

AO 91 (rev.11/11) Criminal Complaint

AUTHORIZED AND APPROVED DATE: Brandon Hale 3/22/2023

AMG  
3/22/23

United States District Court

for the

WESTERN

DISTRICT OF

OKLAHOMA

United States of America

v.

STEVEN NEEL HARRY,

)  
)  
)  
)  
)

Case No: M-23-182-AMG

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 March 22, 2023, in the county of Oklahoma County, in the Western District of Oklahoma, the defendant(s) violated:

Code Section

18 U.S.C. § 2422(b)

Offense Description

Attempt to Entice or Coerce a Minor

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent, Marisol Flores, Federal Bureau of Investigation which is incorporated and made a part hereof by reference.

Continued on the attached sheet.



Complainant's signature

Marisol Flores  
Special Agent  
FBI

Sworn to before me and signed in my presence.

Date: 3/22/23

City and State: Oklahoma City, Oklahoma



AMANDA MAXFIELD GREEN, U.S. Magistrate Judge  
Printed name and title

**THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Marisol Flores, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) since May 2015, and I am currently assigned to the Oklahoma City Division. Since joining the FBI, I have been involved in investigations of child exploitation matters and computer crimes against children. I am currently assigned to investigate violations of federal law involving the exploitation of children. I have gained expertise in conducting such investigations through in-person trainings, classes, and everyday work in my current role as an SA with the FBI.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. As shown below, there is probable cause to believe that Steven Neel Harry ("Harry") violated 18 U.S.C. § 2422(b) (using a facility or means of interstate and foreign commerce, namely, a cell phone, cell phone data, a computer, the Wickr Me application, and the Internet, to knowingly attempt to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in sexual activity through an adult intermediary). I submit this Application and Affidavit in support of the Complaint.

4. Since this Affidavit is being submitted for the limited purpose of securing a complaint, I have not included each and every fact known to me concerning this investigation.

### **BACKGROUND OF THE INVESTIGATION**

5. In September 2022, a law enforcement officer acting in an undercover capacity (hereinafter the "UC-1") was posing as the foster parent of an 11 year-old girl on a geo-location based social-networking website located on the internet. The username and about section of the UC-1's profile used descriptive language that could be indicative of an individual interested in children for sexual purposes.

6. On or about September 27, 2022, UC-1 received a message on the geo-location based social-networking application that read, "I am curious as to what aspects of family role play most interest you."<sup>1</sup> The message was from a person with the username "bxdxsm," which subsequent investigation established is Steven Neel Harry.<sup>2</sup> Harry's geo-location was Oklahoma City, Oklahoma. UC-1 responded, "Hey there. Sorry slow to get back. Its sorta complicated but not so much in the RP of things. Foster mom here and was looking for some help maybe w/my little. Thanks for saying hey. Sorry if this isn't

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<sup>1</sup> A "geo-location" based social-networking site focuses on facilitating interactions between people who are physically located near each other so that the online interaction can develop into a real-world interaction more easily than on social-networking sites that facilitate interactions between people in potentially far-flung locations around the United States or the world.

<sup>2</sup> Open source and law enforcement database research on Steven Neel Harry's name and identifiers provided on the geo-located social networking application and within text communications with UC-1 identified an individual now known to law enforcement as Steven Neel Harry, whose DMV photograph visually matches photographs posted on the social networking application and photographs sent by Harry to the UC. Steven Neel Harry also arrived at the location where he had arranged to engage in sexual conduct with the UC's purported 11-year-old child.

your thing!” Harry replied, “I’m really not interested in rp either,” to which UC-1 responded, “Oh nice. Great to hear. It’s hard to find someone genuine and real here.” Harry replied, “I agree, most are more interested in their fantasy, rather than actually exploring their desire.” Harry then asked to communicate via the use of another encrypted social media messaging site and provided his username of “Nightrippz.” UC-1 replied providing their username for that application as “kykyturtle.” During messaging, Harry asks, “How old is the girl..” to which UC-1 replied, “exactly gets me/us outta here! Can we maybe tik on wickr? Prob little safer before I say her age. Is that ok? If ur not ok w little yngr maybe we don’t have to talk. Sorry.” Harry replied, “I would be happy to chat on [the social media messaging site.] Nightrippz.” Messaging then transitioned to the encrypted messenger site with usernames Nightrippz for Harry and kykyturtle for UC-1.

