

Declaration of **REDACTED**

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

- 1) I am sixteen (16) years old, and I am making this declaration of my own free will, and everything in this declaration is based on my personal knowledge. For this lawsuit, I am going by the name "Charles C." to protect my privacy because I am only 16.
- 2) My home is in New Orleans, where I grew up with my mother, Kenione Rogers, and my stepdad and five sisters. My mother has raised me, and I lived with my mother until 2020 when I was brought to the Bridge City Center for Youth ("BCCY"). Before then, I also spent time in group homes.
- 3) I am currently in the custody of OJJ as the result of delinquency proceedings.
- 4) I have been in OJJ custody at the Acadiana Center for Youth at St. Martinville ("St. Martinville") since on or about July 2022. I am assigned to Charlie pod. Before being in St. Martinville, I was in multiple juvenile facilities for temporary periods of time. Before I was transferred to St. Martinville in July 2022, I was in Alabama for about three weeks. Before that, I was in Swanson for two months, before that at BCCY, before that at St. Martinville, before that at Swanson, before that at BCCY, and before that at the Acadiana Center for Youth in Bunkie in February 2020, and before that at BCCY. In the past, I have picked up charges for escaping from the facility I was in.
- 5) At St. Martinville, I have thirty minutes of school five days a week and individual counseling once a week for about thirty minutes. I can come out of my room 6am to 6pm each day. I am supposed to be in the LAMOD program, and am not in the JUMP program. For the past three-and-a-half months since I've been at St. Martinville, I haven't caught any tickets.

- 6) I have been diagnosed with ADHD, bipolar disorder, schizophrenia, and PTSD. When I was around 10 years old, I was diagnosed by a doctor with ADHD, bipolar disorder, and schizophrenia when I was in a mental hospital for a couple of months. After I was shot when I was 13 years old, I was diagnosed with PTSD by a doctor at a group home. I have taken medication for my mental health conditions. The main medication I have been taking is Seroquel. I stopped taking it this past Friday because I was told it was making me pre-diabetic. I have not been provided a replacement medicine. In the past, I have also taken Adderall, Risperdal, Clonidine, Wafazine, and Remeron to treat my mental health conditions.
- 7) Before I was in OJJ custody, I had spent time in mental health hospitals in 2016, 2017, and 2018, for about a week each time. I was transported to the mental health hospital from school or from the facility or group home I was in because I was having a mental health crisis.
- 8) I attend school at St. Martinville. I am in tenth grade. We go to school five days a week in person, each day for about thirty minutes. I believe I am earning high school credits in my classes at St. Martinville.
- 9) I learned about the plan to move youth to Angola a couple of months ago from staff at St. Martinville. Back in July 2022, staff starting telling me that I've been behaving good, but if I go back to behaving badly, they will send me to Angola. The staff at St. Martinville has been telling me the same thing since then, including as recently as three weeks ago. Another kid at St. Martinville also told me that he heard we both were on the list to go to Angola. This was two days before I think he was sent to Angola last week. I've talked with my mom about the move to Angola, and she is also worried I might be sent there.
- 10) I am worried and have been feeling scared and anxious about being sent to Angola. I have also been having trouble sleeping because of this. I have heard about Angola and I know that it is

an adult prison. I've heard that the food there is bad and that there is a tactical team there, and heard we'll be living on the old death row where people died. I'm also concerned about being locked in a cell most of the time if I am moved there. I have also heard other kids say they don't want to be moved there because they don't want to be locked in the cells there. Since I have been here, staff have been using the move to Angola against me and other kids, threatening us that if we do something wrong, they'll send us to Angola. I hear staff say that all the time. It is no place for kids like me, and I feel I shouldn't be there. I do not believe I have done anything that makes me deserving of being put in Angola. My friends in my dorm and at St. Martinville are also scared about being moved to Angola.

I declare under penalty of perjury under the laws of the United States that that the foregoing declaration is true and correct.

Executed on the 25th day of October, 2022, in Jefferson Parish, Louisiana.

REDACTED

REDACTED

CERTIFICATE OF AFFIRMATION

I, Aditi Shah, certify that on October 24, 2022, I transcribed the foregoing based on statements **REDACTED** made and reviewed this declaration with him over video teleconferencing.

/S/ Aditi Shah
Aditi Shah
American Civil Liberties Union
(ACLU) Foundation
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I, Hector Linares, certify that on October 25, 2022, I visited **REDACTED** in person and reviewed the foregoing with **REDACTED**, and obtained his signature after he affirmed that the foregoing is true and correct under penalty of perjury of the laws of the United States.

/S/ Hector Linares
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