

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

WARREN E. SCHABOW, dob xx-xx-92

Case No.

21-M- 668

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of between 09/01/20 and 03/01/21 in the county of Brown in the Eastern District of Wisconsin, the defendant(s) violated:

Code Section

21 U.S.C. Sections 841(a)(1) and (b)(1)(A) and 846

Offense Description

Count One- knowingly and intentionally conspired with others to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

N/A M. Haines #688

Complainant's signature

Investigator Michael Haines

Printed name and title

Sworn to before me and signed in my presence.

Date:

MAY 7, 2021

J. Sicket Judge's signature

City and state:

Green Bay, Wisconsin

Honorable James R. Sicket

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT & ARREST WARRANT**

Narcotics Investigator Michael Haines, being first duly sworn, states that:

**Background**

1. I have been a sworn law enforcement officer with Ashwaubenon Public Safety since 1996 and have been assigned to the Brown County Drug Task Force as a Narcotics Investigator since 2019.

2. I have received formal training in drug trafficking investigations, including specialized narcotics investigations training with the Wisconsin Department of Justice. I am familiar with the street names of various drugs as well as the methods commonly used by drug dealers to package, ship, and prepare controlled substance for sale.

3. In addition, my duties include the investigation of drug trafficking organizations (DTOs) and violations of federal narcotics laws including, but not limited to, offenses defined by 21 U.S.C. §§ 841 and 846. I have received specialized training in the means and methods by which individuals and DTOs conduct their illegal drug trafficking activities, as well as in the use of various investigative techniques used to uncover unlawful drug trafficking.

**Basis for Information in Affidavit**

4. The information contained in this affidavit is based upon my personal knowledge and investigation, and information supplied to me by other law enforcement officers, all of whom I believe to be truthful and reliable. Based on my investigation and the information supplied to me by other law enforcement personnel, I have probable cause to believe the following regarding **BRITTANY J. VLACH (DOB: XX/XX/1990), NICHOLAS C. LEITERMAN (DOB:**

**XX/XX/1975), WARREN E. SCHABOW (DOB: XX/XX/1992); RILEY T. SCHLEIS (DOB: XX/XX/1993), and CASEY L. STEINHAGEN (DOB: XX/XX/1997).**

**Facts Establishing Probable Cause**

**A. Summary of Investigation**

5. After the arrests of VLACH, SCHABOW, and LEITERMAN, as discussed in more detail below, narcotics investigators learned, through comprehensive analyses of cellphones and interviews with suspects and witnesses, that VLACH, LEITERMAN, SCHABOW, SCHLEIS, and STEINHAGEN conspired together to distribute a large amount of methamphetamine in the Green Bay, Wisconsin area. Specifically, investigators determined that VLACH would commonly travel to Minneapolis, Minnesota to purchase methamphetamine. A review of cellphone records revealed that from September through December of 2020, VLACH made 16 trips to Minneapolis for the purpose of purchasing methamphetamine with the intention of distributing the substance in the Eastern District of Wisconsin.

6. During the period of this conspiracy, VLACH, LEITERMAN, SCHABOW, SCHLEIS, and STEINHAGEN resided in the Eastern District of Wisconsin.

7. Investigators also identified numerous drug customers to whom VLACH, LEITERMAN, SCHABOW, SCHLEIS, and STEINHAGEN would distribute drugs. Nearly all of the identified drug customers also resided in the Eastern District of Wisconsin.

8. According to the analyses of cellphone records, investigators determined that VLACH would purchase up to a pound of methamphetamine (approximately 453 grams) at a time. When VLACH would return to Green Bay, Wisconsin, she would distribute the methamphetamine to several drug customers. VLACH also utilized LEITERMAN, SCHABOW, SCHLEIS, and

STEINHAGEN to distribute the methamphetamine. After VLACH was taken into custody, she made several recorded jail calls to both LEITERMAN and SCHLEIS, in which she encouraged and instructed them to travel to Minneapolis to obtain methamphetamine from her source of supply.

**B. Arrest of SCHABOW – November 13, 2020**

9. On November 13, 2020, officers with Ashwaubenon Public Safety located approximately 46 grams of suspected methamphetamine in a vehicle after a traffic stop. SCHABOW was an occupant of the vehicle. A witness indicated that the methamphetamine belonged to SCHABOW. This traffic stop occurred in the Eastern District of Wisconsin.

10. After SCHABOW's arrest, investigators examined his cellphone and determined that SCHABOW's source of supply was VLACH and that he was purchasing several ounces of methamphetamine from her.

**C. Overdoses of VLACH and SCHLEIS – December 12, 2020**

11. On December 12, 2020, VLACH and SCHLEIS suffered apparent drug overdoses. They survived the overdoses due to the administration of Naloxone (Narcan) by law enforcement. During the investigation into their overdoses, law enforcement located a total of approximately 84 grams of suspected methamphetamine on SCHLEIS' person and in a vehicle rented by VLACH. The methamphetamine was located in the Eastern District of Wisconsin.

