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110 EAST MAIN STREET, SUITE 215  
P.O. BOX 1688  
MADISON, WISCONSIN 53701-1688  
Telephone (608) 266-1880  
TTY: (800) 947-3529  
Facsimile (608) 267-0640  
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**DISTRICT IV**

July 2, 2026

To:

Hon. Paul S. Curran  
Circuit Court Judge  
Electronic Notice

Alecia Kast  
Clerk of Circuit Court  
Juneau County Justice Center  
Electronic Notice

Margaret A. Waterman  
Electronic Notice

Steven Zaleski  
Electronic Notice

Katherine E. Campbell  
Campbell Law LLC  
P.O. Box 532  
Reedsburg, WI 53959

You are hereby notified that the Court has entered the following opinion and order:

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2026AP1072

In re the termination of parental rights to J.Z., a person under the age of 18: Juneau County DHS v. A.Z. (L.C. # 2025TP8)

Before Graham, P.J.<sup>1</sup>

**Summary disposition orders may not be cited in any court of this state as precedent or authority, except for the limited purposes specified in WIS. STAT. RULE 809.23(3).**

A.Z. appeals a circuit court order that terminated her parental rights to her child, J.Z. A.Z. argues that the court erroneously exercised its discretion in the dispositional phase when it concluded that termination of her parental rights was in J.Z.'s best interest. Specifically, A.Z. claims that the court failed to adequately consider one of the six factors that a court "shall consider" in making the disposition determination. WIS. STAT. § 48.426(3). Because the record

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<sup>1</sup> This appeal is decided by one judge pursuant to WIS. STAT. § 752.31(2)(e) (2023-24). All references to the Wisconsin Statutes are to the 2023-24 version.

demonstrates that the court adequately considered this factor (as well as the five other mandatory factors), I conclude that this case is appropriate for summary disposition pursuant to WIS. STAT. RULE 809.21, and I affirm.

Juneau County filed a petition seeking the termination of A.Z.'s parental rights on two grounds: that J.Z. had a continuing need of protection and services under WIS. STAT. § 48.415(2), and that A.Z. had failed to assume parental responsibility under § 48.415(6). Following a jury trial on grounds, the jury found that the County proved both grounds, meaning that the jury found A.Z. to be unfit. At the conclusion of an evidentiary hearing on disposition, the circuit court determined that it was in J.Z.'s best interest that A.Z.'s parental rights be terminated, and it entered an order doing so.

A.Z. does not claim that any errors occurred during the grounds phase of the proceeding and does not challenge the jury verdicts finding her to be an unfit parent. The sole issue she raises on appeal concerns the dispositional phase. *See Steven V. v. Kelley H.*, 2004 WI 47, ¶24, 271 Wis. 2d 1, 678 N.W.2d 856 (describing the “two-part statutory procedure” for an involuntary termination of parental rights in Wisconsin).

During the dispositional phase, a circuit court exercises its discretionary authority to decide whether termination of the parent's rights is in the child's best interest. WIS. STAT. § 48.426(2). The court's discretion is guided by § 48.426(3)(a)-(f), which provide a nonexclusive list of six factors that the court “shall consider.” *State v. B.W.*, 2024 WI 28, ¶7, 412 Wis. 2d 364, 8 N.W.3d 22. This court reviews a circuit court's decision on disposition for an erroneous exercise of discretion. *Gerald O. v. Cindy R.*, 203 Wis. 2d 148, 152, 551 N.W.2d 855 (Ct. App. 1996). An appellate court “will sustain a discretionary decision as long as the

circuit court examines the relevant facts, applies a proper standard of law, and, using a demonstrated rational process, reaches a conclusion that a reasonable judge could reach.” *Gahl v. Aurora Health Care, Inc.*, 2023 WI 35, ¶18, 413 Wis. 2d 418, 989 N.W.2d 561.

Here, A.Z. argues that the circuit court did not adequately consider the sixth listed factor, WIS. STAT. § 48.426(f). This factor asks “[w]hether the child will be able to enter into a more stable and permanent family relationship as a result of the termination, taking into account the conditions of the child’s current placement, the likelihood of future placements and the results of prior placements.” A.Z. acknowledges that the court considered this factor, but she contends that the court’s discussion of this factor was too conclusory. As A.Z. notes, the court stated that J.Z. and A.Z. “[ha]ve been separated now for 27 months, I think, and it appears [J.Z.] will be able to enter into a more stable and permanent family relationship when he is free to be adopted by the [foster family].” A.Z. calls this statement “terse and abbreviated,” and she argues that it does not reflect that the court gave “adequate consideration of and weight to” this factor. *State v. Margaret H.*, 2000 WI 42, ¶35, 234 Wis. 2d 606, 610 N.W.2d 475.

A.Z.’s argument ignores the circuit court’s other comments reflecting consideration of the WIS. STAT. § 48.426(f) factor. As the County points out in its response brief, the court also observed that, as at the time of the hearing, the foster parents had “been [J.Z.’s] foster parents now for the whole time since he was [removed from A.Z.’s care], or immediately thereafter.” The court noted that J.Z.’s placement had been “very stable” and added that “my sense from what I’ve read and heard in this case is that that level of stability is probably very good for him.” The court also observed that J.Z.’s half-siblings also live with the same foster family, and that it was “not aware of anything that’s coming that would change that.” A.Z. did not file a reply brief and has offered no argument about these additional statements by the court.

Each of these additional comments reflect that the circuit court examined the relevant facts, and its conclusion—that “it appears [J.Z.] will be able to enter into a more stable and permanent family relationship when he is free to be adopted by the [foster family]”—demonstrates a rational application of the correct legal standard. The court’s exercise of discretion must therefore be sustained. *Gahl*, 413 Wis. 2d 418, ¶18.

IT IS ORDERED that the order is summarily affirmed. *See* WIS. STAT. RULE 809.21.

IT IS FURTHER ORDERED that this summary disposition order will not be published.

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*Samuel A. Christensen*  
*Clerk of Court of Appeals*