7. On or about October 6, 2022, UC-1 and Harry began exchanging extensive direct messaging utilizing the encrypted messaging application. Harry initiated messaging to UC-1 stating “Hello, this is Bxdxsm from [geolocated social media website.]” Harry asked for the child’s age to which the UC replied, “shell be 12 in Dec. Xmas kid I guess.” Harry replied that “12 is a good age for a girl to learn.”

8. During Harry’s conversations with UC-1, he stated, “What would you like for her to learn?” UC-1 replied, “I think id like it all but not sure about something inside? Id defer to a man lol im more into the XX chromosome types so I don’t really know to be honest. Lol.” In subsequent conversations, Harry expresses interest in sexual contact with the purported eleven-year-old child. Harry asked UC-1, “What are you thoughts on anal?” To which UC-1 replied “not really sure. havnt done it myself. so i cant really give an

opinion. do u think she could do it? id trust that u could try w her maybe and see if it is ok? is it painful?" Harry answered, "First, yes it would be painful, until she learned to accept it, she would have to be well lubricated." Harry went on to say, "I prefer submissive girls, so i would explore her obedience and submission with her [...] Yes, while nudity would be almost from the first time we met, as would touching her quite intimately [...] Though I also believe time should be taken so she enjoys what she is experiencing [...] I would explore both forced and denied orgasms with her."

9. While communicating with UC-1, Harry indicated the foster parent would need to start preparing the eleven-year-old child, including being taught masturbation. On October 6, 2022, Harry said, "There are things that you would have to teach her, I'm sure she has started growing pubic hair, which I would want her absolutely smooth, either shaved or waxed. [...] How about bondage, her wrist tied, legs tied so she was spread wide granting total access to her pussy and ass hole, both fully explored and at the very least penetration by a finger?" To which UC-1 said, "I would totally trust you with her. you seem wonderful. I would allow taht and she would probably enjoy it." Harry replied, "Personally I would want to play with her asshole, using my finger to being with then a small toy to help prepare her for using her."

10. On October 8, 2023, Harry asked UC-1 if UC-1 would be comfortable bringing the child to Harry for Harry to have sexual contact by asking UC-1, "Are you comfortable with bring her to me, wearing a collar, and on a leash. And explaining to her that it's alright for me to remove her clothes and touch her very intimately?" UC-1 replied, "oh yea." Harry went on to say, "I would spend time with her sitting in my lap, and holding

her, and would probably want to do that quite often [...] How far do you really want me to explore her sexuality with her? What limits and boundaries would you want for her?" UC-1 answered, "Honestly I trust you and you seem so great. I'd let you try anything as long as u explain to her what's like going to happen." Harry went on to say, "I am serious, in that I would want her to learn how to give pleasure to a woman, whether it was in my present, or in private between you and her, it's something I would want her to learn and become go at [...] You , know both vaginal and anal penetration will be painful for her, regardless of how gentle or how much lubrication I use. Though sometimes I will be a little bit rougher simply because I enjoy it, and she needs to accept it."

11. On October 15, 2022, Harry asked UC-1, "One more question, how do you think Kys<sup>3</sup> would react to having her wrist put in leather cuffs and blindfolded? [...] The reason I am curious about how Kys would react to being blindfolded and her wrist tied in leather cuffs. Is the first time I entertained her, I first wouldn't want her interference with what I was doing to her. As I have said, I would want to give her oral, starting at the bottoms of her feet, licking them, sucking each of her toes. Slowly working my way up each to her legs, intimately licking her tight little asshole while massaging her little clit. When she started to become wet. I would lub my finger and slide it in her asshole, as I begin licking her pussy and focusing mainly on hher clit. Since my primary interest are in seeing how many orgasms that she can have, I would switch to using a little vibrator focusing strictly on her clit. I want her to focus on what she is experiencing, yet unable to

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<sup>3</sup> Kys is the 11-year-old female foster child of UC-1.

stop or fight the experience.”