12. VLACH was arrested and taken to the Brown County Jail. Investigators listened to several of her recorded jail calls in which she instructed and encouraged LEITERMAN and SCHLEIS to purchase methamphetamine from her source of supply in Minneapolis. In one recorded call, SCHLEIS told VLACH that he obtained a half ounce (approximately 14.17 grams)



of methamphetamine from VLACH's source of supply in Minneapolis in exchange for \$700.

**D. Arrest of LEITERMAN – January 12, 2021**

13. On January 12, 2021, narcotics investigators with the Brown County Drug Task Force located approximately 62 grams of suspected methamphetamine in LEITERMAN's vehicle after a traffic stop, which occurred in the Eastern District of Wisconsin.

14. After LEITERMAN was arrested, he made a recorded jail call to ADULT MALE 1 and instructed him to remove LEITERMAN's safes from his house.

15. On January 14, 2021, investigators executed a search warrant at ADULT MALE 1's residence and located approximately 96 grams of suspected methamphetamine and \$22,285 cash. The suspected methamphetamine tested positive for the presence of methamphetamine.

16. ADULT MALE 1 was subsequently interviewed and admitted that he went to LEITERMAN's residence, as instructed in the recorded jail call, and retrieved his safes. ADULT MALE 1 stated that according to LEITERMAN, the safes contained methamphetamine and over \$20,000 in cash. ADULT MALE 1 further admitted that he purchased methamphetamine from LEITERMAN approximately 75-100 times in the past in the amounts of 0.5 or 1.0 grams. ADULT MALE 1 was aware that VLACH would obtain the methamphetamine from Minneapolis. ADULT MALE 1 resided in the Eastern District of Wisconsin.

**E. Phone Analyses**

***i. SCHABOW's Phone – Communications with VLACH***

17. After Schabow was arrested on November 13, 2020, law enforcement officers seized his phone and performed a forensic analysis pursuant to a search warrant. Investigators located a conversation with an individual named "Britt," who investigators determined to be

VLACH. The phone number associated with “Britt” matched the number of a phone later seized from VLACH.

18. Investigators located the following conversation between SCHABOW and VLACH, which occurred on November 12, 2020:

SCHABOW: Hey can I come grab that zip. I’m out.  
VLACH: I owe you another hz  
SCHABOW: No problem  
VLACH: Or no  
SCHABOW: No a zip because I only took a zip last night. Remember I bought 2 from you  
VLACH: U gave me enough for zip and a half. Oh yeah I remember. Ok.  
SCHABOW: Hey if you need help with more money britt let me buy another one right away  
VLACH: Another zip? For how much?  
SCHABOW: Yea I was hoping like 6 because it moves faster for both of us you know, but that’s up to you  
VLACH: I need to sell it for 650  
SCHABOW: Alright I got you.

19. I am aware, based upon my training and experience, that the term “zip” is a common word used to describe an ounce (approximately 28 grams). Investigators believe that VLACH and SCHABOW were discussing SCHABOW purchasing zips (ounces) of methamphetamine from VLACH. The day after this conversation, SCHABOW was found in possession of approximately 46 grams (1.62 ounces) of methamphetamine during a traffic stop. I am also aware, based upon my training and experience, that this amount of methamphetamine is consistent with distribution.

20. Investigators also located other text messages in which SCHABOW is offering to sell controlled substances. In one message sent on November 13, 2020, SCHABOW sent a text message to an individual which stated, “Bro I’m trying to get this half oz off for \$400.”

Investigators believe that SCHABOW was offering to sell a half ounce (14 grams) of methamphetamine in exchange for \$400.

*ii. VLACH's Phone – Communications with LEITERMAN*

21. After VLACH was arrested on December 12, 2020, investigators seized her phone and performed a forensic analysis pursuant to a search warrant. Investigators located several conversations between VLACH and LEITERMAN. LEITERMAN was listed as “Nikk” in VLACH’s phone, and the phone number associated with “Nikk” matched LEITERMAN’s known phone number, according to law enforcement databases.

22. VLACH and LEITERMAN commonly discussed purchasing and distributing controlled substances between September 25, 2020 through December 12, 2020.

23. In a text message conversation between VLACH and LEITERMAN on September 26, 2020, VLACH stated, “I’m here weighing it out. Just so u kno I’m keeping 3 zips. I fronted a zip, bought one with my 500, n then ur giving me a zip for getting it.”

24. On September 29, 2020, VLACH and LEITERMAN exchanged the following messages:

VLACH:	Well ur apart of that part of my business nick, we have discussed this and I asked u to ride with once, that doesn't mean ur my partner in making runs.
LEITERMAN:	I know that and I realize what I did wrong that's why I got emotional I even got, you think I'm remotely gonna do that again? Brittany all I'm asking for is one more chance I know what to expect I don't want your system I'm not going to ruin it if I ruin it then I ruined my future this is my life my income.

