

### **Declaration of TC**

I, T.C., 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 T.C. 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 being detained pending adjudicatory hearings.
4. I had court dates scheduled for March 18, 2020 and March 20, 2020. Both court dates have been cancelled and I do not have any new dates.
5. I have an underlying medical condition and I am considered medically fragile.
6. During my time at the JJSC, I have gained firsthand knowledge of the facility.
7. Without a significant population reduction at 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.
8. My unit houses 11 youth.
9. Each unit shares one day room. The day room has 1 bathroom with toilets, sinks with soap, and 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.
10. I have heard that another unit at the JJSC is on lockdown due to a quarantine which is causing me lots of stress.

11. 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 on our units.
12. We are no longer allowed to have visits by family, however I am allowed to make phone calls.
13. The staff is not keeping us informed. I heard that no one will be able to leave until everything is cleaned.
14. We have been told to make sure we wash our hands. No one has instructed us to practice social distancing. It is difficult for me to stay 6 feet away from the other youth and/or staff in my unit.
15. At night, I am locked in my cell and have nothing to do as we are not allowed paper or pencils. I try to stand at my door and look out at the TV in the day room until my legs get too tired.
16. Upon my release, I will live with my uncle in Philadelphia.

I, Leola M. Hardy, Esq., attorney for T.C. 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 blue ink that reads "Leola M. Hardy, Esq." The signature is written in a cursive style.

Leola M. Hardy, Esq., Bar ID 81398  
Chief, Children & Youth Justice Unit  
Defender Association of Philadelphia

Dated: March 31, 2020