

FILED
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Clerk of Courts
Fond du Lac County WI
2024CF000055

STATE OF WISCONSIN	CIRCUIT COURT	FOND DU LAC COUNTY
STATE OF WISCONSIN	Plaintiff,	DA Case No.: 2023FL002773 Assigned DA/ADA: Eric J. Toney Agency Case No.: 23-4861 Court Case No.: ATN:
vs.		
TAYLOR L SANCHEZ 10720 Antioch Rd Trevor, WI 53179 DOB: 12/01/1995 Sex/Race: F/U Alias:		CRIMINAL COMPLAINT
Defendant.		
		<i>For Official Use</i>

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

Count 1: FIRST DEGREE INTENTIONAL HOMICIDE

The above-named defendant on or about Wednesday, July 19, 2023, in the City of Fond du Lac, Fond du Lac County, Wisconsin, did cause the death of VICTIM 1, with intent to kill that person, contrary to sec. 940.01(1)(a), 939.50(3)(a) Wis. Stats., a Class A Felony, and upon conviction shall be sentenced to imprisonment for life.

PROBABLE CAUSE:

- 1) Complainant bases this complaint upon the reports and investigation of Officer Barrett, Det. Mikulec, and Det. Deering all of the Fond du Lac Police Department. Complainant, Officer Barret, Det. Mikulec, and Det. Deering are all reliable as sworn law enforcement officials.

TCI INITIAL RESPONSE

- 2) Complainant reports that Officer Barrett reports on July 19, 2023, he responded to Taycheedah Correctional Institution (TCI), located at 751 County Road K., in the City and County of Fond du Lac, Wisconsin. At that location, Officer Barrett observed Victim 1, an inmate at TCI, who was deceased and lying on the floor surrounded by a puddle of blood. Officer Barrett observed this in cell 410. Cell 410 was Victim 1 and Taylor Sanchez, the above named defendant's cell. Prior to Officer Barrett's arrival, staff at TCI told him that Taylor Shanchez had called using the intercom and said something to the effect of that she believed she had killed her cellmate. Staff was aware that cell 410 was locked at the time Taylor Sanchez used the intercom. Staff arrived at the cell to find only two people, Victim 1 deceased and Taylor Sanchez alive within the cell. TCI staff then removed Taylor Sanchez from the cell and placed her in an isolation cell.

AUTOPSY

- 3) Complainant further reports that Det. Mikulec reports on July 19, 2023, Victim 1 was prepared to be removed from her cell and taken to the medical examiner's office. Det. Mikulec reports on July 20, 2023, he attended the autopsy of Victim 1 performed by Dr. Adam Covach, a Forensic Pathologist at the Fond du Lac Medical Examiner's Office. Detective Mikulec spoke with Dr. Covach about the death. Dr. Covach stated that Victim 1 had skull fractures too numerous to count. Dr. Covach also commented on rib fractures, 34 in total. Dr. Covach's provisional autopsy findings noted in part the following:

- 1) Multiple injuries

A) Closed head injuries

1) Innumerable comminuted fractures of calvarial vault, base of skull and facial bones ("Eggshell fractures")

a) Associated Findings

i) Facial and scalp contusions, abrasions and lacerations

ii) Brain matter coming out of laceration by left eye

iii) Multiple brain lacerations

iv) Diffuse subdural hemorrhage

B) L clavicle fracture

C) Bilateral rib fractures (Left right left lower)

1) Associated pleural contusions and lung laceration

D) Contusions and lacerations on arms, chest and abdomen

E) Aspirated blood

II) Status post resuscitation

III) Toxicology Pending

- 4) On August 22, 2023, Det. Mikulec received the Fond du Lac Medical Examiner's Office Autopsy Protocol report with four attachments The autopsy protocol lists the cause of death as "Closed head trauma."
- 5) The autopsy report notes a long list of injuries. However, beside the head trauma, when focusing on the torso, 34 separate rib breaks, a broken left should blade, and multiple contusions.

WITNESS INMATE 1

- 6) On July 21, 2023 Witness Inmate 1 told Detective Mikulec that on the day of the incident that she heard Victim 1 yell but it wasn't a full word. Witness Inmate 1 stated after she heard the partial word then, Witness Inmate 1 starts smashing her right fist into her left palm and does that 4 times and heard a possible grunt. Witness Inmate 1 thought Victim 1 and Sanchez were "farting" around but then goes back to smashing her fist into her palm 9 more times. Witness Inmate 1 says "She was hitting her for about two minutes." Inmate 1 adds "she hit her about 60 to 70 times!". Witness Inmate 1 says she wasn't counting, she was "building a rhythm".
- 7) Witness Inmate 1 says it crosses her mind that somebody is hurting someone and started snapping her fingers to mimic the noises she heard. She then says (after two snaps) that there is a pause. She snaps her fingers three more times and says there is another pause.
- 8) Witness Inmate 1 says she believes somebody is getting hurt but, nobody else in the wing seemed to be concerned so Witness Inmate 1 believed it was her imagination.
- 9) Witness Inmate 1 says after more noises, somebody in one of the cells asked, "Hey, are you guys okay"? The person then asks, "Cause what's that noise"? Witness Inmate 1 said nobody answered. But, Witness Inmate 1 adds that while this person is asking about the welfare of the person in the wing, Inmate 1 says

the noises are still going on so, Witness Inmate 1 believed the person causing the noises did not hear the question.

