

Declaration of L.J.

I, L.J., 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 Emily Robb, 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 L.J. I am a resident of Philadelphia County, PA.
2. I am currently incarcerated at St. Gabriel's Hall in Audubon, PA, where I have been for approximately 6 weeks.
3. I am 18 years old.
4. I suffer from asthma, but am not on any medication at this time.
5. During my time at St. Gabriel's Hall, I have gained firsthand knowledge of the facility.
6. Without a significant population reduction at St. Gabriel's Hall, 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.
7. The facility is divided into living areas called "fraternities." The fraternity I am assigned to houses up to 16 boys, but right now there are 9 boys. The rooms each have two single beds in them approximately 5 feet apart. I share a room with 1 other boy.
8. There are no bathrooms in the sleeping units. There is 1 shared bathroom for all the boys on the unit consisting of 3 stalls, 3 urinals, 6 sinks, and 4 showers. Because we all share the same 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.
9. The units have hand sanitizer and soap.

10. Each unit shares 1 dayroom. While the area is large, when there is a unit meeting or people are watching tv, everyone sits together next to each other on couches. The dayroom arrangement and usage has not changed since the coronavirus pandemic.
11. Meals are eaten with the people on my unit, as well as two other units, on a different floor in a cafeteria. In total, approximately 45 youth, plus staff, eat together daily. The cafeteria is made up of several sections with tables of 4. The seating arrangements in the cafeteria have not changed since the coronavirus pandemic.
12. Before the coronavirus pandemic, people exercised in the gymnasium and went outside. Now, no one is allowed to go to the gym or outside. We are not exercising as a result.
13. All schooling stopped on March 23, 2020. No teachers are coming to the facility, and no online learning is being offered. I am currently not earning any credits toward my high school graduation. I asked for worksheets to complete, but was told by staff that even if I completed worksheets, I would not earn any credits. I have been told I need to graduate high school before I can be discharged from placement. Prior to the pandemic, I was told that I was on track to graduate in August 2020. Not knowing when I will graduate or be released is causing me significant stress.
14. There is 1 nurse's office at the facility. It has no beds, and if we need medical attention we stand in line outside the door. Only 3 people can fit inside the nurse's office at a time. The nurse's office is staffed by 2 nurses until 3 pm during the week, and 1 nurse on the evenings and weekends. We have access to a doctor who prescribes medication. The ability to properly isolate and quarantine sick children at the facility is lacking.

15. About a week-and-a-half ago, 2 boys on my unit were experiencing cold-like symptoms. They were not quarantined or given masks or any other special accommodations. Their daily routines were not altered.
16. A social worker was told to stop coming into work at the facility because of symptoms consistent with COVID-19. To my knowledge, no one was quarantined in response to any contact with the social worker.
17. The facility, on the whole, is unsanitary. Youth are assigned to clean the different spaces once a day, but the level of cleanliness varies, depending on staff instruction. We do not wear any masks, gloves, or other protective gear while cleaning.
18. Family visits, which are normally all scheduled on a specific day approximately twice a month, are being suspended. So far, two visits (one that should have happened on March 22, 2020, and one that was scheduled to occur on April 13, 2020) have been cancelled. Telephone calls with family members have been limited to one day per week.
19. Other than a lack of school and programming, and a suspension of family visits, the facility is operating as normal, and we are interacting with each other as normal. We have been instructed to practice social distancing but it's impossible to stay six feet away from other people because of the tight quarters.

I, Emily Robb, Esq., 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).



Emily Robb, Esq. Bar ID 201800
Supervising Attorney
Youth Sentencing & Reentry Project

Dated: March 30, 2020