

IN THE DISTRICT COURT OF LANCASTER COUNTY NEBRASKA

CE24-1

STATE OF NEBRASKA )  
 ) SS  
COUNTY OF LANCASTER )

RETURN AND INVENTORY

Investigator Pedram Nabegh, of the Nebraska State Patrol, being first duly sworn, deposes and says that, on April 22, 2024, the Nebraska State Patrol served the within Search Warrant to Nicole R. Carter, her vehicle, and her residence, and collected the following property as evidence:

- iPhone with green case
- HP laptop with charger
- Handwritten note
- NDCS notebook
- Samsung Note and case
- Planner
- iPhone with red case
- iPhone with blue case
- Samsung phone with purple case
- 32GB USB drive
- Black and white Journal
- Dell laptop and charger in green bag

LANCASTER COUNTY  
2024 APR 24 PM 3:14  
CLERK OF THE  
DISTRICT COURT

DATED this 23<sup>rd</sup> day of April, 2024.

*Pedram Nabegh*  
Pedram Nabegh, Investigator  
Nebraska State Patrol

SUBSCRIBED AND SWORN TO before me this 23 day of April, 2024.



*Ashleigh Broughton*  
NOTARY



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IN THE DISTRICT COURT OF LANCASTER COUNTY NEBRASKA

STATE OF NEBRASKA )  
 ) SS  
COUNTY OF LANCASTER )

SEARCH WARRANT

CLERK OF THE  
DISTRICT COURT

2024 APR 24 PM 3:15

LANCASTER COUNTY

TO NEBRASKA STATE PATROL OFFICER: Investigator Pedram Nabegh

This matter came on for hearing on the 22<sup>nd</sup> day of April, 2024, upon the sworn application and affidavit for issuance of a search warrant of Investigator Pedram Nabegh of the Nebraska State Patrol, and the Court, being fully advised in the premises finds as follows:

That the Court has jurisdiction of this matter pursuant to the sections 29-712 through 29-828, Nebraska Revised Statutes, 1943, as amended.

That based upon the sworn affidavit and application for issuance of a search warrant of Investigator Pedram Nabegh of the Nebraska State Patrol, dated the 22<sup>nd</sup> day of April, 2024, that there is probable cause to believe that concealed on the premises at:

- 4622 Van Dorn Street, Lincoln, Lancaster County, NE (Legal Description: PRAIRIE VALLEY, BLOCK 5, Lot 8), and/or
- White 2019 Jeep Wrangler Unlimited SUV, NE plated YWJ913, VIN: 1C4HJXDG2KW619425, and/or
- The person of Nicole R. Carter (AKA Honea), who resides or is in control of the afore described premises,

The following property, to-wit:

- mobile telecommunication devices,
- computers,
- written notes,
- journals.

And, if found, to seize and deal with the same as provided by law, and to make return of this warrant to me within ten days after the date hereof.

YOU ARE, THEREFORE, ORDERED, with the necessary and proper assistance, to search the afore described location and/or person, for the purpose of seizing the before described property, and if found, to seize and deal with the same as provided by law, and to make return of this warrant to me within ten days after the date thereof.

IT IS FURTHER ORDERED, that execution of the Search Warrant be forthwith during DAY TIME HOURS.

IT IS FURTHER ORDERED, that Investigator Pedram Nabegh of the Nebraska State Patrol, make return of this Search Warrant to me within ten days after the date hereof.

GIVEN under my hand this 22nd day of April, 2024.

Ryan Post  
JUDGE OF THE DISTRICT COURT

IN THE DISTRICT COURT OF LANCASTER COUNTY NEBRASKA

STATE OF NEBRASKA )  
 ) SS  
COUNTY OF LANCASTER )

AFFIDAVIT AND APPLICATION  
FOR ISSUANCE OF A  
SEARCH WARRANT

CASE NO. NSP23011324

CLERK OF THE  
DISTRICT COURT

LANCASTER COUNTY  
2024 APR 24 PM 3:15

The complaint and affidavit of Investigator Pedram Nabegh, of the Nebraska State Patrol, on this 22<sup>nd</sup> day of April, 2024, who being first duly sworn, upon oath says:

Your Affiant is an investigator with the Nebraska State Patrol, assigned to the Criminal Investigations Division of the Headquarters Troop. Your Affiant has been a certified law enforcement officer with the Nebraska State Patrol Since January 6, 2006, and has been a criminal investigator since December 2016. During the course of his duty, Your Affiant has conducted numerous investigations of criminal violations of the law, including sexual abuse of an inmate or parolee.