- 10) Witness Inmate 1 obtained a chair in her cell and looked out her cell door. Witness Inmate 1 said there was "No yelling, no screaming, no loud breathing, no nothing". Witness Inmate 1 said the noises "were calm" adding, it was "eerie".
- 11) Witness Inmate 1 believed, "Taylor must have hit her button (intercom)" and a guard arrived to the cell of Sanchez wearing gloves.
- 12) Witness Inmate 1 says she believes she heard Taylor Sanchez say "I think I killed my cellmate" or "Roommate".
- 13) Witness Inmate 1 says she saw Sanchez bringing brought out of the cell. Inmate 1 says "I see her hands are full of blood". Witness Inmate 1 says when Sanchez was coming out of the cell, she was looking, "very calmly". Witness Inmate 1 says the look on Sanchez's face was "She was not there". Det. Mikulec asked if the look was a blank look and In Witness Inmate 1 said, "Completely".

WITNESS INMATE 2

- 14) Witness Inmate 2 informed Detective Mikulec that she was in her cell with her earphones on watching world news. Witness Inmate 2 says she heard a "Banging, crunching sound" so she took off her earphones. Witness Inmate 2 thought the noise was somebody crunching coffee (flattening the coffee packets to make the coffee diffuse more in the water).
- 15) Witness Inmate 2 says this went on for a "couple of minutes". She adds there was no yelling, screaming, fighting, nothing. Witness Inmate 2 says her cellmate pounded on the wall of 410 and the crunching stopped.

WITNESS INMATE 3

- 16) Witness Inmate 3 said, "I can just remember hearing it happen" and started to tear up when asked about the incident. Witness Inmate 3 said she heard scuffle. She then adds that she hears a noise, "a yelp or a sound of a woman voice" and the noise sounded "It sounded like someone kicking something".
- 17) Witness Inmate 3 says heard "Mr. Maugham" come down and tell Sanchez to put the cup down. Det. Mikulec asked for clarification on the term "scuffle" and Witness Inmate 3 says it sounded like, "things being dropped" and added the term "wrestling". Witness Inmate 3 says that fights happen in the prison and she knows the sound of a fight starting. Det. Mikulec asked her who made the "yelp" noise and Witness Inmate 3 said, "It sounded like [Victim 1]".
- 18) Witness Inmate 3 says "It sounded like someone was just kicking, just kicking". She added "it was so awful" saying "you could just hear the contact with something, over and over". She said the noise was "solid" and "It was horrible".

WITNESS INMATE 4

- 19) Witness Inmate 4 advised Detective Deering that Victim 1 and Taylor Sanchez were in the cell across from her, which would be cell 410. Witness Inmate 4 noted cell 40 had the privacy window up so she couldn't see anything. Witness Inmate 4 said it happened right before the 5:45 count as she looked at her tablet at 5:41 and heard banging. She tried to ask hello you guys ok? Once Sgt. Matthew Maugham came she saw Taylor pacing back and forth. She saw this out her window. She demonstrated the banging by banging the table 3 times and said she heard moaning but couldn't tell if it was a male or female voice.

TCI SURVEILLANCE

- 20) Det. Deering further reports on 7/21/23, he reviewed the video of the hallway outside the cell of Victim 1 and Taylor. Det. Deering notes the following from the video:

At 4:38:01 p.m., Victim 1 enters into cell 410 and closes the door behind her. This is the last she was seen alive. Victim 1 does not leave the cell again until she is removed by the Medical Examiner.

At 4:38:27 p.m., Taylor enters into cell 410 and closes the door behind her.

At 4:54:22 p.m. Sgt Maugham uses a key to open cell 410. Taylor walks out and goes toward the interior of the building to a desk. Sgt Maugham gives her a bag of items and Taylor appears to sign something.

At 4:55:01 p.m. Taylor walks back into cell 410 with the bag with Sgt Maugham following her and Taylor closes the door once Taylor is inside.

At 4:58:30 p.m. a female CO delivers what appears to be a letter into cell 410 by sliding it under the door but it only goes about halfway under the door.

At 5:16:12 p.m. the letter disappears the rest of the way (as in someone inside 410 pulled it inside).

At 5:46:10 p.m. Sgt Maugham and CO Swiercz arrive at cell 410. Sgt Maugham looks into the window of 410 and immediately gets on his radio.

