

STATE OF WISCONSIN

CIRCUIT COURT  
BRANCH II

BROWN COUNTY

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STATE OF WISCONSIN,

Plaintiff,

vs.

Case No. 22-CF-363

TAYLOR D. SCHABUSINESS,

Defendant.

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**MOTION FOR MODIFICATION OF BAIL**

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**TO: BROWN COUNTY DISTRICT ATTORNEY'S OFFICE**

***PLEASE TAKE NOTICE THAT*** the defendant, appearing specially by her attorney, Christopher T. Froelich, and reserving his right to challenge the Court's jurisdiction, moves the Court to **modify the current \$2,000,000.00 cash bond which was imposed on March 1, 2022 down to a significantly reduced cash bond between \$500,000.00 to \$1,000,000.00 with all appropriate conditions, including Crime Justice Services and GPS Monitoring.** This motion is brought pursuant to the 8<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution; article I, sections 6 and 8 of the Wisconsin Constitution; and Wis. Stats. § 969.

AS GROUNDS, the defendant asserts:

1. The defense seeks to reduce the current \$2,000,000.00 cash bond down to between a \$500,000.00 to \$1,000,000.00 cash bond with applicable conditions. Upon information and belief, the defendant could have a GPS electronic monitoring device installed on her ankle while the case is pending so that her whereabouts could be tracked at all times. **The defendant has been in custody since February 23, 2022.** The defense argues that the current cash bond is arbitrary and capricious. The current bond is a substitute for a pre-trial detention as this defendant does not have the financial resources with which to post the bond. The defendant has resided at 1130 Moraine Way, Green Bay, WI 54303. The defense argues that the bond should be reduced due to the length of time that this case has been pending and due to the other reasons set forth herein.
2. The defendant, Taylor D. Schabusiness (DOB 11-23-97), is 25 years old. She is the mother of 1 child – Mateo Coronado (DOB 10-03-21), age 2. Her child currently resides in Texas with the paternal grandparents. The father of her child is Warren Schabow who is currently in custody at a Federal Detention Center. The defendant previously lived in

Temple, Texas. The defendant reports that she was married to Warren Schabow on 02-14-20 which marriage is apparently still in-tact. The defendant attended Cotulla High School in Texas and graduated in 2016. The defendant attended Grand Canyon University where she studied electronics/computers for 6-months.

3. The defendant reports that her mother, Marla, died in approximately 2009 due to cirrhosis and alcoholism which was extremely difficult for the defendant. Her father is Arturo Coronado, Sr. and he resides at 1130 Moraine Way #10, Green Bay, WI 54303. The defendant has family in the Green Bay community. The defendant could potentially reside with her father during the pending of the action.
4. The defendant was born in Chicago, Illinois. The defendant was raised by her parents until age 11. At the time, her family relocated to Wisconsin. The defendant does have 1 brother. Taylor attended grades K to grade 4 at the Milbrun Elementary School in Illinois. During her 4<sup>th</sup> grade year, her family relocated to Wisconsin, where she completed 4<sup>th</sup> grade at Forest Glen Elementary School. Taylor attended Lineville Intermediate School for grades 5 and 6. She completed grades 7 and 8 at Bayview Middle School. Taylor attended Bayport High School between grades 9 and 11. During 12<sup>th</sup> grade, Taylor was apparently expelled from school for fighting with a female student. She then moved to Cotulla, Texas, where she completed her senior year there while living with her paternal grandparents. Taylor completed her secondary education with an estimated GPA of 3.1 cumulative. The defendant has attended a substantial amount of her schooling in the State of Wisconsin.
5. The defendant has worked for a sandwich shop as a teenager. She worked as a seasonal employee for Shopko Optical. Taylor worked for Saputo Cheese from January 20, 2018 to February 11, 2020. She worked there as a machine operator for this Wisconsin company. The defendant has held employment in the State of Wisconsin. The defendant has many ties to the Wisconsin community.
6. The defense asserts that the defendant needs to receive in-patient mental health treatment. The current cash bond is a substitute for a pre-trial detention as the bond amount is so arbitrary. The defense assert that the defendant does suffer from major mental health issues as follows according to Dr. Deborah Collins, Ph.D. evaluation dated April 7, 2022 which states in pertinent part:

“The defendant recalled first receiving mental health treatment during her 7<sup>th</sup> grade year, related to attention and concentration problems, and acting out behaviors in a school setting. She was recommended for evaluation and treatment by teachers or other school officials. According to the defendant, she was then initiated on medications such as Vyvanse and Adderall to address symptoms presumed to stem from ADD or ADHD. She was later also prescribed a mood stabilizer (e.g. Lamictal), an antidepressant, and an antipsychotic (e.g. Abilify) medication. She continued to receive psychiatric treatment to the age of 18. She then weaned herself off of medications, which she associated with negative side effects. She recalled, “I felt like a zombie.” It was also during her 7<sup>th</sup> grade year that she was psychiatrically hospitalized for the first time, after she attempted suicide. She recalled that she placed a knife to her throat and her father “walked in” and interrupted her attempt. According to the defendant, in April and May 2021, she was psychiatrically hospitalized at the Brown County Mental Health Center, which police were summoned to her home. During that episode of care, she was identified with diagnoses of Post-traumatic stress disorder (PTSD) and Bipolar disorder. She referred to the examiner to other mental health professionals for the

basis of both diagnoses. The defendant's comments suggest that, in 2021, she may have been the subject of a civil commitment. Ms. Schabusness referred specifically to past diagnoses of severe depression, ADD, ADHD, Bipolar disorder and PTSD.”

The defense asserts that the defendant should be released to participate in psychiatric and other mental health treatment. The current cash bond is simply out of reach for the defendant and posting that bond results in an impossibility. This defendant has serious mental health treatment needs that cannot be met in the Brown County Jail setting.

7. The defense argues that other defendants have received substantially lower cash bonds for homicide charges. See **Sheboygan County Case No. 20-CF-84** – Cash bond set at **\$500,000.00**.
8. The defendant asserts that the \$2,000,000.00 cash bond previously set in Brown County is excessive and is arbitrary and capricious. The defendant does not have the ability to post \$2,000,000.00 cash as the defendant is indigent. **It does not appear that the defendant has ever asked for a bail reduction since bond was imposed on March 1, 2022.** The defendant has been sitting in the Brown County Jail awaiting trial for approximately 13 months. The defendant is afforded the presumption of innocence under the Wisconsin and U.S. Constitution throughout this court process. **The defendant does not have the financial resources to post the \$2,000,000.00 cash bond.** The defendant may potentially be able to participate in further psychological testing and undergo psychiatric treatment in a mental health facility.
9. The defendant requests a formal Motion to Modify Bail hearing to address all issues in this bail motion.

Dated this 26th day of April, 2023.

**FROELICH LAW OFFICES, LLC:**

By: 

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