



1 the truck and throw the carcasses onto the bone yard. If they were able to do this without  
2 throwing up they were given a soda. Children came back covered in blood and dirt. Most of the  
3 time there was not enough staff to take these children to shower so they had to stay in their blood-  
4 covered clothing for hours until they took their shower at bedtime.

5 9. Some staff members made children sit in manure as punishment. If they refused to sit  
6 in the manure the staff physically tried to get them to sit down. If they would not cooperate staff  
7 was instructed to restrain them at that point. During restraints children were thrown to the ground,  
8 in the manure, at times with their faces in the manure. The children talked about the restraints and  
9 showed staff the manure all over their bodies. There was usually not enough staff to take the  
10 children to shower so they would have to wait to shower until the evening, often with manure on  
11 their bodies and clothing for hours.

12 10. As another form of punishment, Wayne Winder made children run with him to Red  
13 Mountain with a "third," another staff member.

14 11. When staff tried everything to get children to behave and nothing worked they were  
15 instructed to make the children sit outside on a log, on the ground, or on a milk crate for  
16 sometimes 2-3 days from about 6 a.m. to 10 p.m. The only time they are allowed to get up is to  
17 use the bathroom. Their food is brought to them. During the summer temperatures reached in the  
18 high 90's. Children sat in direct sun with no shade and were given sunscreen only if the child  
19 thought to ask for it, which was rare. The children developed sunburns on many occasions.  
20 During the winter temperatures reached well below freezing. Children were asked to put on warm  
21 clothing that was supplied by their parents. If they did not have warm clothing they tried to  
22 borrow from other children. Sometimes they would refuse to put on gloves, a jacket, boots, etc.,  
23 so we were instructed to send them outside the way they were. When they behaved for a while we  
24 could bring warm clothing to them. If they misbehaved while they were outside we were told to  
25 remove an article of warm clothing each time they misbehaved, down to their shirts, pants, and  
26 shoes. They could earn them back by good behavior.

27 12. If children misbehaved at night they were forced to sit on the porch no matter how  
28 cold it was. We were instructed to stand and watch the children from the door as the children  
GENERAL AFFIDAVIT OF BRITTANEY PAINTER - 2

1 were freezing and shivering. One child, \_\_\_\_\_ said had no feeling in her feet or hands and  
2 would walk out in the snow in bare feet.

3 13. "Adapt" is for children who act out and need to be removed from the group. They are  
4 then made to either shovel snow, shovel manure, or other forms of manual labor, until they stop  
5 their bad behavior. I think it only made things worse instead of making things better.

6 14. "Intervention" is for children who try to run away and who need to be watched  
7 constantly. The children in intervention are taken to a basement with one or more staff members.  
8 They mostly do school work while they are in intervention. This does not occur often.

9 15. "Orange" is for children who attempt suicide or who attempt to cut themselves, who  
10 are a risk to themselves or others, or who are a runaway risk. They wear a bright orange sweat  
11 suit and their other clothing is taken away. They are allowed one orange sweat suit, two pairs of  
12 socks, two pairs of undergarments, and personal hygiene products such as toothbrush, toothpaste,  
13 and shampoo.

14 16. The dorms were stark and not child-like. They had identical comforters on the beds  
15 and children were not allowed to decorate with personal belongings. Lower-level children slept in  
16 the same room as upper-level children. Few upper-level children were allowed items like a  
17 calendar on the wall. Low-level bunkies had upper-level bunk leaders who were supposed to help  
18 them learn how to "work the program."

19 17. Children were told they were there to work on their issues and problems. Children as  
20 young as 7 had no dolls, no stuffed animals (only very few upper-level children had stuffed  
21 animals, and they were limited to two), no toys, no outdoor play equipment, no bicycles, nothing.  
22 There were several games but children were rarely allowed to play with them. They had virtually  
23 no fun activities for the children.

24 18. Wayne Winder made children sit in the bathroom in his office. They had to sit on the  
25 toilet and do their school work on the counter next to the toilet.

26 19. Children appeared miserable at Majestic Ranch. For fun upper-level children (and  
27 there were not many) were allowed to go to church. Sometimes, during the summer those children  
28 were allowed to ride the horses once a week. As a privilege they were given work detail such as

1 painting the owner's cabin, etc. It was considered a privilege because they were allowed to eat  
2 normal food like pizza after they worked. There was nothing fun for lower-level children except  
3 to watch a movie once in a while. Some staff tried to make things fun for the children but it was  
4 not part of the program, just something we did on our own because we felt sorry for the children.