That he has just and reasonable grounds to believe, and does believe, that there is concealed or kept hereinafter described, the following property, to-wit:

- Mobile telecommunication devices,
- Computers,
- Written notes,
- Journals,

That said property is concealed or kept in, on, or about the following described place or person, to-wit:

- Nicole R. Carter's person
- Work areas under the control of Nicole R. Honca at the Lancaster County District Court
- Vehicle: White 2019 Jeep Wrangler Unlimited SUV, NE plated YWJ913, VIN: 1C4HJXDG2KW619425
- Residence: 4622 Van Dorn Street, Lincoln, Lancaster County, NE (Legal Description: PRAIRIE VALLEY, BLOCK 5, Lot 8)

That said property is under the control or custody of Nicole R. Carter.

That the following are the grounds for issuance of a search warrant for said property and the reasons for his belief, to-wit:

On April 11, 2023, Your Affiant was assigned to investigate the report of a sexual assault alleged to have occurred at the Nebraska State Penitentiary. An inmate, identified in this Affidavit with his initial, KTM, alleged he was involved in an unwanted and unsolicited relationship with Caseworker Abbey L. Fielder of Nebraska Department of Correctional Services (NDCS), which included sexual contact between him and Fielder. During his investigation of Fielder, Your Affiant located evidence that gave him probable cause to believe Caseworker Laura L. Schluckebier (DOB 11-21-1978) and former NDCS employee, Nicole R. Carter (AKA Nicole R. Honea) (DOB 10-04-1976) had also committed similar violations of the law in Lincoln, Lancaster County, Nebraska.

Not every fact discovered during Your Affiant's investigation was detailed in this Affidavit. This Affidavit details some of the facts known to Your Affiant that establish probable cause in support of the arrest of Abbey L. Fielder, Laura L. Schluckebier, and Nicole R. Carter.

Your Affiant interviewed KTM at the Nebraska State Penitentiary. KTM alleged that Fielder approached him for a relationship, and that her contacts with him escalated from touching and rubbing his back, to kissing him in the mouth, to touching his genitals (over his pants). KTM alleged that these contacts occurred in the housing unit where he was assigned as the Laundry Porter, and in portions of the housing unit that were not within line-of-sight of anyone else, such as a laundry room and a chemical/supply closet. KTM alleged that the unwanted contacts from Fielder began on or about the end of January/beginning of February 2023, and escalated to her touching his genitals in April of 2023. KTM told Your Affiant at first, he thought his interactions with Fielder were "cool" because he was "making out with a guard" but over time he felt "awkward and weird" because although he didn't say "no" to Fielder, he "didn't feel like (he) could say no" because Fielder had authority over him. KTM alleged Fielder had also shown her bare buttocks to him, shown him nude photographs of herself (using her Apple Watch), and had shared food from her lunch box with him.

Your Affiant interviewed Fielder regarding KTM's allegations. Fielder denied having any personal relationship with KTM. Fielder denied ever kissing KTM, and she denied any sexual contact between her and KTM. Fielder denied sharing any of her food with KTM and denied showing him any nude photographs of herself.

