

Declaration of T.S.

I, T.S., 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 Annie Ruhnke, Mitigation Specialist at the Youth Sentencing & Reentry Project 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 T.S. I am a resident of Philadelphia County, PA.
2. I am currently incarcerated at Youth Forestry Camp #3 in James Creek, PA, where I have been since August 2019.
3. I am 18 years old.
4. During my time at Youth Forestry Camp #3, I have gained firsthand knowledge of the facility.
5. Without a significant population reduction at Youth Forestry Camp #3, and given my below observations about the physical structure of the facility and its practices, it would be extremely difficult to practice social distancing, as recommended by the Center for Disease Control.
6. The facility is divided into two units: A Dorm and B Dorm. I reside in B Dorm, where I have been since I arrived in August 2019. There are currently 20 other kids residing in B Dorm. Each dorm is split into 2 wings where we sleep, but we share a common dayroom. There are 10 kids in my wing and 10 in the other. To the best of my knowledge, the population and set up of A Dorm is the same as in B Dorm.
7. Our dorms are an open setting; we do not have individual cells or rooms that we sleep in. We sleep in single beds in one large room. Each bed is a little more than an arm's length

away from each other, so less than 6 feet. I do not currently have someone sleeping directly next to me, but others have someone sleeping on both sides of them. While there are only 10 of us now, my wing is capable of sleeping up to 20 people.

8. Each dorm has 2 bathrooms, 1 in each wing. I share the bathroom with the others on our wing. The bathroom has 2 urinals, 2 stalls, 3 sinks, and 4 showers. There is 1 soap dispenser. Hand sanitizer has also been provided. I have seen it run out, but only 1 or 2 times.
9. All of B Dorm shares 1 dayroom. While it is a large room, there are approximately 20 of us in there at a time, not including staff. The surfaces are all shared, including our video game console and controller. I always wipe it off before and after I use it but that has not been instructed by staff. The remote control for the television is also passed around by the other residents in the dorm. While it is a big space, it is difficult to keep 6 feet away from the residents and staff because of how many of us there are. Due to my level being low, I am able to move on my own and go back to the wing to get some space if I want to. Those who have not yet earned a lower level must remain in the dayroom for most of the day.
10. We have continued to eat in the cafeteria but A Dorm and B Dorm eat separately. Prior to COVID-19, kids from both dorms worked in the cafeteria at once, but there is a rotation now so that only a resident from B Dorm is working while we are eating.
11. In addition to the cafeteria, we are still allowed to exercise in the weight room and the gymnasium. While we are told both are cleaned before and after our workouts, the weight room in particular is very small and it is impossible to keep the recommended 6-foot distance when there are 20 residents present plus staff. When we go to the gymnasium,

we are still playing basketball together. Other than the additional cleaning, our gymnasium and weight room access has remained the same since COVID-19, with the exception that we no longer play basketball with A Dorm.

12. From my observations, the medical facility at Youth Forestry Camp #3 consists of a doctor's office and a dentist's office. To my knowledge there are no beds or places to be separated if someone were to become very sick. The doctor is supposed to come to the facility once a week, but he does not come that often. Staff have told me that if there is no one on the sick call list the doctor does not come at all.
13. Before COVID-19, we had school in a classroom with the whole camp. We moved to different classes throughout the day with different teachers instructing us during each class. Directly following the outbreak of COVID-19 in Pennsylvania, and for about 2 weeks, we did not have school at all. Beginning today, we are being provided with packets of schoolwork. We are going to the school building and sitting in the classrooms to complete this work. There were 6 other students with me in the room today. Based on how the classrooms are set up and the size of the room, we are not able to sit 6 feet away from one another. Additionally, there are 3 staff members in the room with us.
14. Before COVID-19, I was on track to graduate and receive my high school diploma in the beginning of May. I was very proud that I was going to receive my diploma and now I am unsure that I will be able to do so. I'm waiting to speak to one of my teachers about how I should go about completing my senior project. The staff themselves do not seem to know and the teachers are not accessible to me.
15. The camp has not given us masks but I feel that they should and have expressed this. The staff at the facility are coming and going every day. Last week a staff member was

coughing and was sent home. His wife works at a hospital and I was told she may have contracted COVID-19. I was told by a counselor that staff are having their temperature taken every day before they enter the facility. I worry that staff may still bring in the virus and that it will spread quickly given the current conditions.

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 30, 2020