5 20. Two girls, \_\_\_\_\_ got out of bed several times one night. Afraid they would  
6 run away, I took away their shoes and extra clothing and told them to get back to bed. I laid down  
7 when I thought they had gone to sleep. I got back up a little while later to check on them and they  
8 were gone. They had climbed out a small window. They stole Dan Peart's truck, drove to  
9 Woodruff and got caught. The Pearts' told everyone to keep it quiet. Wayne Winder told  
10 everyone that \_\_\_\_\_, was sent to Tranquility Bay in Jamaica, another WWASP facility (he  
11 threatened to send children who misbehaved to Jamaica where, he said, they have no child abuse  
12 laws,) and that \_\_\_\_\_ was moved to Cross Creek, again another WWASP facility. If any child is  
13 caught discussing the situation they suffer consequences.

14 21. Children had access to silverware. Sharp knives were locked up in a safe but I  
15 remember one time when one was left in a small cupboard. Michelle, who was one of the  
16 supervisors, put the knife away. Because children clean the kitchen they could have gotten access  
17 to that knife and done serious damage to themselves or others.

18 **CHILDRENS' PSYCHOLOGICAL ISSUES AND LACK OF TREATMENT**

19 22. Not only was I not told about problems children had when they came into the  
20 program, but I was not trained to deal with them.

21 23. Some of the conditions that I know children suffered from include: (1) bi-polar; (2)  
22 suicidal; (3) extreme depression; (4) killing animals; (5) ADD/ADHD; (6) run-aways; (7) drug  
23 addicts as young as 11 years old; (8) sexual abuse, molestation, and rape; (9) children with bed-  
24 wetting issues, usually as a result of sexual abuse; (10) self-mutilation; (11) alcohol syndrome;  
25 and (12) mentally challenged. I was in no way trained to deal with these serious issues.

26 24. \_\_\_\_\_ came to the program with anger issues and did not get therapy for those  
27 issues. She was restrained often and almost always was injured as a result of the restraints,  
28 leaving wounds and bruises on her body.

1 25. \_\_\_\_\_ was sexually abused, molested, and raped by her mother's boyfriend and other  
2 family members. She had problems with cutting and was found bleeding with cuts all over her  
3 arms and legs on many occasions. She tried killing herself by drinking bleach and water. We  
4 watched her all night and told Michelle who told upper authorities but nothing was done.  
5 left Majestic Ranch a few weeks ago.

6 26. \_\_\_\_\_ Girls were homesick and would wake up crying in the night. Some had night terrors.  
7 \_\_\_\_\_ thought someone was after her and had nightmares. Her brother, \_\_\_\_\_, and her cousin  
8 \_\_\_\_\_ were all at the facility. She was not allowed to look at or talk to her brother but did have some  
9 interaction with her cousin because they were in the same dorm. The three of them finally went  
10 home.

11 27. \_\_\_\_\_ Therapy was provided only to those who paid an additional fee for the children to go  
12 to see an outside therapist. Out of all the children 6 or 7 went to therapy every week or two.

13 28. \_\_\_\_\_ arrived to Majestic Ranch spitting up blood. I asked other staff and supervisors  
14 to take her to the doctor. She finally was taken to the doctor and it was determined she was  
15 cutting the back of her throat which was causing her to bleed. She did not know how to write or  
16 read and she had night terrors. \_\_\_\_\_ parents would not allow her to get therapy until she  
17 reached the higher levels, though she desperately needed it.

18 29. \_\_\_\_\_ stole a lighter and gathered paper. They stuffed the paper behind  
19 the dryer. Their goal was to blow up the facility by pouring bleach on the paper and lighting it on  
20 fire near the dryer. They had access to the paper, the lighter, and the bleach. Luckily I found the  
21 papers and lighter and was able to stop them from doing it. Rather than seek treatment for these  
22 girls, the directors put them in "orange." The only possessions they had for weeks were an orange  
23 sweat suit, items for personal hygiene such as toothbrush, toothpaste, shampoo, and were given  
24 only two pairs of socks and two pairs of under garments.

25 **LACK OF PROPER MEDICAL TREATMENT FOR THE CHILDREN**

26 30. \_\_\_\_\_ I and other staff told Director Tammy Johnson one of the girls had a bad rash with  
27 huge sores on her legs, arms, and buttocks. Tammy diagnosed the rash as eczema without taking  
28

1 her to the doctor. After repeated complaints from staff she was finally taken to a doctor where she  
2 was diagnosed with scabies. Three girls came down with them, maybe more since I left.

3 31. On many occasions children were hurt or sick and they did not receive immediate, if  
4 any, medical treatment for their conditions.

5 32. There was no on-site nurse to administer drugs or to monitor the children's health.  
6 There was no other on-site medical staff or psychiatric staff. Supervisors distributed medications.  
7 If the supervisor was busy then any other staff could distribute the medications to the children.  
8 There were medications such as Zoloft, birth control pills, Lexapro, sleeping medications, and  
9 more.

