order"), have agreed to the making of this Consent Order and submit it to this Court for approval.

**I. INTRODUCTION**

This stipulation of facts is made and agreed upon for purposes of settlement only and as a factual basis for the Court's entry of the Consent Order and issuance of any injunctive relief. None of the facts stipulated herein shall be introduced into evidence in any other proceeding regarding the violations of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/1 *et seq.* (2024), and the Illinois Pollution Control Board ("Board") regulations, alleged in the Complaint except as otherwise provided herein. It is the intent of the Parties to this Consent Order that it be a final judgment on the merits of this matter.

**A. Parties**

1. On March 13, 2025, a Complaint was filed on behalf of the People of the State of

Illinois by Kwame Raoul, Attorney General of the State of Illinois, on his own motion and upon the request of the Illinois EPA, pursuant to Section 42(d) and (e) of the Act, 415 ILCS 5/42(d) and (e) (2024), against the Defendant.

2. The Illinois EPA is an administrative agency of the State of Illinois, created pursuant to Section 4 of the Act, 415 ILCS 5/4 (2024).

3. At all times relevant to the Complaint, Defendant PRESTIGE FEED PRODUCTS LLC was and is an Illinois corporation who operated an animal feed manufacturing plant at 601 E. Kensington Road, Mount Prospect, Cook County, Illinois (the "Facility").

**B. Allegations of Non-Compliance**

Plaintiff contends that the Defendant has violated the following provisions of the Act and Board regulations:

Count I: Violation of Section 9(a) of the Act, 415 ILCS 5/9(a) (2022), and Section 201.141 of the Board Air Pollution regulations, 35 Ill. Adm. Code 201.141

Count II: Violation of Section 24 of the Act, 415 ILCS 5/24 (2022), and Section 900.101 of the Board Noise Regulations, 35 Ill. Adm. Code 900.101

**C. Non-Admission of Violations**

The Defendant represents that it has entered into this Consent Order for the purpose of settling and compromising disputed claims without having to incur the expense of contested litigation. By entering into this Consent Order and complying with its terms, the Defendant does not affirmatively admit the allegations of violation within the Complaint and referenced above, and this Consent Order shall not be interpreted as including such admission.

**D. Compliance Activities to Date**

In December 2025, Defendant permanently ceased operations at the Facility.

## **II. APPLICABILITY**

1. This Consent Order shall apply to and be binding upon the Parties to the Consent Order. The Defendant waives as a defense to any enforcement action taken pursuant to this Consent Order the failure of any of its officers, directors, agents, employees or successors or assigns to take such action as shall be required to comply with the provisions of this Consent Order. This Consent Order may be used against the Defendant in any subsequent enforcement action or permit proceeding as proof of a past adjudication of violation of the Act and the Board Regulations for all violations alleged in the Complaint in this matter, for purposes of Sections 39 and 42 of the Act, 415 ILCS 5/39 and 42 (2024).

## **III. JUDGMENT ORDER**

This Court has jurisdiction over the subject matter herein and of the Parties to the Consent Order and, having considered the stipulated facts and being advised in the premises, finds the following relief appropriate:

### **IT IS HEREBY ORDERED, ADJUDGED AND DECREED:**

#### **A. Civil Penalty**

1. The Defendant shall pay a civil penalty of One Hundred and Eighty-Five Thousand Dollars (\$185,000). Payment shall be tendered by the time of entry of the Consent Order.
2. The civil penalty payment shall be made by certified check or money order payable to the Illinois EPA for deposit into the Environmental Protection Trust Fund ("EPTF").
3. The case name and case number shall appear on the face of the certified check or money order.

## **B. Future Compliance**

1. Concurrently with the entry of this Consent Order, Defendant shall dismiss with prejudice its First Amended Counterclaim filed on May 5, 2026.
2. This Consent Order in no way affects the responsibilities of the Defendant to comply with any other federal, state or local laws or regulations, including but not limited to the Act and the Board Regulations.
3. The Defendant shall cease and desist from future violations of the Act and Board Regulations that were the subject matter of the Complaint.

## **C. Enforcement of Consent Order**

1. This Consent Order is a binding and enforceable order of this Court. This Court shall retain jurisdiction of this matter and shall consider any motion by any party for the purposes of interpreting and enforcing the terms and conditions of this Consent Order. The Defendant agrees that notice of any subsequent proceeding to enforce this Consent Order may be made by mail and waives any requirement of service of process.

## **D. Release from Liability**

In consideration of the Defendant's payment of a One Hundred and Eighty-Five Thousand Dollar (\$185,000) penalty and its commitment to cease and desist as contained in Sections III.B.3 above, the Plaintiff releases, waives and discharges the Defendant and its agents, members, managers, officers, directors, attorneys, successors, and assigns from any further liability or penalties for the violations of the Act and Board Regulations that were the subject matter of the Complaint herein. The release set forth above does not extend to any matters other than those expressly specified in Plaintiff's Complaint filed on March 13, 2025. The Plaintiff reserves, and

this Consent Order is without prejudice to, all rights of the State of Illinois against the Defendant with respect to all other matters, including but not limited to the following:

- a. criminal liability;
- b. liability for future violations;
- c. liability for natural resources damage arising out of the alleged violations; and
- d. the Defendant's failure to satisfy the requirements of this Consent Order.

Nothing in this Consent Order is intended as a waiver, discharge, release, or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the State of Illinois may have against any person, as defined by Section 3.315 of the Act, 415 ILCS 5/3.315, other than the Defendant.

**E. Execution and Entry of Consent Order**

This Order shall become effective only when executed by all Parties to the Consent Order and the Court. This Order may be executed by the parties in one or more counterparts, all of which taken together shall constitute one and the same instrument. The undersigned representatives for each party certify that they are fully authorized by the party whom they represent to enter into the terms and conditions of this Consent Order and to legally bind them to it.

WHEREFORE, the parties, by their representatives, enter into this Consent Order and submit it to this Court that it may be approved and entered.

AGREED:

FOR THE PLAINTIFF:

PEOPLE OF THE STATE OF ILLINOIS  
*ex rel.* KWAME RAOUL, Attorney General  
of the State of Illinois

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

MATTHEW J. DUNN, Chief  
Environmental Enforcement/  
Asbestos Litigation Division

JAMES JENNINGS, Director  
Illinois Environmental Protection Agency

BY: *Stephen J. Sylvester*  
STEPHEN J. SYLVESTER, Chief  
Environmental Bureau  
Assistant Attorney General

BY: *Andrew Armstrong*  
ANDREW ARMSTRONG  
Chief Legal Counsel

DATE: 7/21/26

DATE: 07/17/2026

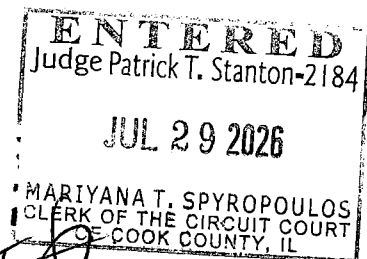
FOR THE DEFENDANT:

PRESTIGE FEED PRODUCTS LLC

BY: *[Signature]*  
Its: \_\_\_\_\_  
Joseph C. Pesoli, Authorized Agent.

DATE: 7/15/2026

ENTERED.



JUDGE

DATE: \_\_\_\_\_