12. On October 22, 2022, Harry asks UC-1, “Will you eve give her a wine enema, and bring her to me knowing that sexually she will be used rougher that usual?” To which UC-1 said, “Oh ok. Got it. that makes sense. I would I may need to know how much to give her though. Like how much should go into the bag.” Harry replied, “I would start with a half pint of MD 20/20, it has a higher content of alcohol than most wine and then make her hold it as long as possible”.

13. On November 2, 2022, UC-1 asked Harry about traveling to New York, “So would you be able to come up our way? Is it too far? What were you thinking. And if so, like can you stay for a while?” To which Harry said, “Society norms would have to be stripped from her and she would have to learn to accept her new place within a family [...] For now it would be difficult for me to relocate there, have you considered Oklahoma, I would imagine that you would have to be licence here. But it would be difficult to play there, especially if you live in a apartment. I do like the thought of the bus and r.v. on private land, and lack of anyone living just a few feet away.” UC-1 replied, “Oh ok. So maybe we come down that way then? I can def try Would there be somewhere we can stay ? [...] Would be longer term if that’s ok. Even if for a couple weeks to start.” Harry replied, “I think you would find the cost, a bit of a shock compared to up north, like regular gas is around 3.15 at the moment [...] We would find the right place [...] And as for longer term, personally permanent to me would be perfect [...] One reason I would prefer here, no one knows Kys here, our would question her about the changes they would begin to see in her behavior [...] Even the first time I enjoy playing with Kys, she will have marks small

bruises from spreading her legs to lick her. She will resist some, simply because what she is experiencing is unfamiliar to her, and goes against what she has been taught. Her little asshole will be sore from me fingering her, even though she will be well lubricated. Her little clit will be swollen from my playing with it, her wrist and ankles would bear marks from the restraints. So regardless of how gentle I was, her molestation would be evident. Of course if I were asked to spank her, she would have a beautiful rosy bottom for several hours as well.”

14. On November 16, 2022, UC-1 explained to Harry that UC-1 and the child would not travel to him if it was inconvenient for Harry, “You’d tell me if we were an imposition I hope. We won’t come if it’s not a good plan for you.” Harry responded, “I live it very much, and I love it even more that you want to be a part of it, and explore things with her as well.”

15. On November 26, 2023, Harry sent a photo of himself, which is referenced further in footnote 2.

16. UC-1 and Harry continued to message, and on December 3, 2022, Harry explained to UC-1 what the first meeting with Harry and the child would be, “Regardless of the way you introduce her to me, I would like to meet her, and hold her. So I would want her to receive her enema and gummy right after I got there that away I can talk with her a “few” minutes. I would love to to hold her as she becomes lucid and slips into semi consciousness. Even as that is happening there would be some intimate and invasive caressing. I want to kiss and lick her little feet, sucking each of her toes. I will enjoy kissing my way up her legs and thighs, I will love licking her tight little asshole as I also begin



playing with her clit teasing her. I hope by this point she is out of it enough to lub her tight little hole and start stretching her asshole a little bit. It would also allow me to massage her prostate as i begin licking her little treasure. I hope to spend some time with this, eventually fully licking and rubbing her clit seeking to bring her to orgasm. Once she is reaches semi to unconscious. I would love to gag her at that point and spank her bottom and little treasure, and probably explore, seeing if she will reach orgasm that away as well. Afterwards I would lick her a little more, and hold her, of course holding her will often lead to playing with her clit.”

17. On December 4, 2022, Harry discussed his desire to live, “off grid”, stating, “But as for my interest in off-grid, it allows for one to enjoy many aspects of life, with out having to worry as much about what the neighbors might hear or see. Especially with young lover and slave that would generally be naked.” Harry went on to share his desire for the child to be drugged during sexual encounters, “I glad you follow my reasoning for her being high for play, it allows for much more invasive play and stretching her asshole. And would also allow for more severe spankings to build up her tolerance for painful play.”

18. On December 13, 2022, Harry tells UC-1 he is a sex offender, “I will tell you something about me, I am a sex-offender so even here it limits where I can live. Something that I feel you should know. And yes rent is cheaper here, though several acres would be a better choice for what we are talking about.” UC-1 replied, “maybe I can look at some land then too.” Harry then said, “It would be perfect for you and Kys, and I can visit as much as possible, with no problem. I do keep a eye out for mom, so that occupies some of my time. But some place around okc would be perfect And I do really care about both of

you, and would love forming our special family unit.”

