

FILED
02-06-2026
CLERK OF CIRCUIT
COURT
MARATHON COUNTY
2026CX000001

STATE OF WISCONSIN CIRCUIT COURT MARATHON COUNTY
BRANCH __

STATE OF WISCONSIN,

Plaintiff,

V.

Case No. 26-CX-_____

Complex Forfeiture: 30109

CRYSTAL FINISHING SYSTEMS, INC.,

Defendant.

STIPULATION FOR JUDGMENT

Plaintiff State of Wisconsin brought this civil action against Defendant Crystal Finishing Systems, Inc. (Crystal Finishing), for alleged violations of the State's air pollution control laws. The State of Wisconsin and Crystal Finishing 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 Crystal Finishing 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 Crystal Finishing.
2. The Circuit Court of Marathon 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 Crystal Finishing under this Stipulation.

4. Judgment shall be entered in favor of the State of Wisconsin and against Crystal Finishing in the total amount of \$350,000.00. This sum is comprised of forfeitures, surcharges, and costs as follows: forfeitures of \$238,008.50 pursuant to Wis. Stat. § 285.87(1), a 26 percent penalty surcharge of \$61,882.21 pursuant to Wis. Stat. § 814.75(18), a 20 percent environmental surcharge of \$47,601.70 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 \$2,380.09 pursuant to Wis. Stat. § 814.75(14), and a \$21.50 justice information system surcharge pursuant to Wis. Stat. § 814.75(15).

5. Crystal Finishing will pay \$350,000.00 by check payable to the Marathon County Circuit Court and delivered to the Marathon County Clerk of Court, 500 Forest Street, Wausau, WI 54403, 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 Bradley J. Motl at the Wisconsin Department of Justice, Post Office Box 7857, Madison, Wisconsin 53707-7857. Payment shall be made by February 27, 2026.

6. Crystal Finishing waives the requirement for formal service of an authenticated Summons and Complaint.

7. 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.

8. Compliance by Crystal Finishing 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.

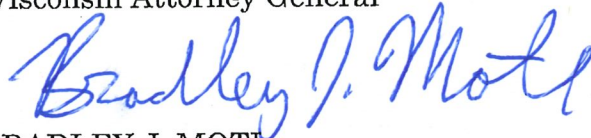
9. Nothing contained in this Stipulation shall be construed as an admission of liability by Crystal Finishing, or as a concession by the State regarding the veracity of the State's allegations.

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

11. 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 6th day of February 2026.

JOSHUA L. KAUL
Wisconsin Attorney General



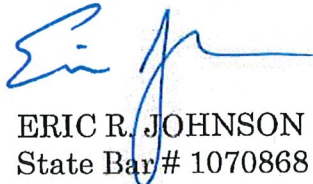
BRADLEY J. MOTL
Assistant Attorney General
State Bar #1074743

Attorneys for Plaintiff State of Wisconsin

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-0505
(608) 294-2907 (Fax)
bradley.motl@wisdoj.gov

Dated this 4th day of February 2026.

RUDER WARE, LLSC



ERIC R. JOHNSON
State Bar # 1070868

Attorneys for Defendant Crystal Finishing
Systems, Inc.

Ruder Ware, LLSC
500 North First Street, Suite 8000
Post Office Box 8050
Wausau, Wisconsin 54402-8050
(715) 845-4336
(715) 845-2718
ejohnson@ruderware.com