

JUSTICE COURT

MAR 01 2024

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IN THE JUSTICE COURT OF RECORD
IN AND FOR THE COUNTY OF GALLATIN, MONTANA

* * * * *

STATE OF MONTANA,

Plaintiff,

vs.

CHRISTOPHER BRANDON FOILES,

Defendant.

) Case No.: CR-2024-56
)
) AFFIDAVIT OF PROBABLE CAUSE AND
) MOTION IN SUPPORT OF FILING A
) COMPLAINT
)
)
)
)

COMES NOW, the State of Montana by Chief Deputy County Attorney Shannon R. Foley, and being first duly sworn upon oath, deposes and says as follows: Your affiant is the Chief Deputy Gallatin County Attorney, and by law one of the attorneys to prosecute criminal matters in the State of Montana. Your affiant is aware of the following facts based on a report of investigation by the Bozeman Police Department.

1. On or about December 31, 2023, Detective Mike Mertz of the Montana State University Police Department assigned to the Bozeman Special Victims Unit, assumed investigative responsibility for a missing person's report regarding the unknown whereabouts of Megan Ashley Stedman (Stedman).

2. Upon speaking with members of Stedman's family and after reviewing the initial report taken by officers of the Bozeman Police Department on December 30, 2023, Detective Mertz learned that Stedman was traveling with her dog Cali, and her boyfriend, Christopher

1 Brandon Foiles (hereinafter the Defendant), between Spokane, Washington, and Colorado in a
2 1973 white Dodge RV they purchased together.

3 3. Detective Mertz received information that Stedman and the Defendant had a
4 contentious relationship which involved the Defendant being arrested on November 11, 2023, for
5 Felony Partner Family Member Assault (PFMA) in Livingston, Park County, Montana. Stedman
6 was the victim of the reported PFMA. Detective Mertz discovered that the RV had broken down
7 near Livingston and was parked at the Town Pump (2200 W Park St. Livingston MT) sometime
8 in late Summer/early Fall 2023.

10 4. Detective Mertz received information that Stedman had not contacted her family in
11 a number of weeks, that her phone had been shut off since December 15, 2023, and attempts to
12 ping both Stedman's and Defendant's cell phones were unsuccessful as both parties' phones
13 appeared to be turned off. Detective Mertz was further informed that the whereabouts of
14 Stedman's dog Cali were also unknown.

16 5. Upon further investigation, Detective Mertz discovered that the day Stedman's
17 phone stopped transmitting a signal, she made numerous CashApp requests to friends asking for
18 money for various reasons. Stedman's family advised she would typically use CashApp, Venmo,
19 and other methods of electronically transferred funds instead of using traditional banking.

21 6. According to a report from the Livingston Police Department regarding the PFMA
22 incident on November 11, 2023, the Defendant made a statement directed toward Stedman during
23 the incident to the effect of, "You're a dumb bitch and dumb bitches don't deserve to live." During
24 the Defendant's incarceration in the Park County Detention Center, numerous individuals who
25 spoke with Stedman recalled her demonstrating what appeared to be genuine fear of the Defendant.

1 7. The Defendant was released from the Park County Detention Center on December
2 8, 2023, after posting bond.

3 8. On December 14, 2023, the Defendant and Stedman are seen together on camera in
4 the Bozeman Walmart (1500 N 7th Ave Bozeman, MT), which is a violation of the No Contact
5 Order in place between the Defendant and Stedman (stemming from the November 11th PFMA).

6 9. The Walmart video footage shows Stedman wearing a black jacket, a black
7 sweatshirt with white lettering reading, "smile more b*tch less", leopard or cheetah printed pants,
8 and black boots. After Stedman and the Defendant depart from Walmart with their purchases of
9 food and other household items, Stedman is never seen again on camera nor confirmed to be seen
10 by any person.

11 10. On December 15, 2023, the Defendant is seen entering Walmart alone. The
12 Defendant makes various purchases including, but not limited to, an area rug, paper towels,
13 pliers/box cutter combination, zip lock bags, bleach/cleaner, spray paint, stickers, duct tape, a lock,
14 bolt cutters, a hack saw, drywall saw, gorilla grip gloves, paracord, 55-gallon contractor bags, and
15 various food and hardware items.

16 11. The December 15th Walmart video also shows a bandage on the Defendant's left
17 middle finger that was not seen in the Walmart video the day prior, as well as other small
18 lacerations on his hands. The Defendant's boots, which were scuffed and dirty in the Walmart
19 video on the 14th, appear clean on the camera footage from the 15th.