19. On December 18, 2022, Harry stated to UC-1, “I hope it make you quite wet while watching me play with her, so that when your ready to watch her spanked, your wrt panties can be used as her gag.”

20. On December 26, 2022, Harry continues to detail the sexual acts he will perform on the child saying, “I would absolutely love to wake Kys in the mornings, locking her wrist together, tying each ankle to the footboard of the bed. Being gentle not to awaken her, then preparing her enema for her. And then lubricating the nozzle, awakening her only as the tube is sliding into her tight little hole and releasing the clip formit to flood into filling her with the wine solution.”

21. On December 30, 2022, Harry continues to tell UC-1 his planned acts for the first time Harry meets the child, “She will be penetrated by finger the first time we meet, [...] Both vaginally and anally [...] Hopefully giving her oral, I will begin exploring her orgasms with her [...] Though might also have to use a small vibrator to massage her little clit.”

22. There are numerous messages from Harry to UC-1 inquiring about UC-1 training the child sexually, such as on January 1, 2023, when Harry stated, “It is good to prepare her, and to get her used to being touched by others [...] Did you massage her little clit [...] You should continue with her, to the point of orgasm [...] Something you should explore with her daily.”

23. On January 2, 2023, Harry disclosed to UC-1 the messaging application Harry and UC-1 use to communicate is on Harry’s tablet, “You never pester me, but my

wickr app is on my tablet.”

24. On January 13, 2023, Harry inquires about UC-1 and the child traveling to Oklahoma saying, “I do wish you and Kys were here, unfortunately that doesn’t make your mom’s healthy better. [...] But I’m always here when your ready to come.” UC-1 responded, “Thx. Means a lot. And ty for being so patient. I just wanted her in great shape before we made a move. Your message that you’d wait until we can come meant s lot”. Harry continued, “You both are worth waiting for, [...] But neither will I lie, that last picture of Kys, makes me want to tie her hands, and rip her panties off, and lick her little clit and pussy until she is thrashing on the bed begging you, for me to stop.”

25. On January 24, 2023, UC-1 asked Harry if Harry was still interested in UC-1 and the child traveling to meet Harry. UC-1 stated, “Id like to maybe talk about our trip if its still something u reallly wanna do. I have some planning to do if its going to happen.” Harry replied, “It ok to ask, and I still want you both.”

26. On January 26, 2023, Harry explained to UC-1 his seriousness of making the child his slave saying, “I am serious in that, in presenting Kys collared and on a leash, signifies your approval of her salvery to me [...] When whipping her, she would be blindfolded and tied standing up, with her arms stretched over her head, on her tip-toes. Which would allow me to whip the back of her thighs, bottom, breast, and pussy [...] And of course gagged.”

27. On February 2, 2023, when UC-1 asked Harry, “When did ya think would be a good time for us to come?” Harry responded, “When ever you are ready to [...] I’m sure there are several things that you need to do in order to come here, set up home

schooling, give notice for work, call Roadrunner for a space. But I would love you here as soon as you can be.”

28. Between February 8, 2023, and February 16, 2023, Harry said, “Damn I’m impressed my tablet can do 2 things at once, chat with you and send pictures to my computer [...] Honestly didn’t think it would do it, I figured it would stop sending, when I switched back to wickr.” Later, when UC-1 discussed getting UC-1 and the child’s plans in order, Harry said, “I really would like both of you to come, your both very special, as will our family dynamics be.”

29. In February 2023, Harry continued to chat about his tablet, “I am transferring files from my tablet to my computer, and having to rename them. A number of downloads seems to name themselves “download”, so I am giving them names [...] Then I am grouping them with like minded topics [...] Yes, it’s a pain, then I am finding others on the tablet to send to the computer as well.” Harry later explained he had to start a new chat conversation, “Started a new thread, my tablet was slowing down too much.” And again, Harry referenced his tablet and said, “I’m doing good, sorry I didn’t see your message, I was charging my tablet.”