#### 10 **UNSAFE AND UNSANITARY LIVING CONDITIONS**

11 33. Thirteen or more girls are forced to share one bathroom. There was not enough hot  
12 water for all of the girls to shower so many showered in cold water, even during the winter  
13 months when temperatures fell well below freezing. Sometimes there was no running water at all  
14 in the girls' dorm and they had to go to other dorms to shower.

15 34. When I first started working there the girls lived in a decent dorm. When they decided  
16 to put all of the boys in one location, all of the girls were moved to a stinky basement. After two  
17 girls tried to run away they nailed or screwed the windows shut. It would have been nearly  
18 impossible for the girls or the staff members to get away in the event of a fire. They finally  
19 bought a used mobile home and the girls moved in there. The windows were nailed or screwed  
20 shut again. The shower backed up on occasion and when the staff attempted to plunge the drain  
21 human feces came up the drain and into the shower. Students were made to clean it with Clorox.

22 35. Girls were beginning to menstruate and did not have what they needed and were not  
23 taught how to clean themselves. They left used menstrual pads on the floor.

#### 24 **CHILD LABOR VIOLATIONS**

25 36. Children are forced to do their own laundry (there was only one washer and dryer in  
26 the girls' unit that was broken most of the time. When it was broken we used the drier in Wayne's  
27 office. Because of this girls sometimes did not have clean clothes.)

1 37. The dishwasher was not large enough to accommodate all of the children's dirty  
2 dishes so children were forced to wash their own dishes. Children are forced to clean their own  
3 living quarters. There is no cleaning staff.

4 38. As a privilege upper level children are allowed to clean Dan Peart's personal cabin  
5 and to paint his cabin. They are given "normal" food for their work.

6 39. Children go to herd sheep on sheep trail with Peruvian men who live on the ranch as  
7 well as one staff member. They are gone for a day or two and sleep in the mountains.

8 40. I worked in the boys' unit for one day when I first got there and witnessed them  
9 having to herd sheep in the hail, rain, and mud.

10 41. If someone official came to visit the facility we and the children were made to deep-  
11 clean the facility and to make sure everything was spotless.

12 **ANIMAL ABUSE/NEGLECT**

13 42. During the sheep birthing process children witnessed guts coming out of the sheep's  
14 bodies and witnessed as the owners of the ranch stuffed them back into the sheep's bodies. Many  
15 died during the birthing process and their bodies were thrown in a pile. When staff and children  
16 complained of the terrible smell that came from the pile Dan Peart would have the children load  
17 the maggot-infested dead carcasses onto a large truck and he would drive the truck to the "bone  
18 yard." He would then have the children jump on the truck and throw the carcasses into the bone  
19 yard. If the children did not vomit they were given a soda.

20 43. Dan Peart owned sheep dogs. The children were told that if they touched the dogs they  
21 would be shot. The animals at the ranch were not well cared for. A donkey had overgrown hoofs  
22 that were curling. Large white dogs walked around with blood all over them from hunting and  
23 killing animals or from feeding off of dead carcasses.

24 **POOR FOOD QUALITY/UNSANITARY KITCHEN CONDITIONS**

25 44. The kitchen was filthy. Food was mishandled and children were fed cross-  
26 contaminated meats. When the dorms were full a child's bed was moved into the kitchen for  
27 about two weeks.

1 45. Children were given only one glass of milk per day. If they complained they were  
2 warned they would receive powdered milk instead.

3 46. The dishwasher did not work well so children had to wash their own dishes in a tub of  
4 soapy water shared by a lot of children. The dishes were not cleaned to food handler's standards  
5 because an extra rinse with Clorox was not done. The kitchen ran out of hot water before the  
6 dishes were done so they were being cleaned in cold water. The kitchen staff complained that the  
7 dishes were not properly cleaned.

8 47. Children were fed meats and poultry that were not properly refrigerated and cooked.

9 48. They were fed a lot of Cisco canned foods. They were fed mostly packaged, unhealthy  
10 foods. One cook, Linda, did try to feed the children foods that provided them with nutrients.

11 49. Another cook, Karette, and her husband did not feed the children healthy foods and  
12 often the children were hungry. Many times children were given only a sandwich and they were  
13 hungry for hours. They gave children hamburger that was still raw in the center and chicken that  
14 was not thoroughly cooked. They did not have their food handler's permit when they arrived and  
15 finally got them.

16 50. Children were given 30 minutes to eat and do their dishes.

17 51. Jenny, another cook, refused to eat in the kitchen. She told me that one time a married  
18 couple she knew were eating in the kitchen when they saw white things crawling out of the walls  
19 and the food.

