STATE OF WISCONSIN	**CIRCUIT COURT**	**FOND DU LAC COUNTY**
STATE OF WISCONSIN Plaintiff, vs. TAYLOR DENISE SCHABUSINESS [redacted] Green Bay, WI 54303 DOB: [redacted]/1997 Sex/Race: F/ Alias: Defendant.	DA Case No.: 2024FL003068 Assigned DA/ADA: Joseph Radish Agency Case No.: 24-8505 Court Case No.: ATN: **CRIMINAL COMPLAINT**	*For Official Use*

The undersigned law enforcement officer with the City of Fond du Lac Police Department being first duly sworn, states that:

Count 1: BATTERY BY PRISONERS, REPEATER

The above-named defendant on or about Wednesday, July 24, 2024, in the City of Fond du Lac, Fond du Lac County, Wisconsin, being a prisoner confined to the Taycheedah Correctional Institution, did intentionally cause bodily harm to VICTIM, an employee at the institution, without that person's consent, contrary to sec. 940.20(1), 939.50(3)(h), 939.62(1)(b) Wis. Stats., a Class H Felony, and upon conviction may be fined not more than Ten Thousand Dollars ($10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 939.62(1)(b) Wis. Stats., because **the defendant is a repeater**, having been convicted of 1st Degree Intentional Homicide, Mutilation of a Corpse and 3rd Degree Sexual Assault on 7/27/2023 in Brown County Case 22CF363, which conviction(s) remain of record and unreversed, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 4 years if the prior conviction was for a felony.

PROBABLE CAUSE:

Complainant bases the allegations of this complaint upon the report and investigation of officer(s) Lyndsey Luebke, of the City of Fond du Lac Police Department. Complainant and the officer(s) are reliable as sworn law enforcement officials. Officer Luebke's report states in part as follows:

On 7-24-2024 at approximately 7:43 PM Officer Luebke was dispatched to Taycheedah Correctional Institution 751 County Rd. K for a battery complaint. The reporting party advised a suspect who was Taylor Schabusiness, DOB [redacted]/1997, attacked a sergeant. Upon arrival, Officer Luebke met with VICTIM, who briefly told Officer Luebke she did go to the hospital due to the incident. Officer Luebke then met with Captain Andrew Rodriguez who advised the whole incident was recorded on body camera.

Officer Luebke then spoke with VICTIM asked if it caused her pain when Taylor pushed her. She stated yes. VICTIM did not consent to that pain. Officer Luebke asked if she would like to pursue charges and she said yes. VICTIM advised she would fill out the form for medical release as she did go to the hospital due to her injuries.

Officer Luebke asked VICTIM what happened. VICTIM said that Taylor requested access to care because of a staple in her arm. VICTIM brought the nurse down to the door to try and assess it without having to take Taylor out of her cell. The nurse said she would need Taylor to come to the medical room. VICTIM brought Taylor to the medical room and got her up on their table. The nurse got the tray and started to get the tweezers to take out the staple. That is when Taylor lunged at the nurse. VICTIM said she went and got Taylor down so the nurse was able to exit the room. VICTIM said Taylor continued to struggle with the tray that the nurse had. VICTIM had said earlier that her head was hit but was not concussed, that she had bruised ribs, and pointed to her arm saying that it hurt.

It should be noted, VICTIM was also exposed to the OC spray when Taylor was sprayed during the altercation.

Officer Luebke spoke with the nurse who was identified as WITNESS 1 and asked her if she was injured or had any pain. WITNESS said she was feeling a little in her shoulder but was not exactly sure. WITNESS said she did not need to go to the doctor and she did not consent to the pain. Officer Luebke asked If WITNESS would like to pursue charges and she was unsure if she wanted to.

Officer Luebke asked what happened. WITNESS said she got a call for an access to care because Taylor had a staple in her arm. WITNESS advised she was told that Taylor fell on the staple. WITNESS went on to say the officer (VICTIM) had handcuffed Taylor and met them in the medical room as WITNESS had to sterilize the tweezers. WITNESS said she remembered Taylor was chuckling the whole time and WITNESS asked Taylor what was so funny. Taylor then responded nothing was funny. WITNESS said she told Taylor that it might hurt a little bit and she took the tweezers to get it out and as soon as she made contact with the tweezers to the staple, Taylor grabbed her arm and pushed WITNESS out of the way. Taylor then lunged out of the chair. WITNESS said she heard the tray too and then at that point she went for help. WITNESS indicated the medical room is in a secluded hallway and she believed that no one knew what was going on at that point.

WITNESS confirmed that she is employed as a nurse on the correctional staff and that when this incident happened she had her nurse badge on and that Taylor is familiar with who she is as witness gives Taylor her medications.

Captain Rodriguez asked Taylor if she wanted to speak to Fond du Lac Police and she came to the door. In an interview with Officer Luebke, Taylor said when the nurse pulled the staple out she jumped and hit her because the staple caused Taylor pain. Taylor did not remember anything after that.

Supplemental Narrative
On 9-1-2024 at approximately 20:19 PM Officer Luebke received an email from Cpt. Rodriguez advising they uploaded the video to a flash drive for her to pick up. The video was of a body worn camera that VICTIM had on and activated during the incident. Below is a description of the video. All times mentioned are approximate times from the date 7-24-24:

2:33:53 -VICTIM and Taylor arrive at the nurse room
2:33:56 – When VICTIM and Taylor walk in the room, WITNESS asks Taylor 'what's funny' as Taylor sits on the medical bed. Taylor replies and it's inaudible. WITNESS then responds 'you're laughing'
2:34:18 - WITNESS starts doing something with her hands out of video frame (believed to be starting to remove staple from Taylor's arm). **Taylor then pushes WITNESS**
2:34:21 -**VICTIM steps in and Taylor grabs a small metal table and swings it at VICTIM.**
2:34:25 - VICTIM yells 'stop resisting' and attempts to control Taylor by pushing her into the wall. A struggle between Taylor and VICTIM ensues
2:34:40 - VICTIM OC sprays Taylor. Taylor is then crouched on the ground in the middle of the nurse room
2:34:53 - Taylor gets back up. VICTIM starts to go hands on again to try and control Taylor. Taylor then sits/crouches back down to the floor
2:35:07 - VICTIM backs out of the room gagging from presumed to be OC exposure. Other staff members from TCI start to arrive.
2:36:20 - VICTIM goes back into the room asking Taylor if she was ok and to 'stay on the ground... please'
2:36:31 - Sgt. Keener leaves the nurse room again gagging, other officers start assist with Taylor
2:37:21 - Sgt. Keener is in the hallway still. From in the nurse room another officer is heard yelling 'stop resisting'
2:37:40 - Sgt. Keener goes back into the nurse room to try and assist and provide leg restraints. Other staff members wave her out. 2:38:12 - Sgt. Keener walks away from nurses room and meets up with Kristin who advised Sgt. Keener they were calling an ambulance. Kristin then leads Sgt. Keener to a set of stairs and other staff members

Based on the foregoing, the complainant believes this complaint to be true and correct.

Subscribed and sworn to before me on 11/22/24
Electronically Signed By:
Hannah M. Krueger
Assistant District Attorney
State Bar #: 1139478

Electronically Signed By:
Matthew Bobo
Complainant