30. On March 5, 2023, UC-1 told Harry, “Been really thinking about the trip down too. I don’t know if taking the camper down is best idea. At least when we first come. Think I’d prefer to fly and find a decent like extended stay place”. Harry replied, “If you think that’s best”.

31. On March 5, 2023, UC-1 asked Harry if Harry still wants to meet or if UC-1 and child should cancel their plans, “So I guess I’d need to know if you can’t so I can

arrange for a. Uber. This is sort of a big deal for us and you're seemingly not interested. U need to let me know and I'll cancel." Harry replied, "I just don't know what my schedule will be, as to interested, I am very interested." Harry went on to say later, "You know that you cant bring gummies or any weed on the airplane". UC-1 responded, "Oh ok. Maybe I'll look into the bud or train. Bus [...] I've don't trains before. It's easy literally just metal detector [...] They don't look through bags and in NY it's legal so it's not an issue." Harry said, "Cool". In regards to a hotel in Oklahoma City for UC-1 and the child, Harry later said, "Thought I would look for more s.w. Oklahoma City, those around the train station would be downtown and bricktown, and lots more expensive."

32. On March 9, 2023, UC-1 said, "I'll probably get lit<sup>4</sup> tix next week. Ur still good for the 22<sup>nd</sup>?" Harry answered, "Absolutely."

33. On March 10, 2023, Harry continued with details of engaging in sexual acts with the child, "I have no problems with, smearing a little bit of honey on her, little treasure, and licking it off, then sliding my finger inside of her as I spread her open and lick her little pearl. Then telling her to do the same with you."

34. On March 11, 2023, in response to UC-1 having had asked Harry for assistance in finding a hotel in Oklahoma City for UC-1 and the child, Harry sent screen shots to UC-1 of Extended Stay America Select Suites – Oklahoma City – West, located at 4300 W I-40 Service Rd, Oklahoma City, OK 73108. Harry went on to say, "I would probably see what it cost to join, I believe the prices shown is for members [...] For that

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<sup>4</sup> UC-1 mistyped "lit" instead of "the".

price, I think you have to join there club, so you should check that to see, otherwise I believe it's more expensive."

35. Also, on March 11, 2023, Harry said, "That's great, I hope I don't scare her", and sent a screen shot of a hand with a device placed on a diagram of what appeared to be a vagina. Harry then said, "The perfect sized toy [...] It's perfect for giving a woman orgasm after orgasm after orgasm [...] She will learn to love it, in some things she will have absolutely no choice but to endure."

36. On March 11, 2023, Harry explained to UC-1, "You do understand that I look after mom quite a bit, and take her to all of her appointments. After someplace is found, then most of the time I would stay there at night. But I can just stay anywhere, and I would prefer the neighbors to be a little bit a way for the house."

37. On March 15, 2023, UC-1 brought up the trip to Oklahoma City saying, "So I thought we should talk about next week. It's finally here." Harry replied, "Sure, that sounds good [...] What are your thoughts." UC-1 asked, "Would Wednesday still be a good day to meet up?" To which Harry replied, "Absolutely." Later, UC-1 said, "I hope youre ok with all this. Know its a lot. and honestly if I need to cancel I will. Its getting to the point where I just truly need to know. Its just such a big change for us. I might doze here. maybe we can talk more tomorrow about our day wednesday." Harry replied, "I would love for you both to come."

38. On March 16, 2023, after Harry asked UC-1 how UC-1's day was going, UC-1 replied, "Hey Steven. Im good! Just excited for next week." Harry responded, "I am also looking forward to it." UC-1 asked Harry, "What time were ya thinking Wednesday?"

did you wanna come over early? [...] Like should I give her a gummy early?" Harry replied, "Yes it will be early, you can give it to her after I get there [...] I will probably be there 7:30 might even bring you coffee, let her sleep we can chat a little bit". UC-1 responded, "Id love that! maybe bring her a hot cocoa or something too?" Harry answered, "Ok".