Fielder gave Your Affiant consent to search the content of her mobile telephone. After copying the content of Fielder's mobile telephone, Your Affiant applied for and obtained a Search Warrant to search the content of Fielder's mobile telephone. After obtaining the Search Warrant, and with the help of the Nebraska Information Analysis Center (NIAC), Your Affiant conducted a search of the content of Fielder's mobile telephone and located the following evidence:

Evidence from conversations between Fielder and Schluckebier:

Your Affiant examined conversations between Fielder and Schluckebier. In August of 2022, Fielder told Schluckebier in text messages that she spoke to her supervisor, Unit Manager Joseph Conroy, about having feelings for an inmate, but she "...didn't tell Conroy any details or anything". She said her supervisor told her that their conversations would remain "off the record". During the same exchange, Fielder wrote, "I need a break I'm on day 6 of 14". Schluckebier replied, "Yes don't do too much. The money is nice but be careful" and "I guess when you have a boyfriend it's fun lol". Fielder replied, "Exaaaaactly lol I miss him." and "I think I'm going to have Conroy move him." Your Affiant believes Fielder and Schluckebier were referring to Inmate BLM (referred to by his initials in this Affidavit) as Fielder's "boyfriend" whom she had a romantic relationship with, which she had since ended.

When Schluckebier asked Fielder what reason she would give Conroy for wanting to move BLM out of the housing unit, Fielder replied she would tell Conroy, "That I have feelings for him and it's hard to have him around". Schluckebier lists several other inmates that can potentially replace BLM. During that conversation Fielder wrote, "...I have men break my heart outside of prison I don't need men in prison doing it too". Schluckebier replied, "Just learn from it and move on". Fielder replied, "Yeah that's what Jones (Inmate Anthony Jones) said too."

On August 29 and 30, 2022, Fielder and Schluckebier wrote about rumors Fielder heard about herself and BLM; she assumed BLM has started the rumors. She had heard rumors that she had given BLM oral sex and BLM had digitally penetrated her in the housing unit supply closet.

On September 3, 2022, Fielder wrote, "...he (BLM) was telling people shit while we were still talking before I cut him off". Schluckebier replied, "So glad he has nothing on you! Nothing traceable." Fielder replied, "I know thank god. I was highly considering the tattoo thing".

Based on Fielder and Schluckebier's conversations, Your Affiant does not believe that Fielder and BLM had oral sex or sexual digital penetration. However, Your Affiant observed a pattern of behavior, that Fielder had romantic feelings for Inmate BLM, and that Inmate BLM and Fielder at minimum exchanged pleasantries that would classify BLM as Fielder's "boyfriend" (as described by Fielder to Schluckebier), and Fielder was thankful that BLM did not have any "traceable" incriminating evidence against her.

On November 2, 2022, Fielder wrote to Schluckebier, "Idk I think I do like (Inmate TS) idk what to do". Schluckebier replied, "Oh snap!!!" Fielder wrote, "Conroys going to kill me lol". On November 12, 2022, Fielder wrote to Schluckebier, "Did you make out with one yet??" Fielder replied, "No and hopefully I never do." On November 26, 2022, Schluckebier wrote, "I 'broke up' with smith yesterday" and "I'm scared he's gonna switch up and like tell on me or something lol" and "Idk I was just too emotionally involved and I'm paranoid".

On November 26, 2022, Fielder wrote to Schluckebier, *"And you've only been invested in I of them"*. Schluckebier replied, *"Yeah but that was intense!! To say the least"*. Fielder wrote, *"Why can't I find one like (Inmate referred to by his initial, ATB, in this Affidavit)"*.

Between February 8, and February 10, 2023, Fielder wrote to Schluckebier that Inmate KTM had given him a note, and that she did not open the note until she got home. Fielder wrote to Schluckebier about still having feelings for Inmate BLM; she wrote, *"...I talked to (BLM) earlier and he was telling me how much he misses me and how beautiful I am and how he wants to move back to 8 how he's going to find me when he gets out and how he's always thinking about me and I got like super fucking emotional because I really do have feelings for him and I can't do anything about it and it doesn't matter because he has to another four years before he even has a chance of leaving...Then (Inmate referred to by his initials, NC) asked me if he could talk to me and he told me that someone from the A-side asked him if me and (KTM) were fucking and told me that I need to be careful with how much time I'm spending with him because it's a lot. And idk which one to pick. I want (BLM) but idk if I can trust him to be careful or if I should tell both of them to go away."*

On February 13, 2023, Fielder asked Schluckebier, *"How long were you and (ATB) a thing before it got bad"*. Schluckebier replied, *"Like 3 months"*, and *"As long as you don't bring them anything or communicate with them you're ok."* This gave Your Affiant probable cause to believe Schluckebier had a romantic relationship with Inmate ATB that lasted approximately three months.

