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June 18, 2024

The Honorable Emily Lonergan
Outagamie County Circuit Court, Branch II
Justice Center – 2nd Floor
320 S. Walnut St.
Appleton, WI 54911

RE: Supervised Release Plan – Paul Schabow (Outagamie County Case No 96-CI-01)

To the Honorable Emily Lonergan:

On June 7, 2024, Washington County (the “County”) filed a Notice of Motion and Motion to Intervene (the “Motion”) in the above referenced matter. The Town of Trenton now files this letter as a non-party in support of the County’s Motion for the reasons stated below.

BACKGROUND

According to the Department of Health Services’ (“DHS”) May 31, 2024, Supervised Release Plan, Mr. Schabow was committed as a Sexually Violent Person under Wisconsin Chapter 980 on July 18, 1997. On August 26, 2013, Mr. Schabow was placed on supervised release at a Community Based Residential Facility (“CBRF”) located in Outagamie County but in 2018 was placed into custody for rule violations and Court ordered to participate in an alternative to revocation (“ATR”) at Sand Ridge Secure Treatment Center (“SRSTC”). SRSTC is a secure treatment facility operated by DHS’ Division of Care and Treatment Services and serves “[m]en who have a history of sexual violence and mental health needs committed under Wis. Stat. ch. 980.”¹

On June 17, 2019, Mr. Schabow was released back into the community onto supervised release into a CBRF located in Dane County but was *again* placed back at SRSTC in June 2021 on another ATR. Since October 2022, DHS and Inclusa, a managed care organization, have been working to identify an adult family home or CBRF in Outagamie County. On March 13, 2024, this Court found good cause for DHS to look outside Outagamie County for placement for Mr. Schabow.

TOWN OF TRENTON POSITION

Specifically with respect to the County’s Motion, it is critical that Washington County (and by extension the Town) has a voice in the process. The Town fully supports the County’s arguments as presented to the Court in its Motion. The Petitioner itself wrote that it “believes that Washington County must be afforded the opportunity to be heard and object if placement is identified in Washington County.” *See* Washington County Motion at 2. As noted by the County, it has a direct interest in the safety and security of its communities and thus, per the *McGee* decision it is entitled

¹ <https://www.dhs.wisconsin.gov/srstc/index.htm> (last visited June 14, 2024).

to a meaningful opportunity to be heard directly by the court.” *Id.* (see also *Helgeland v. Wisconsin Muns.*, 2008 WI 9, ¶¶38-39, 307 Wis. 2d 1, 745 N.W.2d 1).

In addition, the Town wishes to reiterate the facts as presented in the County’s Motion. According to a June 11, 2024 Washington County Sheriff’s Office Press Release, Sheriff’s Office staff made contact with 122 homes that are within a 1,500 foot radius from the proposed placement of Mr. Schabow at “A Passion for Caring, LLC” owned residence at 6893 Eastwood Trail in the Town of Trenton (the “Proposed Residence”). Pursuant to Wis. Stat. § 980.08(dm)a., a county must “ensure that the person’s placement is into a residence that is not less than 1,500 feet from any school premises, child care facility, public park, place of worship, or youth center.” Here, there are at least two properties with vulnerable populations that fall squarely within the statutory 1,500 foot radius.

First, Laurence Stockhausen Park is located approximately **1,195 feet** from the Proposed Residence.² The Park is owned and operated by the Town and includes four separate pieces of playground equipment. Ex. A. Second, an in-home daycare facility operated by Dawn Steinmetz sits a mere **376 feet** from the Proposed Residence.

The Town of Trenton is a quiet community of 4,400 residents who value their safety and security. The Town and its leadership prioritize safety and security by employing a full-time Town police force and supplements and works closely with the Washington County Sheriff’s Office and the police forces from neighboring communities. Placing Mr. Schabow at the Proposed Residence within close proximity to both an in-home daycare facility and a public park frequented by area residents and their children would place a strain on Town resources and could place its residents at risk.

For these reasons the Town supports the County’s Motion and stands ready to provide any additional information the Court needs to adjudicate this matter.

Respectfully submitted,



Mr. Michael Lipscomb
Town of Trenton Chairman



Attorney Jacob J. Curtis
HJC Law & Consulting, LLC
Wisconsin Bar #1072735
Town of Trenton Attorney

CC: Washington County Corporation Counsel Brad Stern
DHS Supervised Release Program Liaison Scott Timm
Washington County Sheriff Martin Schulteis

² While the County’s June 7, 2024 Answer identifies the address of Laurence Stockhausen Park as 6939 Beck Lane, the Google Maps link associated with the Park on the Town’s website identifies the address as 6968 Beck Lane.