GENERAL AFFIDAVIT UNDER OATH OF ISABELLE ZEHNDER INITIAL CONVERSATION WITH EMPLOYEE KARLEEN FARNSWORTH

I, ISABELLE ZEHNDER, declare and state as follows:

- 1. I, ISABELLE ZEHNDER ("Declarant"), am a resident of Battle Ground, County of Clark, State of Washington, and do hereby certify, swear or affirm, and declare that I am competent to give the following declaration based on my personal knowledge, unless otherwise stated, and that the following facts and things are true and correct to the best of my knowledge.
- 2. On or about January 25, 2005, I received a telephone call suggesting I contact Karleen Farnsworth, an employee at Majestic Ranch, because Karleen had voiced concerns about abuse and neglect at the ranch.
- 3. When I called Karleen she told me she originally took the job at Majestic Ranch because she wanted to help bring children and animals together. She was very surprised when one of the girls appeared to know nothing about animals since this was supposed to be a working ranch.
- 4. She told me there had recently been a staff walk-out. Staff demands were for better food and safe drinking water for the children, better healthcare for the children, and better housing for staff. She said staff members were warned by their superiors that if they walked off their jobs they would be turned in for child abandonment.
- 5. Karleen told me she contacted Debbie Kurzban, Department of Social Services in Utah. I sent Debbie a summary of my telephone conversation with Karleen. She told me there was nothing her department could do because Majestic Ranch is not a licensed facility.

 Attached is a true and correct copy of my notes sent to Ms. Kurzban (see "Exhibit A.")
- 6. The remainder of this affidavit is an account of my conversation with Karleen and is a true and correct accounting of what she told me.

UNUSUAL TREATMENT AND PUNISHMENT/CHILD ENDAGERMENT

7. Children are being physically, mentally, and psychologically abused. They look listless and depressed.

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- 8. A boy's mother died while he was in the facility. He was not allowed to attend the funeral. It was deemed "not in his best interest." One night he did not want to come inside and was walking around the parking lot in circles. After he was asked to come in and he refused a large man restrained him by throwing him to the ground, in the snow, pulling his arms and legs back so he was in the hog-tied position, with his face in the snow, and then dropped him and left him there. Two other male staff watched the restraint. They asked Karleen to come watch because she needed to know how to do this.
- 9. Children are fed a minimum of high-carb low nutrition food. They get very few fresh fruits and vegetables. Children complain of being hungry all the time.
- 10. As punishment, children are forced to stand on top of milk crates in the middle of the yard for long periods of time in sub-freezing temperature (one day was 10 degrees.)
- 11. Children are forced to pick up maggot covered carcasses.
- 12. Boys drink shampoo in hopes of getting sick enough for their parents to withdraw them.
- Boys, mostly, are forced to work outside after dark in the freezing cold weather shoveling snow. If they don't do the work they are forced to stand on milk crates and not talk or move. Karleen witnessed children standing on milk crates for extended periods of time in subfreezing weather.
- 14. Children who refuse to shovel manure are forced to do so with their bare hands.
- 15. Suicidal children or children who have "run plans" are dressed in orange.
- 16. Girls were made to clean the owner's personal guest house located across the facility. Children are the ones who do all the cleaning at the facility. There is no cleaning staff.
- 17. An adopted girl who had been beaten and raped in a Russian orphanage had night terrors and Karleen felt staff were not trained to deal with this type of problem.
- 18. A 15 year old girl appeared to be programmed. She was allowed to perform visualization sessions with the girls. Karleen did not feel she was in any way trained to do this and felt it had a negative effect on the children.

LACK OF PROPER MEDICAL TREATMENT FOR THE CHILDREN

- 19. Some of the girls in Karleen's dorm were suffering from conditions such as abandonment, post-traumatic disorder, night terrors, and other psychological conditions. Some were by-polar, others suicidal. There was no nurse or psychologist on-site to deal with these serious conditions.
 - 20. There was an outbreak of scabies in one of the girls' dorms in September 2004. Girls were still suffering from large sores and pain when Karleen left at the end of January 2005.
 - Food and water were making the staff and children sick with vomiting and diarrhea. They suffered from intestinal pain.
- 22. Many of the girls were ill during the short time Karleen worked at the ranch. Several had the flu with vomiting and fever, one was vomiting in a garbage can.
- Another child had been complaining for a long time of knee pain but was not taken to the doctor until she came down with 104° fever. She was diagnosed with pneumonia and was given a knee brace and crutches.
- A boy's tooth fell out the first week Karleen worked there. She overheard other staff discussing it but he was not taken to a dentist. The portion of tooth that remained in his mouth was black with decay.
- One of the girls glasses broke before Karleen started working there. By the time she left the child had not been taken to the eye doctor and she did not have new eyeglasses.
- 26. Most of the girls suffer from some form of sleeping disorder. They wake up in the middle of the night screaming, crying, and fussing. Many have night terrors and nearly all of them talk in their sleep.
- 27. Many girls complain of backaches from being made to sit on the floor for extended periods of time.
- Food and water were making the children and staff sick to their stomachs with vomiting and diarrhea.

