

Declaration of K.Q.

I, K.Q., 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 Michelle Mason, Esq., 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 K.Q. I am a resident of Philadelphia County, PA.
2. I am currently placed at the North Central Secure Treatment Facility (commonly known as Danville).
3. During my time at Danville, I have gained firsthand knowledge of the facility. Given my below observations about the physical structure of the facility, it is extremely difficult to follow the safety guidelines recommended by the Center for Disease Control during the COVID-19 outbreak.
4. The facility consists of 2 buildings reserved for girls with 2 units in each building. Each unit contains 12 rooms, each of which houses 1 person. There are currently 12 girls in my unit. All of us sleep in our own rooms. The individual rooms do not have toilets or sinks.
5. Each unit shares one day room. The day room has toilets, sinks with soap, and four 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. Even since the outbreak of COVID-19, we still go in pairs to access the showers.
6. I have not been to the other units, but to the best of my knowledge, all units are set up in exactly the same way.

7. Before the Coronavirus pandemic, everyone ate meals in the cafeteria. The 12 girls in my unit occupied 2 tables. We still continue to eat our meals in the same way, leaving one space between each other.
8. Before the Coronavirus pandemic, people exercised in the gym. The gym is the size of a normal school gym or basketball court. 2 units would go at a time, now we go 1 unit at a time.
9. Before the Coronavirus pandemic, everyone learned in the school area. The school area consists of 12 classrooms, each classroom holding 1 unit. We would spend 1 hour in a classroom, then rotate to a different classroom, staying in our unit the whole time. In total, we spent 4 hours in 4 different classrooms. Currently we do not receive classroom instruction but we still can sign up for computer time in the school facility for self-instruction.
10. There is only 1 medical facility at Danville. From what I observed, the medical facility is like a nurse's station. There is only 1 bed for emergency hospitalization. The doctor is there once a month. The ability to properly isolate and quarantine sick youth at the facility is lacking.
11. The facility is marginally sanitary. Staff and students usually clean the different spaces, but do not wear any masks, hazmat suits, or other protective gear. Youth are provided gloves to wear while cleaning.
12. Hand sanitizer dispensers are stationed in the hallway. No other hygiene supplies, such as masks, are available for the incarcerated.
13. Since the Coronavirus pandemic, we have not been allowed to leave the unit to go to our jobs. All vocational programming has stopped.

14. Other than a few modifications in schedule, 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, besides increasing the frequency of hand washing. It is difficult for me to stay 6 feet away from the other girls and/or the 4 staff in my unit.

I, Michelle Mason, Esquire, attorney for K.Q., 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 cursive script that reads "Michelle E. Mason". The signature is written in black ink on a light-colored, slightly textured background.

Michelle Mason, Esq. Bar ID 65378
Director, Juvenile Special Defense Division
Defender Association of Philadelphia

Dated: March 31, 2020