

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

STATE OF DELAWARE

V.

DEJOYNAY M. FERGUSON

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)

INDICTMENT BY THE GRAND JURY
I.D.# 1909003282

The Grand Jury charges DEJOYNAY M. FERGUSON with the following offenses:

COUNT I. A FELONY

#N _____

MURDER BY ABUSE OR NEGLECT FIRST DEGREE in violation of Title 11, Section 634 of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 5th day of September, 2019, in the County of New Castle, State of Delaware, did recklessly cause the death of [REDACTED], a child, through an act of abuse or neglect of such child.

COUNT II. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 16th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT III. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 16th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT IV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 17th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT V. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 18th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT VI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 18th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT VII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 19th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT VIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 19th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT IX. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 22nd day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT X. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 22nd day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 23rd day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 23rd day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 24th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XIV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 24th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 25th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XVI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 25th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XVII. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 25th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XVIII. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 26th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XIX. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 26th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XX. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 26th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXI. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 30th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXII. A FELONY

#N_____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 30th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 30th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXIV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 30th day of July, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 1st day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXVI. A FELONY

#N _____

CHILD ABUSE SECOND DEGREE in violation of Title 11, Section 1103A of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 1st day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause physical injury to [REDACTED], a person who has not yet reached 3 years of age.

COUNT XXVII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 1st day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXVIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 1st day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXIX. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 2nd day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXX. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 5th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 5th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 5th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 6th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXIV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 6th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 7th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXVI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 7th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXVII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 7th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXVIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 8th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XXXIX. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 8th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XL. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 14th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 15th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 15th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLIII. A FELONY

#N _____

CHILD ABUSE SECOND DEGREE in violation of Title 11, Section 1103A of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 15th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause physical injury to [REDACTED] a child who has not yet reached 3 years of age.

COUNT XLIV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 16th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLV. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 19th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLVI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 26th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLVII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 28th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT XLVIII. A FELONY

#N _____

CHILD ABUSE SECOND DEGREE in violation of Title 11, Section 1103A of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 28th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause physical injury to [REDACTED], a person who has not yet reached 3 years of age, through an act of abuse or neglect of such child.

COUNT XLIX. A FELONY

#N _____

CHILD ABUSE SECOND DEGREE in violation of Title 11, Section 1103A of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 28th day of August, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause physical injury to [REDACTED], a person who has not yet reached 3 years of age, through an act of abuse or neglect of such child.

COUNT L. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 3rd day of September, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT LI. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 4th day of September, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT LII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 4th day of September, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED], a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

COUNT LIII. A FELONY

#N _____

CHILD ABUSE FIRST DEGREE in violation of Title 11, Section 1103B of the Delaware Code.

DEJOYNAY M. FERGUSON, on or about the 5th day of September, 2019, in the County of New Castle, State of Delaware, being a person 18 years of age or older, did recklessly or intentionally cause serious physical injury to [REDACTED] a person who has not yet reached 18 years of age, through an act of abuse or neglect of such child.

A TRUE BILL

(FOREPERSON)

KATHLEEN JENNINGS
ATTORNEY GENERAL



DEPUTY ATTORNEY GENERAL