On February 17, 2023, Fielder wrote to Schluckebier she was going to work overtime in Housing Unit 7. Schluckebier asked her, *"Wait is your boyfriend in there..."* and Fielder replied, *"Yes"*. On February 20 and 21, 2023, Schluckebier asked Fielder, *"How was your date today?? lol"*. Fielder wrote, *"Call me before work lol there's no good end to (the) drama and my 3 boyfriends"*.

During text messages on February 21, 2023, Fielder expressed being afraid of getting arrested, being afraid of a camera having been in place (in the supply closet, based on the context of the conversation), and Inmates being angry with her. She mentioned inmates and staff filing reports about her spending too much time with Inmate KTM. Fielder wrote, *"I don't need this I just want them to go away so I can flirt in peace with (KTM)"*. Schluckebier replied, *"Conroy is trying to help you out. There is no camera (but) you have to lay low....for a minute till it blows over"*.

On February 23, 2023, Fielder wrote to Schluckebier, *"So I showed him (Inmate KTM) some spicy pics and then I'm talking with (NC) and he's asking me what I look like on the streets and I went up show him and he saw my titties instead"*. This text message gave Your Affiant

probable cause to believe Fielder had shown Inmate KTM a photograph depicting her bare chest (on purpose) and had unintentionally shown the same photograph to Inmate NC.

On March 3, 2023, Fielder wrote to Schluckebier, *"He is a good kisser btw"* and approximately one hour later, she sent a photograph of a handwritten note, indicating the writer's affection for Fielder. The photograph of the note was associated with a text message to Schluckebier which read, *"Like how cute but do I believe him"*.

On March 8 and 9, 2023, text messages from Fielder to Schluckebier indicate that an Inmate on the "B" side of the housing unit had asked Fielder to bring contraband into the prison, and she had reported him to her supervisor. Fielder then wrote to Schluckebier, *"That's like the only reason that I wrote the report to cover my ass then they won't think that I'm doing anything lol"*.

On the evening of March 9, 2023, Fielder wrote to Schluckebier, *"I can't Schluck. Why is he so cute"* along with an image of another handwritten note. In the handwritten note the writer expressed his affection for the recipient, and concluded with, *"I know a year is a long time but I got you if you got me."*

On March 11, 2023, Fielder wrote to Schluckebier, *"I had one of my hoes over and it just made me sad because it's not him and this isn't good idk if I can feel like this for a year lol"*. Schluckebier wrote, *"Now remember you were saying the same things about the other one."* Fielder replied, *"I know I know but (BLM) has too much time. This one's like possible idk I like him and I feel bad like I've been avoiding (NC) cause I don't wanna break his heart"* and *"(NC) keeps asking me to get to know him and I keep dodging the topic lol I don't wanna tell him about (KTM) so idk what to say"*.

On March 14, 2023, Fielder wrote to Schluckebier, *"Like this is so cute I can't"* and sent an image of a handwritten note. The note was dated March 14, 2023. The writer expressed affection for the recipient, and wrote, *"I want you now & I'm going to want you when I'm free."* The note expressed that the writer wanted to continue a romantic relationship with the recipient after they gained their freedom in one year. Just like the other two notes, this handwritten note listed several songs for the recipient to listen to. Based on the timeline of events and the context of Fielder's conversations, Your Affiant believes that the handwritten notes were from Inmate KTM to Fielder.

On March 21, 2023, Fielder wrote to Schluckebier, *"Do you really think that I can get away with this for a whole year or am I crazy?"*



On March 22, 2023, Fielder asked Schluckebier, "*Are you sure the lobby camera can't see in the closet all the way I'm always paranoid*". Schluckebier replied, "*Nope because I've seen them. But be super careful... someone could walk in super quiet... Not all the way in... A camera can't ture the corner. Lol*". Fielder replied, "*I'm not even doing anything that bad but I'm way too paranoid idk if I can be this paranoid for a year*". Schluckebier asked, "*Yep that's long... is he that great??*" Fielder replied, "*I mean I really like him stuff with him is different than it was with (Inmate BLM)*".

