

### **Declaration of KL**

I, K.L., hereby state that the facts set forth below are true and correct to the best of my knowledge, information, and belief. I provided this information in response to a standard set of questions read to me over the telephone by Leola M. Hardy, Esq. on March 30, 2020.

1. My name is K.L. I am a resident of Philadelphia County, PA.
2. I am currently incarcerated at the Juvenile Justice Services Center (hereinafter “JJSC”) and have been at the JJSC since March 9, 2020.
3. I am awaiting trial on misdemeanor charges.
4. I have an underlying medical condition. I am considered medically fragile. This means that I am at greater risk if I become infected with COVID-19.
5. I was scheduled to have a detention hearing on March 17, 2020 to check on my health status but that was cancelled due to court closures.
6. I also had a hearing scheduled on March 23, 2020. My court date was cancelled and I do not have a new date.
7. I have been to the hospital once in the three weeks since I arrived at the JJSC due to my underlying medical condition.
8. During my time at JJSC, I have gained firsthand knowledge of the facility.
9. 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.
10. My unit houses 11 youth.
11. Each unit shares 1 day room. The day room has a bathroom with toilets, sinks with soap, and showers. Because we all share the bathroom to use the toilet, wash our hands, and

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

12. I have heard that another unit at the JJSC is on lockdown due to a quarantine.

13. Since the COVID-19 pandemic, we have not been allowed to leave the unit to go to the school area, cafeteria, or gym. We eat meals in our units.

14. I am only allowed to leave the unit to go to the medical unit.

15. We are no longer allowed to have visits by family, however I am allowed to make phone calls.

16. We have been told to make sure we keep clean. Social distancing was mentioned.

However it is difficult for me to stay 6 feet away from the other youth and/or staff in my unit.

I, Leola M. Hardy, Esq., attorney for K.L., hereby state that the facts set forth 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 penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in cursive script that reads "Leola M. Hardy, Esq." The signature is written in dark ink on a light-colored background.

Leola M. Hardy, Esq., Bar No. 81398  
Chief, Children & Youth Justice Unit  
Defender Association of Philadelphia

Dated: March 31, 2020