

Declaration of A.O.

I, A.O., hereby state that the facts set forth below are true and correct to the best of my knowledge, information, and belief. I provided the information below in response to a standard set of questions read to me over the telephone by Annie Ruhnke, Youth Sentencing & Reentry Project Mitigation Specialist on March 30, 2020. At the conclusion of the conversation, my responses to the questions were repeated to me, and I confirmed their accuracy.

1. My name is A.O. I am a resident of Delaware County, PA.
2. I am currently incarcerated at the George W. Hill Correctional Facility (hereinafter “George W. Hill”), an adult jail in Glen Mills, PA, where I have been since December 2019.
3. I am 17 years old.
4. I am not currently taking any medication at this time.
5. During my time at George W. Hill, I have gained firsthand knowledge of the facility’s Juvenile Unit.
6. Without significant population reduction, it would be nearly impossible to practice social distancing, as recommended by the Center for Disease Control, given my below observations of the physical structure of the facility and it’s common practices.
7. George W. Hill is a facility designed for adults, but there is a separate unit for youth being charged as adults. Our unit is called SMU-A and it is split into two sections: ”max” and “general population.” There are 2 floors within the unit and each floor has one type of population. “Max,” where I am housed, is on the first floor and “general population” is on the second.

8. There are 8 cells on each floor and there are currently 12 youth on the unit, including me. We each have our own cell right now, but if the population were to rise above 16 we have been told that staff would bring in “boats,” which are mattresses placed on the floor, to accommodate additional youth. The population of the unit has been increasing since the beginning of the COVID-19 pandemic, with four new young people arriving during the last few weeks.
9. The cells are approximately 4 feet wide and 7 feet long. Our beds consist of a piece of metal attached to the wall with a mattress on top. In the cell there is one sink and one toilet. The sink has running water, but it does not run by itself, you have to hold down a button to keep it on, making proper handwashing challenging. The jail provides each prisoner with a bar of soap. The jail does not provide us with any hand sanitizer or cleaning products. There has been no discussion of a need to wash hands or otherwise take safety precautions related to COVID-19.
10. We remain in our cells all day, other than when we are allowed out for recreational time in the common space on our unit. The common space is in the hallway, at one end of the unit. While the common space is 8 feet wide, there is a line approximately 1 ½ to 2 feet from the cell doors that we are not allowed to cross once we are out of our cells for recreational time. This shortens the width of usable space to only about 6 feet, making it impossible to be 6 feet apart from others in the common area. Additionally, there is an outdoor area that we are able to access during our recreational time. That area is approximately 20 feet by 20 feet.
11. We are allowed out for recreation for one hour. Prior to the COVID-19 outbreak, the corrections officers would allow us to stay out for longer, but have since limited the time

to an hour. Those classified as “max” must go out for rec separately from those classified as “general population.” Currently, 5 boys, including me, go out for recreation together. With 3 staff members also present, it is nearly impossible to practice the social distancing recommended by the CDC in the limited space provided.

12. Our unit has 2 showers, one on each floor. However, everyone uses the downstairs shower as the one upstairs has no space to put clothes so they stay dry. I do not feel the showers are sufficiently clean, so I use my own cleaning products to clean the shower before each time I use it.
13. We typically eat our meals on a tray that is given to us in our cells. This has not changed since COVID-19. On occasion, if our tray happens to arrive while we are at recreation, we are able to eat in the common area. The common area has 4 small, round tables, each with 4 seats. The tables are less than 6 feet apart from one another, as are the seats at each table.
14. I am the one who is responsible for cleaning the juvenile unit. I clean the unit once a day. After the beginning of COVID-19 there was a brief period where the units were being cleaned after each recreation time, but that only lasted for 2 days. I am occasionally given gloves, but only when I ask for them and sometimes not at all. I have asked multiple times for a mask to wear. I was told by the corrections officers that they were not allowed to give them to us, and told by the nurse that they did not have any they could spare.
15. Prior to COVID-19, school consisted of teachers coming to the outside of our cell doors and sliding worksheets for us to complete underneath them. We have not had any teachers come or been given any work for nearly a month. I miss doing my school work. It made me feel like I was doing something productive.

16. Since COVID-19, all visits with our families have been canceled. We are still allowed to make phone calls during recreational time but I do not use the phone very much. I wipe the phone down before I use it but there has been no guidance or instruction from staff to do so. The jail has been going on lockdown often since COVID-19. It is hard to know when you will get a chance to make another phone call. Sometimes we will be locked down for 1 to 2 days at a time. When we are locked down, we cannot come out of our cells at all, including to use the phone.
17. There was a staff member here that tested positive for COVID-19. Three of the youth on our unit were exposed to him. The three of them were quarantined, but just on the unit. Being “quarantined” meant only that they were let out for recreation at a separate time from everyone else. They were still using the same phone and common spaces as we were. They were recently allowed to come out with us again after not showing symptoms. To my knowledge, they were not tested for COVID-19.
18. We have received no guidance or instruction from staff on COVID-19. No one has spoken to us about what it is exactly, or what we should be doing to protect ourselves and others. I get all of the information I have from the news because I have my own television in my cell, which I purchased through the jail’s commissary. There was a television on our unit, but it broke a few weeks ago and it has not been replaced. I’m not sure how the other boys on my unit are staying informed.
19. I am focused on not catching COVID-19. I clean my cell every day with cleaning supplies I acquired on my own, and wash my hands frequently for a minute to a minute and a half at a time. I try to keep my distance from staff and other kids but it is difficult with the size of the unit and our close proximity to one another. I do not know what they

are going to do if more kids are arrested and placed in our unit. They cannot go to other units since George W. Hill is an adult facility and this is the only unit designated for juveniles.

I, Annie Ruhnke, hereby state that the facts set forth above are a true and accurate representation of the facts as they were relayed to me. Further, I understand that the statements herein are subject to the penalties of 18 Pa.C.S.A. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink, appearing to read 'ARuhnke', with a long horizontal flourish extending to the right.

Annie Ruhnke, Mitigation Specialist
Youth Sentencing & Reentry Project
Dated: March 30, 2020