

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

Special Agent (SA) Michael P. Sotka, after being duly sworn, deposes and states as follows:

1. I have been employed by the Federal Bureau of Investigation (FBI) since August 1999. I am currently assigned to the Coeur d'Alene, Idaho, Resident Agency of the FBI Salt Lake City Field Office, and assigned to the North Idaho Violent Crimes Task Force (NIVCTF). As part of my duties, I investigate violent crimes as they relate to any violation of Federal laws.

2. Prior to employment with the FBI, I was employed by the Euclid, Ohio, Police Department from December 1994 to August 1999. While employed by the Euclid Police Department, I was assigned to the patrol division.

3. This affidavit is being submitted in support of a criminal complaint against Edgar J. Steele for the Use of Interstate Commerce Facilities in the Commission of Murder for Hire, in violation of 18 U.S.C. § 1958. I believe probable cause exists to show that Steele committed a crime as set forth below.

4. On June 9, 2010, CW-1 met with Special Agent (SA) Mike Sotka and Task Force Officer (TFO) Dan O'Dell regarding a murder for hire plot. During this meet, CW-1 agreed to assist the FBI with investigating the murder for hire plot. CW-1 has no prior criminal convictions and has received \$500 in cash for travel expenses.

5. CW-1 advised that he/she has known Edgar Steele for approximately twenty years and has done several work projects for Edgar Steele. Approximately six months ago, while CW-1 was working for Edgar Steele, Edgar Steele brought up a conversation regarding a list of people that Edgar Steele wanted killed. On the list of people that Edgar Steele wanted killed were his wife [REDACTED] C.S., and [REDACTED] C.S.'s mother, believed to be [REDACTED] J.K. [REDACTED] J.K.

6. CW-1 agreed to conduct the killings and was provided with money as well as with [REDACTED] C.S.'s mother's address on a sheet of paper but has since burnt that sheet of paper. CW-1 has remembered the street name as something like [REDACTED]. Public records show the address as [REDACTED]. CW-1 has taken a trip to Oregon City, Oregon, at the direction of Edgar Steele, to scout out the location.

7. CW-1 was told by Edgar Steele that the murder had to look like an automobile accident so that Edgar Steele could collect money on an insurance policy. CW-1 would receive an additional \$25,000 after carrying out the murders. CW-1 advised that he/she was suppose to carry out the murders on Friday, June 11, 2010.

8. On June 9, 2010, CW-1 participated in a controlled consensually monitored meeting with Edgar Steele at Steele's residence located at [REDACTED]. Prior to CW-1 traveling to Steele's residence, CW-1 was provided with a body recording device. CW-1 drove to Steele's residence while under NIVCTF members surveillance. CW-1 went into a horse barn located on the property and met with Steele. While inside the barn, Steele began to discuss the murder plot that is suppose to happen on Friday, June 11, 2010. Steele discussed an insurance policy that would payout if the murder were to involve [REDACTED] C.S. [REDACTED]'s vehicle. Steele told CW-1 that he/she would receive an additional \$100,000 if the policy is paid out.

9. During this same meeting CW-1 asked for \$400 to help cover the travel cost to Oregon City, Oregon to carry out the murder. Edgar Steele left the barn and is believed to have gone into his residence to obtain the \$400. Edgar Steele also discussed the payment amounts if only one of the two targets is killed.

10. Before the meeting ended, Edgar Steele discussed the alibi that he has set up for Friday, June 11, 2010. Edgar Steele told CW-1 that if the Black Endeavor were to leave he guaranteed that his wife would be driving it. SA Sofka confirmed that a 2004 Mitsubishi Endeavor bearing Idaho License Plate [REDACTED] is owned by Edgar and [REDACTED] C.S. [REDACTED]. At the conclusion of the meeting, CW-1 drove to a predetermined location where the recording device and \$400 cash paid by Edgar Steele to CW-1 were recovered.

11. On June 10, 2010, CW-1 participated in a second controlled consensually monitored meeting with Edgar Steele at Steele's residence located at [REDACTED]. Prior to CW-1 traveling to Steele's residence, CW-1 was provided with a body recording device. CW-1 drove to Edgar Steele's residence while under NIVCTF members surveillance. During the meeting Edgar Steele advised he would call and confirm that [REDACTED] C.S. [REDACTED] would be leaving the residence on June 11, 2010 during the morning hours. Edgar Steele told CW-1 that he would receive payment when confirmation of deaths was received and Edgar Steele was not considered a suspect.

12. During this same meeting CW-1 and Edgar Steele discussed the travel plans to Oregon to carry out the murder. CW-1 and Edgar Steele discussed the car accident was the best way to do the murder and make sure that they were dead after the accident because Edgar Steele did not want to take care of a paraplegic.

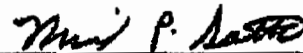
13. Edgar Steele once again discussed the alibi he has set up for Friday, June 11, 2010. Edgar Steele told CW-1 that if he/she got caught he would deny knowing CW-1. Edgar Steele also told CW-1 that if CW-1 got caught but did not talk about Edgar Steele, Edgar Steele would compensate his family.

14. Prior to the interview ending, Edgar Steele told CW-1 that he has no second thoughts and he wants the plan carried out. This statement was made multiple times during the

15. At the conclusion of the meeting, CW-1 drove to a predetermined location
where the recording device was recovered. A post search of CW-1 was conducted.

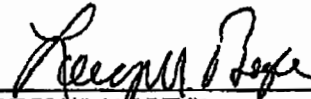
16. Based on my training, experience, and knowledge of this case, I believe that
there is probable cause to issue a complaint for the arrest of Edgar J. Steele. This belief is
supported by CW-1's contacts with Edgar Steele and consensually recorded conversations as well
the prior meetings between CW-1 and Edgar Steele discussing the murder of **C.S.** and
her mother which have taken place at this residence.

Affiant, being duly sworn, states that the facts contained in this affidavit are true
to the best of my knowledge and information.



Michael P. Sotka, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
this 11 day of June, 2010.



LARRY M. BOYLE
United States Magistrate Judge
District of Idaho