On March 23, 2023, Fielder sent an image to Schluckebier, and wrote, "*Why is he cute*". The image was of a handwritten note addressed to "*Abbey*"; the writer expressed their affection for "*Abbey*". Fielder wrote to Schluckebier, "*I need to see your notes from him lol*". Schluckebier replied, "*I don't know if I can look at them again... yet*". Fielder asked, "*If none of that ever happened do you think that you would still be talking to him right now*". Schluckebier replied, "*Actually absolutely lol*". Fielder wrote, "*And I feel bad because Conroy said if you're dirty I'll kill you but I don't see it that way*". Schluckebier replied, "*Why are you cheating on your boyfriend*". Fielder wrote, "*He doesn't want me fucking other people but he also said if I do he doesn't want to know lol*" and "*Well, I can't not have sex for a year lol id die*". Your Affiant believes that Schluckebier had a relationship with an inmate, that the relationship had ended, and that Schluckebier had retained the handwritten notes from that inmate.

On March 24, 2023, Fielder asked Schluckebier, "*Were you paranoid all the time*" and Schluckebier replied, "*Not really... Only when something was mailed in... I would sometimes when Conroy would come in and not be smiling. Lol... I've told you of they knew you would know. They have suspicion. So there going to watch you but they think your bringing shit in... Be smart... But I wasn't doing anything so I never was worried that much*". Fielder replied, "*You were still doing stuff just not bad stuff lol idk how you weren't paranoid*". Schluckebier replied, "*I wasn't doing anything... I plead the 5th... me no English... Did you erase the messages*". Fielder replied, "*The old ones yes lol*". Schluckebier wrote, "*I get paranoid about them taking your phone lol*".

#### Evidence from conversations between Fielder and Carter (AKA Honea):

Your Affiant examined conversations between Fielder and Carter (AKA Honea). Your Affiant learned through the context of those conversations that on or about February 17, February 19, 2023, Fielder and TMK kissed, and that this had occurred "*more than once*." Fielder told Carter that she had feelings for TMK. Fielder was also concerned that another inmate she had a relationship with might find out about her interactions with TMK. This and other statements made by Fielder to Carter indicated that Fielder had at least two romantic relationships with inmates. Fielder also told Carter that if rumors begin to circulate in the housing unit about her and TMK, she will send another inmate (whom she named in the message) "*after him (TMK)*".

On February 24, 2023, Fielder wrote to Carter that she showed “*some spicy pics*” to TMK. She explained to Carter that when another inmate asked her what she looked like outside of work, “*the first picture that came up was of my titties and so*” the other inmate had “*seen (her) titties.*”

Your Affiant learned that Carter was flirting with another inmate, who will be referred to by his initials, NRT, in this Affidavit. Based on text messages between Carter and Fielder, Carter sent messages to NRT through a third party, and held-off on initiating a romantic and sexual relationship with him until he was released on parole. Inmate NRT was on parole between January 31, 2023, and June 9, 2023. He was housed at Reception and Treatment Center in Lincoln after violating the term so his parole. While NRT was on parole (between January 31, and June 9, 2023), Carter met-up with him. Carter was still employed with NDCS at the time; her employment with NDCS began on July 5, 2022, and ended on April 22, 2023.

On February 16, 2023, at 2221 hours, Carter sent a message to Fielder, “*I’m with him right now*” along with a photograph of NRT. The photograph depicted NRT sitting inside a vehicle, smiling at the camera. At 2246 hours Fielder received a message from Carter’s phone, which read “*Got to spend an hour with him*”.

On February 24, 2023, Carter wrote to Fielder, “*We didn’t fuck yesterday but, almost. He’s not circumcised! I have ZERO experience with that!!*” and “*That’s exactly what I’m afraid of. That whole under the hood thing freaks me out hygiene wise. He told me. I didn’t look at it but definitely felt it lol. I feel like he’s a clean person so hopefully it’s not an issue*”. Your Affiant has probable cause to believe Carter was referring to Parolee, NRT.

