

Declaration of C.Z.

I, C.Z., 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 questioning over the telephone by Annie Ruhnke, Youth Sentencing & Reentry Project Mitigation Specialist on March 26, 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 C.Z. I am a resident of Philadelphia County, PA.
2. I am currently incarcerated at the Juvenile Justice Services Center (JJSC) and have been at JJSC for eight months. Before I was transferred to JJSC on an Act 96 petition, I was in custody at Riverside Correctional Facility on State Road.
3. During my time at JJSC, I have gained firsthand knowledge of the facility.
4. Without a significant population reduction in the JJSC, it would be extremely difficult to practice social distancing, as recommended by the Center for Disease Control, given my below observations about the physical structure of the facility.
5. The facility consists of twelve units. Each unit contains ten rooms and houses up to twelve people: two of the rooms have double huts, or two single beds. These beds are spread about ten feet apart. There are currently eight girls in my unit. All of us sleep in our own rooms.
6. There are toilets and sinks in only three of the ten rooms in my unit. None of these rooms provide soap.
7. Each unit shares one day room. The day room has two toilets, two sinks with soap, and two showers. Because we all share the day room to use the toilet, wash our hands, and

shower, it is very difficult to use the day room without coming into close contact with each other.

8. I have been to the other units before. To the best of my knowledge, all units are set up in exactly the same way.
9. Before the coronavirus pandemic, everyone ate meals in the cafeteria. The eight girls in my unit occupied two tables.
10. Before the coronavirus pandemic, people exercised in the gym. The gym is the size of a normal school gym or basketball court. Two units would go at a time and exercise for one hour each day.
11. Before the coronavirus pandemic, everyone learned in the school area. The school area consists of twelve classrooms, each classroom holding one unit. We would spend one hour in a classroom, then rotate to a different classroom, staying in our unit the whole time. In total, we spent four hours in four different classrooms.
12. There is only one medical facility in the entire JJSC. From what I observed, the medical facility can fit only about ten people. The doctor is there only on weekdays. The ability to properly isolate and quarantine ill inmates at the facility is lacking.
13. The facility, on the whole, is unsanitary. Staff usually clean the different spaces once a day, but do not wear any masks, hazmat suits, or other protective gear.
14. Hand sanitizer dispensers are stationed in the hallway, but are frequently empty. No other hygiene supplies, such as masks or gloves, are available for the incarcerated.
15. Since the coronavirus pandemic, we have not been allowed to leave the unit to go to the school area, cafeteria, or gym. We eat meals and complete worksheets in our units. We no longer exercise or go outside.

16. Other than these travel restrictions, the facility is operating as normal, and we are interacting with each other as normal. No one has instructed us to practice social distancing or cautioned us to be extra careful. It is difficult for me to stay six feet away from the other girls and/or the three other staff in my unit.
17. Last week, I overheard a staff person say on her 10pm-6am shift that she had come into contact with someone potentially infected with the coronavirus, warning other staff to stay six feet away from her. That night she was at my door for two hours. Later on, she was sent home and told to self-quarantine.

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).



Annie Ruhnke, Mitigation Specialist
Youth Sentencing & Reentry Project
Dated: March 26, 2020