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DISTRICT II

September 2, 2026

To:

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Circuit Court Judge
Electronic Notice

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Clerk of Circuit Court
Waukesha County Courthouse
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Strategic Funding Source, Inc.
120 West 45th Street, 4th Floor
New York, NY 10036

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

2025AP376 Marine Credit Union v. Kenneth R. Gerou (L.C. #2024CV1592)

Before Lazar, P.J., Grogan, and LoCoco, JJ.

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).

Matthew J. Crehan appeals pro se from a circuit court judgment of foreclosure entered in favor of Marine Credit Union. Based upon our review of the briefs and Record, we conclude at conference that this case is appropriate for summary disposition. *See* WIS. STAT. RULE 809.21 (2023-24).[1] For the following reasons, we affirm.

Marine granted a purchase money mortgage to Kenneth R. Gerou and Nikol S. Gerou (the Gerous) for a residential property, which Marine recorded with the office of the Register of Deeds for Waukesha County on January 21, 2016. In November 2022, Crehan and the Gerous entered into a consulting agreement that resulted in a bounced check to Crehan the Gerous never replaced. Crehan contends he filed a claim of lien on the Gerous' property by filing and recording a lien with the office of the Register of Deeds for Waukesha County in February 2023. In March 2024, the Gerous defaulted on their purchase money mortgage with Marine and remain uncured. Pursuant to their agreement, Marine demanded the entire balance of the note, instituted foreclosure proceedings, and properly joined Crehan and other interested parties as defendants. Crehan argues that in December 2024 he filed an "updated" "Common Law Commercial Lien" on the Gerous' property by filing and recording a lien with the office of the Register of Deeds for Waukesha County. The circuit court entered default judgment of foreclosure finding Marine's mortgage took first priority.

On appeal, Crehan argues his "Common Law Commercial Lien" takes first priority over Marine's previously recorded mortgage, as well as any other interests. We conclude that Crehan failed to adequately develop any argument that his claimed form of lien is valid, much less

[1] All references to the Wisconsin Statutes are to the 2023-24 version.

entitled to preference. The sole Wisconsin case Crehan cites, ***Jesse A. Smith Auto Co. v. Kaestner***, 164 Wis. 205, 159 N.W. 738, 739 (1916), involved a statutory lien on personal property. The out-of-state, nonbinding cases Crehan provides similarly involve either statutory liens or liens on personal property. *See* ***McMahon v. Lundin***, 58 N.W. 827 (Minn. 1894); ***Hewitt v. Williams***, 17 So. 269 (La. 1894); ***Drummond Carriage Co. v. Mills***, 74 N.W. 966 (Neb. 1898); ***Carr v. Dail***, 19 S.E. 235 (N.C. 1894).

If there is some reason these cases, all readily distinguishable, require or support reversal, it is not discernable from Crehan's briefs. We will not develop Crehan's argument for him. *See, e.g.*, ***Clean Wis., Inc. v. PSC***, 2005 WI 93, ¶180 n.40, 282 Wis. 2d 250, 700 N.W.2d 768 ("We will not address undeveloped arguments.").

Therefore,

IT IS ORDERED that the judgment of the circuit court is summarily affirmed. *See* WIS. STAT. RULE 809.21.

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

Samuel A. Christensen
Clerk of Court of Appeals