Based on Carter’s conversations with Fielder, it became apparent to Your Affiant that Carter believed that a relationship with NRT was not illegal once he was no longer housed at the Nebraska State Penitentiary and was on parole. Before NRT was on parole, Carter conveyed to Fielder that she could not do anything with NRT until he was out of the facility (on parole).

Evidence from conversations between Fielder and other individuals:

No significant evidence of sexual abuse of an inmate was located within Fielder’s text messages with other contacts on her mobile telephone. Fielder told several people that she would get too close to some inmates, and that she had spent too much time with an inmate (whom Inv. Nabegh believed was TMK based on the context and timeline of the conversations). Fielder told some of her contacts that her getting close to inmates had occurred in the past, but that she had not done anything wrong. She did tell one contact that she found a particular inmate attractive, and had feelings for him, but did not identify the inmate; she also told that contact that she had not

acted on her feelings.

On April 17, 2022, Fielder shared two TikTok videos with contact saved as Mark Stephens. The video was of inmates in an unidentified Nebraska State Penitentiary housing unit, flashing US currency and dancing. Fielder's message read, "*Tik toks guys in my unit made.*"

Fielder's NICaMS audit:

Your Affiant requested NDCS to conduct an audit of Fielder's activity on their Nebraska Inmate Case Management System (NICaMS). The audit was for Fielder's actions between February 9, 2022, and April 10, 2024. Of the 1,025 inmates that Fielder acted on in the system, the average action per inmate was 23.5 times. Fielder took 920 actions on Inmate BLM's profile; this was 39.1 times more often than her average actions on other inmates, and the highest occurrence of actions by Fielder for an inmate.

Schluckebier's NICaMS audit:

Your Affiant requested NDCS to conduct an audit of Schluckebier's activity on their Nebraska Inmate Case Management System (NICaMS). The audit was for Schluckebier's actions between February 9, 2022, and April 10, 2024. Of the 1,288 inmates that Schluckebier acted on in the system, the average action per inmate was 11.1 times. Schluckebier took 712 actions on Inmate ATB's profile; this was 64.1 times more often than her average actions on other inmates, and the highest occurrence of actions by Schluckebier for an inmate.

Carter's NICaMS audit:

Your Affiant requested NDCS to conduct an audit of Carter's activity on their Nebraska Inmate Case Management System (NICaMS). The audit was for Carter's actions between July 2022, and April 2023. Of the 257 inmates that Carter acted on in the system, the average action per inmate was 4.6 times. Carter took 42 actions on Inmate Michael Lopez's profile; this was 9.1 times more often than her average actions on other inmates, and the highest occurrence of actions by Carter for an inmate. Inmate Lopez was not a subject of Your Affiant's investigation.

Probable Cause:

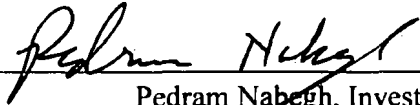
Based on his investigation, Your Affiant has probable cause to believe, and does believe, that Nicole R. Carter (AKA Nicole R. Honea) committed the following crimes in violation of Nebraska Revised State Statute: §28-322.03, Sexual Abuse of an Inmate or Parolee in the Second Degree, a Class IIIA Felony; §83-417, Allowing Committed Offender to Escape or Have

Unauthorized Visitation or Communication, a Class IV Felony; and that the crimes occurred at the Nebraska State Penitentiary, in Lincoln, Lancaster County, Nebraska.

Your Affiant has probable cause to believe, and does believe, that kept, stored, or concealed in Carter's mobile telephone, computer, or other electronic communication devices, is evidence of the above described crimes. Your Affiant has probable cause to believe, and does believe that kept, stored, or concealed in Carter's vehicles or residence is additional evidence of her communications and journals written by Carter, detailing her romantic relationships with Inmate NRT.

A warrant authorizing a DAY TIME search is requested.

WHEREFORE, Your Affiant prays that a Search Warrant may be issued according to law.

  
Pedram Nabegh, Investigator  
Nebraska State Patrol

SUBSCRIBED AND SWORN TO before me this 22nd day of April, 2024.

  
JUDGE OF THE DISTRICT COURT