

INDICTMENT

Capital Murder §97-3-19(2)(e)
Kidnapping §97-3-53
Sexual Battery, §97-03-95(1)(d)

CIRCUIT COURT NO. 24-469WIK

THE STATE OF MISSISSIPPI

FILED

Circuit Court

FIRST DISTRICT, HINDS COUNTY

JUN 28 2024

June Term, A.D., 2024
First Judicial District
of Hinds County

ZACK WALLACE, CIRCUIT CLERK

BY _____ D.C.

The Grand Jurors of the State of Mississippi, taken from the body of good and lawful persons of the First Judicial District of Hinds County, in the State of Mississippi, elected, impanelled, sworn and charged to inquire in and for said District, County and State aforesaid, in the name and by the authority of the State of Mississippi, upon their oath present: That

Victoria Cox

while acting alone and/or in concert with and/or aiding, assisting or encouraging another or others; to-wit, Daniel Wayne Callihan

In said District, County and State

COUNT I

on and about the 13th day of June, 2024, in the county aforesaid and within the jurisdiction of this Court, the said defendant being a female human being above the age of eighteen (18) years, did, while acting alone and/or in concert with and/or aiding, assisting or encouraging Daniel Wayne Callihan and/or others known and unknown to the grand jury, willfully, unlawfully, and feloniously kill, a human being, Erin Nicole Brunett, a four (4) year old female child, whose date of birth is October 28, 2019, without the authority of law by any means or in any manner, done with or without design to effect death of Erin Nicole Brunett, while engaged in the commission of the crime of the kidnapping, specifically the kidnapping of Erin Nicole Brunett, or in any attempt to commit such felony as prohibited by Mississippi Code Annotated §97-3-53, all occurring within the jurisdiction of this court and in violation of Section 97-3-19(2)(e) Mississippi Code Annotated (1972, as amended); and,

COUNT II

based upon a series of acts connected together and constituting parts of a common scheme and plan, said Victoria Cox being a female human being above the age eighteen (18) years, did, while acting alone and/or in concert with and/or aiding, assisting or encouraging Daniel Wayne Callihan and/or others known and unknown to the grand jury, on and about the 13th day of June, 2024, in

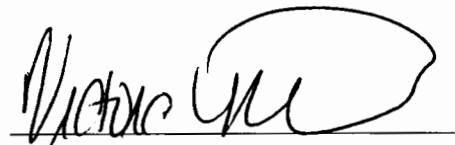
the county aforesaid and within the jurisdiction of this Court, willfully, unlawfully, feloniously and without lawful authority forcibly seized, inveigled, kidnapped and/or confined J.B. a six (6) year old female child, whose date of birth is October 5, 2017, against her will and/or against the will of her parents, guardian(s) or persons having lawful custody of her, by forcibly confining her at or near 3980 Boozier Drive, Jackson, Mississippi, all occurring within the jurisdiction of this court, in violation of Mississippi Code Annotated Section 97-3-53(1972, as amended); and,

COUNT III

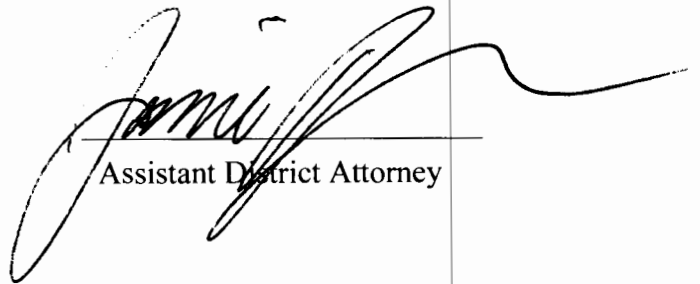
based upon a series of acts connected together and constituting parts of a common scheme and plan, said Victoria Cox being a female human being above the age eighteen (18) years, did, while acting alone and/or in concert with and/or aiding, assisting or encouraging Daniel Wayne Callihan and/or others known and unknown to the grand jury, on and about the 13th day of June, 2024, in the county aforesaid and within the jurisdiction of this Court, willfully, unlawfully, and feloniously engage in sexual penetration, as defined by Mississippi Code Annotated §97-3-97, with J.B. a six (6) year old female child, whose date of birth is October 5, 2017, by engaging in cunnilingus with six year old J.B., at a time when said Victoria Cox was more than twenty-four (24) months older than J.B., all occurring within the jurisdiction of this court and in violation of Section §97-03-95(1)(d), Mississippi Code Annotated (1972, as amended).

All of the above, Count I, Count II, and Count III, being contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Mississippi.

Endorsed: A True Bill



Foreman of the Grand Jury



Assistant District Attorney