20 12. Detective Mertz knows from training and experience that the items purchased by
21 the Defendant are consistent with those often used to clean up and conceal a violent incident.
22 Furthermore, Detective Mertz also knows from training and experience that during a violent
23 encounter where a knife is in play by the aggressor, inadvertent injuries can be sustained to the
24 aggressor.

25 13. During his investigation, Detective Mertz learned that on December 15th, a number
26 of CashApp requests to close friends originated from Stedman's phone. Many describe the requests
27 as unusual and multiple individuals suspected it was not Stedman that was sending the messages.
28

1 Detective Mertz also learned it was likely Stedman and the Defendant had access to each other's
2 CashApp accounts.

3 14. On December 15th around 8:00 p.m., Stedman's cell phone ceased operations
4 which, according to friends and family, seemed unusual and uncharacteristic as she was a very
5 frequent user of her cell phone, active on multiple social media platforms, and used her cell phone
6 (CashApp and Venmo) for her day-to-day expenses.

7 15. On December 16, 2023, the Defendant is again seen on video entering the Bozeman
8 Walmart to return some items purchased the day prior. The Defendant then returned to the RV
9 before coming back into Walmart a few hours later. The Defendant purchased multiple gallons of
10 water, Scent Killer, Great Value brand cleaner, bleach, hand towels, more tape, spray paint, and
11 curtains. During the day on the 16th, Walmart video footage shows the Defendant moving the RV
12 from the Southwest corner of the Walmart parking lot to the North end of the lot. During this
13 transition, the RV is seen with what appears to a blacked out rear window and damage appears to
14 have been repaired to the middle/passenger side of the glass.

15 16. On December 19, 2023, the RV appears at a gas station in Island Park, Idaho. From
16 the photographs obtained from the gas station, the damage appears to be consistent with that seen
17 in Bozeman days prior. Additionally, the red accents previously seen on the RV are now spray
18 painted blue and stickers have been placed on the rear of the RV. The stickers and blue spray paint
19 are consistent with those purchased by the Defendant at Walmart in Bozeman. The Defendant is
20 seen on camera entering the gas station. During this period of time, Stedman is never seen leaving
21 the RV.

22 17. On or about January 12, 2024, Idaho Falls Police Department (IFPD) received a tip
23 regarding a possible sighting of the RV inside their city limits. IFPD officers located the RV and
24 attempted contact, but no one answered. IFPD Detectives set up a perimeter on the RV for
25 surveillance purposes while Detective Mertz and Bozeman PD Detective Ben King traveled to
26 Idaho Falls to assist in seeking a search warrant of the RV. While enroute to Idaho Falls, Detective
27 Mertz was informed that a male emerged from the RV. The male ultimately identified himself as
28

1 Christopher Foiles and made the spontaneous utterance, "My name is Chris Foiles, I killed my
2 girlfriend, she's in the RV."

3 18. Idaho Falls detectives took the Defendant into custody and secured the RV. Upon
4 searching the RV pursuant to a search warrant, the body of a person matching the description of
5 Megan Stedman was located, though an immediate identification could not be made due to the
6 condition of the body.

7 19. While speaking to IFPD Detectives, the Defendant admitted to using a kitchen knife
8 to kill Stedman. A kitchen knife matching that description given by the Defendant was located
9 inside the RV. The Defendant also made a statement that after his attack on Stedman, she attempted
10 to break out the back window of the RV in an attempt to escape. This allegedly caused damage
11 which was seen to be repaired by duct tape and black spray paint on the December 16th Bozeman
12 Walmart video. The Defendant stated he knew Stedman was going to succumb to the wounds he
13 inflicted but noted she was still moving in the back of the RV. This prompted the Defendant to
14 stab Stedman numerous times until, as the Defendant described, "she stopped moving."

15 20. According to Idaho Falls detectives, the Defendant indicated that he stabbed
16 Stedman in the parking lot of the Idaho Falls Walmart.

17 21. Idaho Falls detectives seized evidence containing biological matter (blood), various
18 knives/cutting implements, personal documents belonging to Stedman and other items pertinent to
19 the homicide investigation.

