

Declaration of Z. S.-W.

I, Z.S-W, 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 Ellyn C. Sapper, Esq., on March 30 and 31, 2020. At the conclusion of the conversation, my responses to the questions were repeated to me, and I confirmed their accuracy.

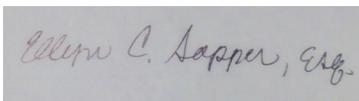
1. My name is Z.S.-W. I am a resident of Philadelphia County, PA.
2. I am currently incarcerated at Youth Forestry Camp #3 in James Creek, PA, where I have been since February of 2020.
3. I am 20 years old. I was adjudicated on misdemeanors from a 2014 bike theft. That is my only juvenile case. I have no open adult cases or convictions.
4. I do not suffer from any medical conditions.
5. During my time at Youth Forestry Camp #3, I have gained firsthand knowledge of the facility.
6. Without a significant population reduction at Youth Forestry Camp #3, 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 has two separate living areas called dorms. I am in B Dorm. The dorm has 2 wings, East and West. There are 17 kids total between the 2 wings. The other dorm is A Dorm. I have not been there but I believe it is set up the same way.
8. In each dorm wing we sleep in an open room with approximately 9 people per room. The beds are 3-4 feet apart and there are 2 rows of beds in each room. Based on the set up of the rooms, it would not be possible to be 6 feet apart from the people sleeping near you. The beds are nailed to the ground so cannot be moved.

9. There are no bathrooms or sinks in the sleeping rooms. There is 1 shared bathroom for all the boys on each wing consisting of 2 urinals, 2 toilets 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.
10. The bathrooms have soap.
11. We still use gloves when we clean the bathroom but have not been given masks. There are 1-2 residents and 1 staff member monitors when we clean the bathroom. It would be extremely difficult to maintain social distancing while we clean.
12. Each dorm shares 1 common area, which is used by youth from both wings. All 17 of us are in the room together. The room is approximately the size of a living room. There are chairs directly next to each other in rows of 5.
13. Since the COVID-19 outbreak, we spend more time together in the common space. No one has instructed us to stay 6 feet away from each other or staff. There are additional hand sanitizers on the unit and we try to clean more thoroughly.
14. The staff has not asked or instructed us to socially distance or stay 6 feet apart. The staff can practice social distancing if they choose to. I have only seen one staff use gloves or a mask and that is on his own.
15. Meals are eaten with everyone from my dorm, including both the East and the West wings. We sit approximately 3-4 feet away from each other in the cafeteria, which is in another building. There are 4 rectangular lunch tables, which are approximately 4 feet wide. This seating arrangement has not changed since the COVID-19 outbreak. The only change is that we have to wait for the cafeteria to be cleaned between dorms. We are not allowed to have contact with the youth from the other dorm in the cafeteria.

16. The cafeteria staff use gloves but are not using masks to serve food. They are 3-4 feet away from us when they hand us our food.
17. We can go to the gym once a day. It is also in a separate building. It is voluntary to use the gym. 3-6 guys usually go together, and walk together. We walk in a line close to each other about an arm's length away as required and 1 staff walks next to the line about 5 feet away. We are able to spend time outside, playing basketball and running on the track. We are not practicing social distancing while playing sports.
18. There is a separate school area that we still walk to in line arm's length apart. There are about 8 classrooms, with 6 students in each room at a time.
19. From the time the schools were closed until 3/30/20 we just stayed in our dorm without having any schoolwork.
20. On 3/30/20 we started going back to "school" 2 hours per day instead of the full school day we had before COVID-19, which was 8:30 a.m. to 3:10 p.m. with a lunch break. Both dorms had school at the same time. Now we go separately. However, there is no actual school or GED preparation. Teachers are no longer coming to the school. Instead, staff is giving us packets the teachers prepared for each of us. We have to work on them on our own with no instruction.
21. I am working toward obtaining my GED, as the Judge ordered I can be discharged from placement only when I obtain my GED or diploma. I have taken and passed one section, but since the COVID-19 school shutdown, I am on hold. I am concerned that not being able to study for and take the GED will lengthen my incarceration.
22. Since the COVID-19 outbreak, no trade or vocational instruction is happening, as those programs are taught by teachers who are no longer coming to the facility.

23. I saw the medical facility when I went for intake. The medical facility for Youth Forestry Camp #3 consists of a nurse's office, a medical exam room with one bed and an intake space. Only one person at a time is allowed in the nurse's office. There is space for maybe 5 people to go to the building at one time. There is also a dental room with a dental chair.
24. No family visits are being allowed at this time. I was told I would be able to Skype with my family on a more frequent basis than the once-a-month practice before COVID-19.
25. Other than a lack of school and vocational instruction, separation from the other dorm, and a suspension of family visits, the facility is operating as normal, and we are interacting with each other as normal.
26. Upon my release, I will return to my mother's home in Philadelphia. I will quarantine myself and continue working on obtaining my GED. I will have access to food and adequate medical care, and plan to return to my job in food preparation.

I, Ellyn C. Sapper, Esquire, attorney for Z. S-W, 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).



Ellyn C. Sapper, Esq. [Bar ID 49784]

Dated: March 31, 2020