39. On March 18, 2023, Harry said, "Good morning Hayley, how are you and Kys this morning, looking forward to seeing you both". UC-1 said, "Im great! Super excited too". Later, Harry said, "I would love for her to shower wensday morning after I get there, I would love for it to be a very, very intimate shower with you [...] Then fo her comfort, she may wear her t-shirt, o less, depending on how shy she is, but I would like you dressed the same if your comfortable as well". UC-1 replie, "Ok I can bring a good t shirt for me too. Ive been telling her nude was preferred as we discussed so I think she will be comfortable with it". Harry then said, "I think from the very beginning, she should start learning what is acceptable for her, and I hope you will be comfortable, in that with her seeing you will accept it much quicker [...] and hopefully she will come sit in my lap [...] And a little bit, after showering would probably be a good time for her gummy [...] I will take my time with her, asking her, holding her".

40. On March 19, 2023, Harry instructed UC-1, "When you arrive, send me your room and floor number". To which UC-1 replied, "Ok yea!". Harry then said, "Getting to be about time". As Harry and UC-1 discussed public transportation and the trip, Harry asked, "You have treats and reading material [...] Handcuffs for playtime with Kys". UC-1 answered, "Have plenty of goodies and gummies! Didnt bring any restraints tho wasnt

sure if they'd be looked at. Lol". Harry went on, "I am sure they have seen it all, and don't even ask [...] I am sure, she will be easy enough to restrain when the time comes [...] But store bought dog and cat collars would have been looked at for what they were, leather wrist and ankle cuffs probably would have been seen for what they were, but they would have thought they were yours, and that you were probably a very naughty girl {emoji of smiley face with heart eyes}". UC-1 replied, "I can get those at wal mart too". Harry responded, "No need,". Later in the chat, UC-1 said, "might hit these soon!!", and sent a photo of a black container labeled Theory Chews, cannabis chews. Harry replied, "I hope they relax her, so we can both enjoy her". UC-1 then said, "Ugh yes me too. I think she'll do great o it and really let loose". Harry said, "It's important she enjoys it to". UC-1 went on, "I completely agree. U want this to be enjoyable or at least she needs to know its important to learn if it doesnt always feel good. I know shel'll be ready tho. It's been a process and shes done so well". Harry then said, "I'm extremely happy, that you have taken the time, to start teaching her as I wanted, and together we will explore much more with her. [...] I'm sure when I start exploring giving her oral, she will be apprehensive, but as I lear her body, I hope she comes to enjoy it". Harry added, "I feel it's important for her to know how to give pleasure to men and women".

41. On March 20, 2023, as UC-1 and Harry are discussing the experience of the train ride, and making the child more comfortable during the trip, Harry said, "Of course a remote control vibrator would dhave made the trip more interesting for her {emojo of a smiley face with hands} [...] I think in public it would be fun, But the little bullet vibrator, to massage her little clit and pussy while her wrist and ankle are restrained, I think would



become my favorite”. UC-1 answered, “It would be so much fun!!” Harry added, “As I have said, I want to kiss her, from the top of her head to the bottoms of her feet, then slowly work my way back up [...] Just cut 4 straps for anklets and bracelets {emoji of smiley face} And”. Later in the day, Harry continued with, “I’m not sure she will like her bracelets, they will keep her as placed<sup>5</sup> [...] They will be a little uncomfortable until they are broken in, and that will take quite a while”.

42. On March 21, 2023, Harry greeted UC-1 with, “Good morning Hayley, how are you and Kys this morning”. UC-1 replied, “Hey Steven {emoji of a smiley face} [...] We’re good. Almost done w this loooooong trip lol.” Harry replied, “{blue heart emoji} Yes it’s a long trip, but I’m happy you are making it {blue heart emoji} [...] Just finished with Kys anklets and bracelets”. UC-1 said, “Oh yay!! She’ll be so excited!” Harry went on, “I’m not sure exactly how excited she will be, when she understands there function and purpose”. UC-1 replied, “She’ll love the idea that it’s special and just for her”. Harry then said, “Though she will be even more beautiful wearing them, and soon I will also make her a necklace to go with them”. UC-1 replied, “Oh wow. She’ll feel like a princess”. Harry continued, “She will be my little princess”.

