

**SEALED**

**FILED**

NOV 02 2020

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA** Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

<p><b>UNITED STATES OF AMERICA,</b></p> <p style="text-align: center;"><b>Plaintiff,</b></p> <p><b>v.</b></p> <p><b>CHRISTINA ANN CALHOUN, VICTOR MANUEL CASTRO HUERTA, a/k/a "VICTOR LOPEZ," a/k/a "VICTOR CASTRO,"</b></p> <p style="text-align: center;"><b>Defendants.</b></p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Case No. <b><u>20 CR 255 CVE</u></b></p> <p><b><u>FILED UNDER SEAL</u></b></p> <p><b><u>INDICTMENT</u></b></p> <p><b>[COUNT 1: 18 U.S.C. §§ 1151, 1153, and 2, and 21 O.S. § 843.5(C) – Child Neglect in Indian Country;</b></p> <p><b>COUNT 2: 18 U.S.C. §§ 1151, 1152, 13, and 2, and 21 O.S. § 843.5(C) – Child Neglect in Indian Country]</b></p>
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**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. §§ 1151, 1153, and 2, and 21 O.S. § 843.5(C)]**

From in or about 2012 and continuing until on or about November 29, 2015, within Indian Country in the Northern District of Oklahoma, the defendant, **CHRISTINA ANN CALHOUN**, an Indian female responsible for the health, safety, and welfare of A.S.C., a child under the age of eighteen, as aided and abetted by defendant Victor Manuel Castro Huerta, did willfully and maliciously fail and omit to provide adequate nurturance and affection, food, shelter, hygiene, sanitation, appropriate education, supervision and appropriate caretakers, behavioral health care, and medical and dental care to, and special care made necessary by the physical and mental condition of A.S.C.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2, and Title 21, Oklahoma Statutes, Section 843.5(C).

**COUNT TWO**


**[18 U.S.C. §§ 1151, 1152, 13, and 2, 21 O.S. § 843.5(C)]**

From in or about 2012 and continuing until on or about November 29, 2015, in Indian Country in the Northern District of Oklahoma, the defendant, **VICTOR MANUEL CASTRO HUERTA, a/k/a “VICTOR LOPEZ,” a/k/a “VICTOR CASTRO,”** a non-Indian male responsible for the health, safety, and welfare of A.S.C., a child under the age of eighteen, as aided and abetted by defendant Christina Ann Calhoun, did willfully and maliciously fail and omit to provide adequate nurturance and affection, food, shelter, hygiene, sanitation, appropriate education, supervision and appropriate caretakers, behavioral health care, and medical and dental care to, and special care made necessary by the physical and mental condition of A.S.C.

All in violation of Title 18, United States Code, Sections 1151, 1152, 13, and 2, and Title 21, Oklahoma Statutes, Section 843.5(C).

R. TRENT SHORES  
UNITED STATES ATTORNEY

A TRUE BILL

  
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KRISTIN F. HARRINGTON  
Assistant United States Attorney

          /s/ Grand Jury Foreperson            
Grand Jury Foreperson