- 21) Det. Deering can say that by watching the camera footage in its entirety from 4:38:01 p.m. when Victim 1 enters cell 410, to 5:46:10 p.m. when Sgt Maugham arrived to cell 410 and discovered Victim 1 down, no one else enters into cell 410 other than Taylor. Det. Deering was inside of cell 410 and there were no trap doors or any other way for someone to ingress or egress the cell other than the door leading into the hallway that had constant video surveillance on it.

TCI BODY CAMERA

- 22) Det. Deering reviewed the body camera footage of Sgt. Maugham. Det. Deering notes that after guards are alerted to the incident between Taylor Sanchez and Victim 1 that Taylor Sanchez is placed in a cage. Sgt. Maugham then speaks to Taylor Sanchez. Sgt. Maugham asks Taylor Sanchez "What did you use?" Sanchez replied "I hit her with my hands and my feet." Sgt Maugham asks "nothing else?" Sanchez replied "nothing else". Sgt. Maugham replied "why what happened?" Detective Deering noted that the response from Sanchez is difficult to understand because of radio traffic but it sounds like "I was hearing voices telling me to kill her". Sgt. Maugham asked "why didn't you reach out to anyone before hand?". Sanchez replied what sounded like "I had told my PSU" which he believe means Psychiatric Unit. Sgt. Maugham asked "what did they say?" and Sanchez said something softly that cannot be heard. Sgt. Maugham asked so you didn't use any weapons? Sanchez laughed and said you know I didn't use any weapons.

STATEMENTS FROM THE DEFENDANT

- 23) Det. Mikulec reviewed reports of the TCI employees that were involved in the incident on July 19, 2023. Det. Mikulec notes the report of Correctional Officer Kelly Merkes. Later in the evening, Merkes is watching Sanchez. Taylor Sanchez asks of Merkes, "How is my cellie? Is she dead"? Merkes says, "I just got here. I don't know anything." Merkes says that during the conversation Sanchez is laughing and giggling. Sanchez then asks Merkes, "Why do you look like you're going to cry. You always look so cheery. I never saw you look like this. You're going to cry, aren't you?" Merkes replied that she was just tired. Sanchez replied, "I killed her, she is dead ya know. Why are you so nice to me, I just killed someone." Sanchez started laughing again. Again, Merkes says she just got here (to the area watching Sanchez). Sanchez responds once more, "Well, when you find out what I did you're going to hate me." Merkes didn't respond. Sanchez ends the conversation saying, "Don't be mad at me, ok. I don't want you to hate me."
- 24) Det. Mikulec further reports on July 28, 2023 he was provided a note that was located in the cell of Victim 1 and Taylor by Lt. Ralls. Ralls told Det. Mikulec that while cleaning paperwork belonging to Sanchez, based on identifiers, this letter was mixed in with other papers. It should be known that the letter was written with green ink. Det. Mikulec seized two notebook journals with Sanchez's name on them. Sanchez journaled. Sanchez journaled with several colors of ink pen, including green ink.

- 25) The letter says (and it should be known that some words are hard to read. Det. Mikulec is writing what he believe the words say, one can read the letter itself).

"I'm not sure what is going on but I'm sure that I fucking hate it. And you and everyone. People suck and I want to kill them all. But if I can't I won't and I (can't make out last word). So fuck all of you. Everyone is making fun of me and I need to hurt someone! But I don't want to go to seg. And ruin everything I've worked for".

- 26) Det. Mikulec further reports that he reviewed prison phone calls made by Taylor Sanchez. On 7/27/23, Taylor calls her mom. This is a summary of what Det. Mikulec heard in that call:

At 1:15 into the call Sanchez's mom asked Taylor, "Did they move you"? Taylor responds, "They did". Taylor's mom asks why.

At 1:30 Taylor asks her mom, "Are you by anybody right now"? Mom states, "I'm by myself in the car right now".

At 1:43 Taylor says, "Um, I don't know really how to tell you this but, I'm facing homicide charges". Mom exclaims, "What"? Taylor says, "Yeah" and mom asks "Why"?

At 1:55 Taylor says, "I beat up somebody and they died".

Mom shouts, "Are you fucking kidding me"? Taylor says, "No".

- 27) Mom immediately breaks down and is sobbing and crying. Taylor states, "Why are you crying, you don't even care about me." Taylor again says her mom doesn't love her and the mom says that of course she loves Taylor and that is why she is crying.

- 28) At 3:55 mom asks Taylor, "What happened, why did you beat somebody up"? Taylor says, "Um, I don't know". She adds, "I stopped taking my meds and I started hearing voices again." Taylor adds, "I thought she was using my toothbrush to scrub the toilet" and says, "I thought she was using my stuff to wipe the floor with and I thought she was messing with me." Sanchez's mom responded is, "Oh, God!"

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

Subscribed and sworn to before me on 01/23/24

Electronically Signed By:

Kristin R. Menzl

Assistant District Attorney

State Bar #: 1088841

Electronically Signed By:

Christopher Deering

Complainant