

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

**FILED**

UNITED STATES OF AMERICA, )  
)  
                          *Plaintiff,* )  
)  
v. )  
)  
EDWARD LEON FIELDS, JR., )  
)  
                          *Defendant.* )

MAR 15 2004

William B. Gault,  
Clerk, U.S. District Court

By \_\_\_\_\_ Deputy Clerk

No. CR-03-73-WH

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

COMES NOW the United States of America, by and through Sheldon J. Sperling, United States Attorney, and Linda A. Epperley, Assistant United States Attorney, both for the Eastern District of Oklahoma, and pursuant to Title 18, United States Code, Section 3593(a), files this Notice of Intent to Seek the Death Penalty, notifying the Court and the defendant that, in the event the defendant is convicted of either of the offenses of First Degree Murder as alleged in the Indictment returned in this case, the Government believes a sentence of death is justified under Chapter 228 (Sections 3591 through 3598) of Title 18 of the United States Code, and the Government will seek a sentence of death.

If the defendant is convicted, the Government intends to prove the following aggravating factors as the basis for the imposition of the death penalty.

**A. Statutory Proportionality Factors Enumerated Pursuant to Title 18, United States Code, Sections 3591(a)(2)(A) through (D)**

1. Edward Leon Fields, Jr., intentionally killed Charles Glenn Chick, Jr.

[18 U.S.C. §3591(a)(2)(A)]

2. Edward Leon Fields, Jr., intentionally killed Shirley Elliott Chick.

[18 U.S.C. §3591(a)(2)(A)]

**B. Statutory Aggravating Factors Enumerated Pursuant to Title 18, United States Code, Sections 3592(c)(1) through (16)**

1. Edward Leon Fields, Jr., committed the murder of Charles Glenn Chick, Jr., after substantial planning and premeditation. [18 U.S.C. §3592(c)(9)].

2. Edward Leon Fields, Jr., committed the murder of Shirley Elliott Chick, after substantial planning and premeditation. [18 U.S.C. §3592(c)(9)].

3. Edward Leon Fields, Jr. intentionally killed and attempted to kill more than one person, by killing Charles Glenn Chick, Jr., and Shirley Elliott Chick in a single criminal episode. [18 U.S.C. §3592(c)(16)].

**C. Non-Statutory Aggravating Factors Enumerated Pursuant to Title 18, United States Code, Sections 3593(a)**

1. Edward Leon Fields, Jr., poses a future danger to the lives and safety of other persons, as evidenced by one or more of the following:

(a) the offenses were part of a continuing pattern of threatened and impending violence,

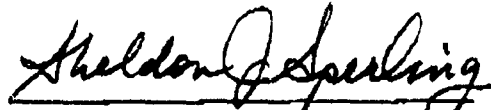
(b) the offenses were part of an escalating and accelerating "thrill-seeking" pattern of behavior,

(c) the offenses were part of an on-going pattern of threatening and demeaning behavior toward women, and

(D) the defendant's lack of remorse.

2. Edward Leon Fields, Jr., caused permanent injury, loss and harm to the family of Charles Glenn Chick, Jr. based upon the victim's personal characteristics as an individual human being and the impact of his death on the victim's family.
3. Edward Leon Fields, Jr., caused permanent injury, loss and harm to the family of Shirley Elliott Chick based upon the victim's personal characteristics as an individual human being and the impact of her death on the victim's family.
4. Edward Leon Fields, Jr., caused permanent injury, loss and harm to the friends, co-workers and community of Charles Glenn Chick, Jr. based upon the victim's personal characteristics as an individual human being and the impact of his death on the victim's friends, co-workers and community.
5. Edward Leon Fields, Jr., caused permanent injury, loss and harm to the friends, co-workers and community of Shirley Elliott Chick based upon the victim's personal characteristics as an individual human being and the impact of her death on the victim's friends, co-workers and community.
6. Edward Leon Fields, Jr., inflicted mental anguish, including Shirley Elliott Chick's uncertainty as to her ultimate fate, before Shirley Elliott Chick's death.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was served on the party herein by mailing the same on the 15th day of March, 2004, to counsel for defendant, as follows:

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