

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

THE STATE OF DELAWARE : ID NO 2009014801 (BHAAS)  
 : 2009014673 (KHAAS)  
 v. :  
 : **REINDICTMENT BY THE**  
 BRANDON L HAAS :  
 KRISTIE L HAAS :  
 : GRAND JURY

The Grand Jury charges BRANDON L HAAS and KRISTIE L HAAS  
with the following offense(s):

COUNT 1 K21-\_\_\_\_\_ (KHAAS)

MURDER BY ABUSE OR NEGLECT IN THE FIRST DEGREE, a felony, in  
violation of Title 11, Section 0634(a)(1) of the Delaware Code of 1974, as amended.

KRISTIE L HAAS, between on or about the 1st day of June, 2019, and on or about  
the 13th day of September, 2019, in the County of Kent, State of Delaware, did recklessly  
cause the death of Emma Cole, a child, through an act of abuse or neglect of such child.

COUNT 2 K21-\_\_\_\_\_ (KHAAS)

MURDER BY ABUSE OR NEGLECT IN THE FIRST DEGREE, a felony, in  
violation of Title 11, Section 0634(a)(2) of the Delaware Code of 1974, as amended.

KRISTIE L HAAS, between on or about the 1st day of June, 2019, and on or about  
the 13th day of September, 2019, in the County of Kent, State of Delaware, did recklessly  
cause the death of Emma Cole, a child, having engaged in a previous pattern of abuse  
or neglect of such child.

COUNT 3

K20-11-0625 (KHAAS)  
K21-04-0317 (BHAAS)

CHILD ABUSE FIRST DEGREE, a felony, in violation of Title 11, Section 1103B(1) of the Delaware Code of the Delaware Code of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2018, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, did recklessly cause serious physical injury to a child, Emma Cole, through an act of neglect of such child: to wit, having responsibility for the care, custody, and/or control of the child, did fail to provide necessary care with regard to food necessary for the child's physical health or safety and general well-being.

COUNT 4

K20-11-0626 (KHAAS)  
K21-04-0318 (BHAAS)

ENDANGERING THE WELFARE OF A CHILD, a felony, in violation of Title 11, Section 1102(a)(1)(a) of the Delaware Code of the Delaware Code of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2018, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person who had assumed responsibility for the care or supervision of Emma Cole, a child less than eighteen years old, did recklessly act in a manner likely to be injurious to the physical, mental or moral welfare of said child, and the child's death occurred while her welfare was endangered: to wit: the defendants did engage in the torture or maltreatment of the child.

COUNT 5

K20-11-0627 (KHAAS)

K21- 04-0319 (BHAAS)

ENDANGERING THE WELFARE OF A CHILD, a felony, in violation of Title 11, Section 1102(a)(1)(b) of the Delaware Code of the Delaware Code of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2018, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person who had assumed responsibility for the care or supervision of Emma Cole, a child less than eighteen years old, did recklessly fail to do any act with the result that the child became a neglected child, and the child's death occurred while her welfare was endangered, to wit: having responsibility for the care, custody, and/or control of the child, the defendants did fail to provide necessary care with regard to food necessary for the child's physical health or safety and general well-being.

COUNT 6

K20-11-0519 (BHAAS)

K20-11-0521 (KHAAS)

ENDANGERING THE WELFARE OF A CHILD, a felony, in violation of Title 11, Section 1102(a)(1)(b) of the Delaware Code of the Delaware Code of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2018, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person who had assumed responsibility for the care or supervision of Emma Cole, a child less than eighteen years old, did recklessly fail to do any act with the result that the child became a neglected child, and the child's death occurred while her welfare was endangered, to wit: having responsibility for the care, custody, and/or control of the child, the defendants did fail to provide necessary care with regard to medical care necessary for the child's physical health or safety and general well-being.

COUNT 7

K20-11-0628 (KHAAS)

ASSAULT SECOND DEGREE, a felony, in violation of Title 11, Section 0612(a)(11) of the Delaware Code of the Delaware Code of 1974 as amended.

KRISTIE L HAAS, between on or about the 1st day of January, 2018, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being eighteen years of age or older, did recklessly and without justification cause physical injury to a child, Emma Cole, who had not yet reached the age of six years old, to wit: the defendant did bruise the child's face.

COUNT 8

K21-04-0320 (BHAAS)  
K20-11-0629 (KHAAS)

ENDANGERING THE WELFARE OF A CHILD, a misdemeanor, in violation of Title 11, Section 1102(a)(1)(a) of the Delaware Code, of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person legally charged with the care or custody of Madison Epeards, a child less than eighteen years old, did recklessly act in a manner likely to be injurious to the physical, mental, or moral welfare of said child.

COUNT 9

K21-04-0321 (BHAAS)  
K20-11-0630 (KHAAS)

ENDANGERING THE WELFARE OF A CHILD, a misdemeanor, in violation of Title 11, Section 1102(a)(1)(a) of the Delaware Code, of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person legally charged with the care or custody of Abigail Epeards, a child less than eighteen years old, did recklessly act in a manner likely to be injurious to the physical, mental, or moral welfare of said child.

COUNT 10

K21-04-0322 (BHAAS)  
K20-11-0631 (KHAAS)

ENDANGERING THE WELFARE OF A CHILD, a misdemeanor, in violation of Title 11, Section 1102(a)(1)(a) of the Delaware Code, of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of January, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, being a parent, guardian, or any other person legally charged with the care or custody of Gabriel Cole, a child less than eighteen years old, did recklessly act in a manner likely to be injurious to the physical, mental, or moral welfare of said child.

COUNT 11

K21-04-0323 (BHAAS)  
K20-11-0632 (KHAAS)

HINDERING PROSECUTION, a felony, in violation of Title 11, Section 1244 of the Delaware Code, of 1974 as amended.

BRANDON L HAAS and KRISTIE L HAAS, between on or about the 1st day of June, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, did suppress, by an act of concealment or destruction, physical evidence which might aid in the lodging of a criminal charge against Kristie L. Haas, with intent to prevent, hinder, or delay the lodging of a criminal charge against Kristie L. Haas, whom they knew had committed acts constituting a felony.

COUNT 12

K21-04-0633 (KHAAS)

ABUSING A CORPSE, a misdemeanor, in violation of Title 11, Section 1332 of the Delaware Code, of 1974 as amended.

KRISTIE L HAAS, between on or about the 1st day of June, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, did except as authorized by law, treat a corpse in a way that a reasonable person knows would outrage ordinary family sensibilities.

COUNT 13

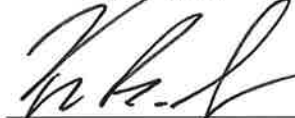
K21-04-0634 (KHAAS)

RECKLESS BURNING, a misdemeanor, in violation of Title 11, Section 0804(a) of the Delaware Code, of 1974 as amended.

KRISTIE L HAAS, between on or about the 1st day of June, 2019, and on or about the 13th day of September, 2019, in the County of Kent, State of Delaware, did intentionally start a fire thereby recklessly placing real property of another in danger of damage.

A TRUE BILL

Kathleen Jennings  
ATTORNEY GENERAL

  
DEPUTY ATTORNEY GENERAL  
KEVIN B. SMITH  
KATHLEEN A DICKERSON  
ALICIA A PORTER

\_\_\_\_\_  
(FOREPERSON)

\_\_\_\_\_  
(SECRETARY)