43. On March 22, 2023, Harry arrived at Extended Stay America Select Suites – Oklahoma City – West, located at 4300 W I-40 Service Rd, Oklahoma City, OK 73108, to engage in sexual acts with UC-1’s minor child. Harry arrived in a silver Honda Odyssey bearing Oklahoma license plate FVH-328, registered to his mother, Carol Cummings at

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<sup>5</sup> Harry sent an image of two brown leather straps with buckles, but then deleted the image before it could be preserved.

2701 SW 85<sup>th</sup> St., Oklahoma City, Oklahoma 73159. Harry exited the vehicle and walked around to smoke a cigarette in front of the hotel. After, Harry went to the vehicle and grabbed a black bag from the vehicle and begin walking towards the entrance of the hotel. At that time, law enforcement effected a warrantless arrest and took Harry into custody. The black bag was searched for officer safety, and contained restraints, tools, a pig mask, and other leather items. There was another 7-11 bag that contained a chocolate milk and donuts. Also of note, one of the leather pieces found on Harry's person contained the writing, "4<sup>th</sup> - 427", indicating the floor and room number of where UC-1 and the child were staying. See photos of bag contents and the leather piece containing the room information:










**CONCLUSION**


44. Based on the aforementioned information, this Affiant respectfully submits that there is probable cause to believe that Steven Neel Harry was involved in using a facility or means of interstate and foreign commerce, namely, a tablet, a tablet's data, a computer, an encrypted social media messaging site, and the Internet, knowingly attempted to persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in sexual activity in violation of 18 U.S.C. § 2422(b).

45. This Affiant, therefore, respectfully requests a complaint be issued for Steven Neel Harry.



MARISOL FLORES  
SPECIAL AGENT  
FEDERAL BUREAU OF INVESTIGATION

Signed and sworn before me this 22<sup>nd</sup> day of  
March 2023.



AMANDA MAXFIELD GREEN  
UNITED STATES MAGISTRATE JUDGE

**CRIMINAL COVERSHEET**

**U.S. District Court, Western District of Oklahoma**

Petty  Misdemeanor  Felony  USAO No.: \_\_\_\_\_ Case No.: \_\_\_\_\_

Charging Document: Complaint No. of Defendants: 1 Total No. of Counts: 1 Sealed: Y

Forfeiture: Y  OCDEF: Y  McGirt: Y  Warrant  Summons  Notice  N   
 N  N  N  Companion Case No. (if any): \_\_\_\_\_

**DEFENDANT INFORMATION:**

By: \_\_\_\_\_

Name: <b>Steven Neel Harry</b>			
Alias(es):		Address:	
		FBI No.:	
DOB: 1961	SSN: 8297	Race: White	Interpreter: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Sex: M <input checked="" type="checkbox"/> F <input type="checkbox"/>	Juvenile: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Language/Dialect: English	

**DEFENDANT STATUS/RECOMMENDATION:**

**PRIOR MAGISTRATE JUDGE PROCEEDINGS:**

<input checked="" type="checkbox"/> Not in Custody	<input checked="" type="checkbox"/> Detention Requested	Complaint: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
<input type="checkbox"/> Type of Bond: _____		Magistrate Judge Case No.: MJ-
<input type="checkbox"/> In Custody at: _____		Previously Detained: Y <input type="checkbox"/> N <input checked="" type="checkbox"/>
Inmate/Prisoner/Register No.: _____		

**ATTORNEY/AGENCY INFORMATION:**

<input type="checkbox"/> Public Defender	Name: _____	AUSA: <u>Brandon Hale</u>
<input type="checkbox"/> CJA Panel	Address: _____	Agent /Agency: <u>FBI</u>
<input type="checkbox"/> Retained	Phone: _____	Local Officer/Agency: _____

**CHARGING DETAILS**

<b><u>Count(s)</u></b>	<b><u>U.S.C. Citation(s)</u></b>	<b><u>Offense(s) Charged</u></b>	<b><u>Penalty</u></b>
1	18 U.S.C. § 2422(b)	Attempt to Entice or Coerce a Minor	NLT 10 years' imprisonment-or up to life, \$250,000 fine, o/b; NLT 5 years'-up to life- supervised release, \$55,100 special assessment.

Signature of AUSA: s/ Allison Christain

Date: 03/21/2023