

Declaration of [REDACTED]

I, [REDACTED], declare the following to be true to the best of my knowledge:

- 1) I am seventeen (17) years old and am making this declaration of my own free will. Everything in this declaration is based on my personal knowledge.
- 2) I normally reside in Iberia Parish, Louisiana with my mother, Molly Smith, and my siblings.
- 3) I am currently in the custody of the State of Louisiana's Office of Juvenile Justice ("OJJ") as the result of delinquency dispositions in juvenile court.
- 4) I have been in OJJ custody since on or about May of 2021. My Full-Term date for release is on or about November of 2024.
- 5) I have been placed at Bridge City Center for Youth ("BCCY") since on or about June of 2022.
- 6) I attend Riverside Alternative School at BCCY and am in the ninth grade. I have school every week day from 8am to 10am and again from 12pm to 3:20 pm. I go to different classrooms with different teachers for each subject. I take social studies, math, English, and science.
- 7) I have had a 504 plan for a learning disability in math since I was in the fourth grade. I get accommodations like a calculator and read-aloud through my 504 plan. At Riverside Alternative in BCCY, there is another teacher in the classroom, whom I believe is a special education teacher, in addition to the regular

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- teacher. The extra teacher does my read-aloud for me
- 8.) My favorite subject is math. We get homework to do every night in the dorm. We have school year round except for two (2) weeks off during the summer.
 - 9.) The school has a library, and we are allowed to check out books to take back to the Dorm. My favorite books are novels about sports and life in the city. Right now, I am reading a book called Boys in Time that I like.
 - 10.) My goal is to get my GED/Hi-Set and become a welder as an adult.
 - 11.) I was diagnosed with PTSD after I came to OJJ. I am prescribed Novinal for my PTSD to help with my nightmares. I was previously prescribed Zoloft, but it was replaced because it wasn't working.
 - 12.) I also am prescribed Prozoason because I have trouble sleeping at night.
 - 13.) I am in the LAMOD program at BCCY. I am not in the "JUMP" program because I have not been adjudicated of any sex offenses. I was assigned to Liberty Dorm until recently but was moved to Faith dorm yesterday (August 17, 2022).
 - 14.) As part of the LAMOD program, I receive group counseling three days a week (Monday, Tuesday, and Thursday) for one hour each session. We discuss coping, anger management, and asking for help

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- 15.) I also have individual sessions with a counselor once a week on Mondays or Wednesdays. The sessions last thirty (30) minutes to an hour depending on how much we have to discuss.
- 16.) I also see Mr. Laborde, a social worker, every two (2) weeks for my mental health issues. We also discuss coping skills and anger management.
- 17.) I talk to my mother every day on the phone at BCCY for fifteen (15) minutes. It is the part of the day I look forward to the most. She is the only one that really listens to me and the person I trust the most along with my siblings.
- 18.) Once every two week I am able to see my mother and siblings on a Zoom video call for 15 minutes. Talking to my mother and seeing her and my siblings motivates me to do what I need to do to go home.
- 19.) I first learned that the other youth at BCCY and I would be moved to Angola from the television news after an escape by other youth. BCCY employees first told us the move to Angola would happen in a week or two (2). BCCY employees later told me we would be moved to Angola on August 15th or 16th of this year. When the move did not happen, I was simply told by BCCY employees it could happen any day now.
- 20.) I am terrified of being moved to Angola. I do not believe I have done anything to deserve

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that.

- 21) Ever since I learned we were going to be moved, my sleeping troubles have gotten worse. I would be awake at night and start pulling on my hair until it came out. Yesterday, my dorm leader gave me a blue stress ball to use at night. It helped me not to pull my hair out, but it did not help me go to sleep.
- 22) The other youth in Liberty and Faith dorms are also terrified of being moved to Angola. I have seen youth break down and shed tears because of the prospect of being moved to Angola. We talk about the move a lot.
- 23) I am worried about not being able to talk to my mom as frequently or at all if I am moved to Angola. I am worried also I will lose access to school books for recreational reading at Angola. I do not believe we will have access to the same level of treatment, programs, and counseling at Angola and that this will negatively affect my rehabilitation. Things have gotten worse at BCCY and DTJ since D.O.C. guards were brought in. They ~~taze~~ ^{mace} us for no reason, and I am scared there will be more of this type of treatment at Angola. It stresses me to think that they will not be able to keep us separated from the adults incarcerated at Angola or that they will lock us up all day

in the small, individual cells I saw on the T.V. news that they have at Angola.

On this, the 18th day of August of 2022, I declare under penalty of perjury pursuant to 28 U.S.C.A § 1746 that the foregoing declaration above is true and correct.

[REDACTED]