20 22. During an interview with the Defendant on a later date, he would state that on
21 December 15, 2023, Stedman's dog Cali had mysteriously gone missing. The Defendant also stated
22 he took Stedman's cell phone and buried it in a local Bozeman park as to keep her phone from
23 being tracked. The Defendant originally stated he intended to retrieve the cell phone eventually,
24 which is why it was wrapped in two baggies, though when the cell phone was located in the
25 location that he described, it was not packaged. The Defendant stated he took Stedman's SIM card
26 out of her cell phone before burying it. According to the Defendant he did this and other acts in
27 an effort to evade detection from law enforcement for a violation of his No Contact Order.

1 23. The Defendant would later admit to killing Stedman's dog, Cali, though means and
2 method are unknown at this time.

3 24. On January 10, 2024, Detective Mertz contacted the Defendant's bondsman.
4 Detective Mertz was informed that the Defendant had been evading using their check-in system
5 which captures IP location data. In the email check-ins the Defendant did complete, the Defendant
6 communicated that he did not have a phone (The investigation revealed Foiles in fact had two
7 phones), he was working for All Things Drywall (The investigation revealed Foiles was confirmed
8 to not be working for said company), he was living at HRDC in Bozeman (The investigation
9 revealed he was not, but rather living out of the RV in Idaho Falls), and that he was at Rocky
10 Mountain Treatment, a rehab facility (The investigation revealed Foiles was not in rehab).

11 25. The Defendant would state in an interview that these communications to his
12 Bondsman were all intentionally misleading to throw law enforcement off his trail. The Defendant
13 further stated the same reasoning for painting the RV with the blue stripe, placing various types of
14 stickers on the RV, and leaving a note on the RV with a name signed that was not his.

15 26. Detective Mertz was informed by Idaho Falls detectives that on February 8, 2024,
16 the Defendant placed a call from the Bonneville County Jail. In the recorded phone call, the
17 Defendant admitted to killing Stedman in Bozeman, Montana.

18 27. During the same recorded phone call wherein, the Defendant admits to the homicide
19 occurring in Bozeman, the Defendant details the events proceeding the stabbing resulting in
20 Stedman's death. The Defendant describes a physical altercation between Stedman and himself
21 inside the RV where he was, "pinning" Stedman to the ground. The Defendant describes this act
22 as sexually related which appears to be sexually aggressive in nature. On the jail call the Defendant
23 states Stedman seemed fearful the Defendant was going to "rape her" and told her, "This is what
24 you want me to be like, huh, you want to be mad at each other and then fuck." The Defendant then
25 describes getting off Stedman a short time later and exited the RV. Stedman then locked the
26 Defendant out of the RV. The Defendant proceeded to, as he describes in the call, "bust through
27 the door" to get back into the RV. Stedman allegedly confronted the Defendant which is when
28 the Defendant picked up the knife previously described and stabbed Stedman.


1 28. As a result of the evidence and information gathered by detectives and the
2 corroborating statements from the Defendant, the investigation was transferred back to the
3 Bozeman Police Department for further investigation and charging considerations.

4 Based on the forgoing facts, the undersigned moves the Court to find that probable cause
5 exists to file an Information charging Defendant with the crime(s) of:

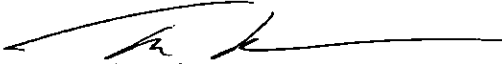
6
7 **COUNT 1:** Deliberate Homicide, a Felony, in violation of Mont. Code Ann. § 45-5-201;
8 **COUNT 2:** Aggravated Animal Cruelty, a Misdemeanor, in violation of Mont. Code Ann. § 45-
9 8-217; **COUNT 3:** Theft of Identity, a Misdemeanor, in violation of Mont. Code Ann. § 45-6-332.
10 **COUNT 4:** Tampering with or Fabricating of Physical Evidence, a Felony, in violation of Mont.
11 Code Ann. § 45-5-207. **COUNT 5:** Violation of a No Contact Order, a Misdemeanor, in violation
12 of Mont. Code Ann. § 45-5-209. **COUNT 6:** Obstructing a Peace Officer or Other Public Servant,
13 a Felony, in violation of Mont. Code Ann. § 45-7-302.
14

15
16 Dated this 1st day March 2024 in Gallatin County, Montana.

17 By: Gallatin County Attorney's Office

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19 
20 Shannon R. Foley
21 Deputy County Attorney

22 SUBSCRIBED and SWORN to before me this 1st day of March, 2024.

23
24 
25 NOTARY PUBLIC FOR THE STATE OF MONTANA
26 Residing at: Bozeman, Montana
27 My commission expires: 8/2/27