20 52. There were rat droppings on silverware.

21 **LACK OF PROPER EDUCATION**

22 53. I do not believe the teachers were accredited. Children were basically home-schooled  
23 and worked at their own pace. The "teachers" and teacher's aides helped the children with their  
24 work but did no formal teaching. Just before I left they were breaking up the school day and  
25 having children rotate classes. Teachers began to do some teaching though the children were still  
26 working at their own pace.

27 54. Children are given very little help and struggle with some of their assignments. If they  
28 are not able to finish an assignment they get in trouble and are given consequences, meaning it



1 takes them that much longer to ever achieve upper-level status. Sometimes they are not given the  
2 tools to finish the project and they are punished. For example, some projects require the children  
3 to have things such as paper, magnifying glass, etc., and if they are not supplied with those and do  
4 not finish their assignment they get punished.

5 55. Children as young as seven were made to sit in school from 9:00 a.m. until 5:00 p.m.  
6 with breaks for lunch and sometimes a one-hour group session Monday through Thursday.

7 **BRAINWASHING**

8 56. engaged the children in visualization sessions where she would have them  
9 listen to music and tell them to think back about how they treated their parents and what they  
10 should have done differently. She was not trained to do this and it was disturbing to the children.

11 57. Children were told in seminars to search for their "magical child." The magical child  
12 is the innocent sweet baby you used to be. You are supposed to find the magical child in you and  
13 not be the person you had become.

14 58. I went to a meeting to learn about seminars that parents and children attend. I was told  
15 the parents were our "clients" and the children were our "products." I felt strange thinking of the  
16 children as products. I was taught about the magical child. The person performing the seminar  
17 said they wanted to see their products do well so their clients would be happy.

18 **LACK OF STAFF TRAINING/ISSUES WITH STAFF**

19 59. Staff are not properly trained. I never got any training until I had been there quite  
20 some time.

21 60. When a child entered the program, I never received information about the child's  
22 physical, medical, mental, psychological, or emotional issues and problems nor did I receive  
23 training in dealing with the many issues these children had.

24 61. Wayne Winder pulled the staff table out of the kitchen, forcing staff to have to sit with  
25 the children while they ate. Staff were stressed because they did not receive adequate breaks.  
26 Children called weekend staff "Nazis" because they were so mean.

27 62. We were short-staffed at least once a month which caused a lot of stress and pressure  
28 on staff and on the children.

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**TYPICAL DAY FOR THE CHILDREN**

63. Weekdays: Children woke up at 7:00 a.m., made their beds in 5 minutes, and did chores until it was time for breakfast at 7:30 a.m. Their meds were distributed during breakfast until the children began sharing their meds, at which time they were distributed by supervisors in Wayne Winder's office. The children typically read from 8:00 a.m. to 9:00 a.m. They were in class from 9:00 a.m. to 11:45 a.m., went to lunch, then to group for an hour on Monday through Thursday. They went back to class from 1:00 p.m. to 5:00 p.m. They ate dinner at 5:00 p.m. and were to be in their dorms at 5:30 p.m. From 5:30 p.m. to 7:00 p.m. we were supposed to meet with the children to talk about the day, but when I worked I allowed the children to have free time. If there were games available I allowed them to play. I allowed them to talk to each other because lower-level kids were not typically allowed to talk to each other. They were made to sit on their bunks from 7:00 p.m. until 9:00 p.m., reading or writing. Lower-level children were not allowed to have books except maybe the bible or a self-help book so they usually wrote letters home instead. Bedtime was at 9:00 p.m.

64. Weekends: I do not know what happened during weekends because I worked the weekday shift.

**DIRECTOR'S/OWNER'S INVOLVMENT WITH THE CHILDREN**

65. The only involvement Director Tammy Johnson had with the children was when they first entered the program or if they were in serious trouble.

66. Wayne Winder had a very bad temper and would get into arguments with the children at times.

67. At times when Wayne Winder had to run Adapt, which was not often, he got angry with the children and intimidated them. Wayne and other staff members made the children sit in manure and performed restraints that resulted in the children being covered in manure and sometimes having their faces in the manure.

68. If someone official came to visit the facility we and the children were made to deep-clean the facility and to make sure everything was spotless. We were told to remove children

1 from Adapt and to take them out of "orange"

2 69. The only involvement that Dan and Donna Peart had with the children was when the  
3 children did work detail by cleaning and painting their cabin, etc.

4 70. When owners Dan and Donna Peart came to inspect the facility staff and children  
5 were instructed to deep-clean everything.

6 WITNESS my signature this 24<sup>th</sup> day of February, 2005.

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10 BRITTANY PAINTER  
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