25. On October 3, 2020, VLACH and LEITERMAN exchanged the following messages:

VLACH: Yo u wanna sell a zip and a half for 1250 with me? Like  
pitch in 6bs each?  
LEITERMAN: Yeah when

26. On November 11, 2020, VLACH sent a text message to LEITERMAN which stated, "I'm not fronting the pound. I owed 1625 yet from a hp I front extra but I'm give half of it back so I don't owe any money. So u will just have ur hp." Investigators believe that VLACH is informing LEITERMAN that she will not front (provide on consignment) a pound of methamphetamine to LEITERMAN, but VLACH assured LEITERMAN that he would receive a half pound ("hp"). Investigators are aware that "hp" is a common abbreviation for "half pound."

27. On December 11, 2020, VLACH sent a text message to LEITERMAN which stated, "Ok so how would u feel about me just coming home and giving you all of the pound and then im gonna drive back to the city and hangout for the weekend and u can send me the money for the drugs."

28. Investigators located numerous other text messages between VLACH and LEITERMAN which were consistent with discussions of purchasing and distributing large amounts of controlled substances.

### *iii. VLACH's Phone – Communications with SCHLEIS*

29. Investigators located drug-related conversations between VLACH and SCHLEIS. Investigators determined that VLACH was communicating with SCHLEIS because the contact name was "Riley" and the phone number associated to "Riley" matched SCHLEIS' known phone number, according to law enforcement databases.

30. On December 8, 2020, VLACH and SCHLEIS had the following text message exchange:



VLACH: U make any loot  
SCHLEIS: Yea. Alex just tried calling me. I got 250-300 for you.

31. I am aware that “loot” is a common slang term for money. Investigators believe, based upon their training, experience, and knowledge of the investigation, that VLACH is asking SCHLEIS if he made any profits from selling methamphetamine.

*iv. VLACH’s Phone – Communications with ADULT MALE 2*

32. On December 4, 2020, VLACH exchanged text messages with ADULT MALE 2. In the messages, VLACH identified “Nick” as her “partner.” This was mentioned during a conversation VLACH had with ADULT MALE 2 about purchasing \$9,000 worth of methamphetamine.

*v. VLACH’s Phone – Communications with STEINHAGEN*

33. Investigators located a conversation between VLACH and STEINHAGEN in a messaging application called “Signal.” On November 26, 2020, STEINHAGEN informed VLACH, “I needa find a zip” and stated, “I got this half sold all in bs for 600.” STEINHAGEN added, “Imma just throw you as much money as I can.” Investigators believe, based upon their training, experience, and knowledge of the investigation, that STEINHAGEN was informing VLACH that he sold a half ounce of methamphetamine and was requesting a full ounce.

34. On November 30, 2020, STEINHAGEN sent a message to VLACH which stated, “I need 2 balls.” Investigators are aware that “ball” is a common term for approximately 3.5 grams. STEINHAGEN also stated, “I’m a RUNNER I do these sales for you to get paid.” Investigators are aware that the term “runner” is commonly used to describe an individual who distributes controlled substances on someone else’s behalf.

#### **F. VLACH's Jail Calls**

35. Investigators listened to several recorded jail calls made by VLACH. In January of 2021, VLACH made recorded phone calls to both LETIERMAN and SCHLEIS and informed both parties that they could purchase methamphetamine from her source in Minneapolis. In one conversation, SCHLEIS confirmed that he obtained a half ounce of methamphetamine from VLACH's source in Minneapolis in exchange for \$700.

36. On January 23, 2021, VLACH made a recorded phone call to her mother and informed her that she may get indicted on a conspiracy case and predicted that SCHABOW would be added as a co-conspirator.

37. On February 19, 2021, VLACH made a recorded phone call to her mother and told her that LEITERMAN was the "biggest drug dealer in Green Bay."

#### **G. Interview of SCHLEIS**

38. On May 5, 2021, SCHLEIS was interviewed at the Green Bay Police Department. SCHLEIS admitted that he previously purchased methamphetamine from VLACH. SCHLEIS was aware that VLACH would obtain the methamphetamine from a source of supply in Minneapolis. SCHLEIS was also aware that after VLACH was arrested, she would send LEITERMAN to Minneapolis to purchase methamphetamine. SCHLEIS admitted that he would also travel to Minneapolis to purchase methamphetamine from VLACH's source of supply. SCHLEIS stated that he would usually purchase two ounces (approximately 56 grams).

39. SCHLEIS indicated that he met VLACH in October or November of 2020 and that he would "middle" deals for her. SCHLEIS stated that he would commonly get 1-2 balls from VLACH between 1 and 4 times per week.

**CONCLUSION**

40. Based upon the foregoing information, I know there is probable to believe that **WARREN E. SCHABOW** conspired with others to distribute and possess with intent to distribute a mixture and substance containing in excess of 500 grams of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

41. Because this affidavit is offered for the limited purpose of supporting the criminal complaint and arrest warrant for **WARREN E. SCHABOW**, I have not set forth every fact known to me regarding this incident. Rather, I have included only those facts which I believe establish probable cause.

*N/A M. Haines #688*

Investigator Michael Haines  
Brown County Drug Task Force

Sworn and attested to me by reliable electronic means pursuant to the requirements of Fed. R. Crim P. 4.1 (Telephone) this \_\_\_\_\_ day of May, 2021.

  
\_\_\_\_\_  
JAMES R. SICKEL  
United States Magistrate Judge