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POOR UNSANITARY AND UNSAFE LIVING CONDITIONS

- 29. There was a sewage backup and raw sewage was flowing on the property; it was frozen and not visible at the time, but could be smelled from the tap; there was a sign by one of the bathrooms asking staff not to shower as it would contribute to the leach field problem.
- 30. Girls are housed in a double-wide pre-fab trailer split into 2 "dorms," one side for younger girls, the other for older girls. One side has no smoke detector.
- 31. Windows have nails in them so they will only open about 2 inches which is a fire hazard.
- 32. Raw meat is left out all day and if concerned staff did not refrigerate it, kitchen staff would keep it out all night.
- The kitchen is below health code, dishes are not washed in a sanitary manner; rumor 33. has it a new kitchen will be installed that will be up to code; she has heard more kitchen staff should be hired so the children do not have to continue to do all the work.
- 34. Powdered milk is mixed with regular milk (kids are told milk is too expensive yet parents are paying over \$3,000 a month.)
- 35. Expired milk is given to the children.
- 36. Clothing is rationed; some girls receive only 2 pair of underwear a week if they are in "orange," meaning they are either a risk to themselves or others, they are suicidal, or they are a run-away risk.
- 37. One female staff member slept in the boys' dorm one night because they were severely understaffed. She witnessed a top bunk that fell on top of a boy on the bottom bunk. The reason she believes that happened was that staff had been instructed to loosen the screws on the beds so they would make noise when children tried to get up in the middle of the night.
- 38. Bed sheets were not cleaned for over a month.
- 39. Several girls wet their beds and there is suspicion they sleep in soiled bedding.
- 40. The bathroom door is propped open at all times so the girls have no privacy.
- 41. Tori A. Jones is the Family Rep. Her husband, Dave Jones, beat up a boy last year who, after being beaten, was sent to Jamaica. Dave Jones was not allowed to be around the AFFIDAVIT OF ISABELLE ZEHNDER RE CONVERSATION WITH KARLEEN FARNSWORTH-4

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children. Later, he was put on driving duty. He is still there as a driver but has to fill in at times 1 2 working with the children. ANIMAL ABUSE AND NEGLECT 3 42. Children and other staff told Karleen if children touched the dogs they would be 4 shot. 5 43. Ranch dogs feed on carcasses and come back with blood on their faces. 6 44. Sick animals are shot in front of the kids. 7 45. Weanlings are made to stand tied with no water access, putting them at risk of 8 strangulation, foundering, and dehydration. 9 Mature horses eat snow because water is a far distance from their feed pile. 46. 10 Bands of horses roam the property in search of food. 47. 11 48. The donkey has overgrown hooves. 12 13 WITNESS my signature this 22nd day of February, 2005. 14 15 Dalielle Johnder 16 17 18 19 20 21 22 23 24 25 26 27 28

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EXHIBIT A

Staff walk-out last week:

Demands:

- Better food and safe drinking water for children
- Better healthcare for children
- Better housing for staff

Staff were warned they would be turned in for child abandonment; most stayed, one quit Health Issues:

- Girls have scabies untreated -
- Food and water are making children and staff sick with vomiting and diarrhea; staff must bring their own food and water to avoid serious stomach problems
- Children sick with diarrhea and vomiting daily and suffer from stomach pain
- Girls sick with the flu last weekend , high fever, throwing up; was in bed sick with vomiting in the garbage can
- One boy's tooth broke because of decay; remaining portion is black and he is in pain? he has not yet seen a dentist broke 3 weeks ago
- Most of the girls suffer from sleep disorders in the Fawns dorm, ages 10-13 has night terrors screams in Russian most nights and does not sleep well;
 woke up crying, which woke up who was wining and fussing, which
 woke up , in turn woke up , then woke up and just mumbled
 a bit– they all started; sat up in the night and was talking about her underwear
- Many girls have night terrors and nearly all of them talk in their sleep
- Many girls complaint of backaches from being forced to sit on hard floors for extended periods of time
- One girl has pneumonia; finally got treated –
- Her knee hurt for over a month; she now has crutches and a brace
- There is no nurse on site
- Girl's glasses were broken a month ago not replaced yet

Child Abuse/Neglect:

- Children are being mentally abused
- Kids look depressed and listless
- Children are fed a minimum amount of poor quality, high carb food: oatmeal, toast, pbj, beans, canned soup
- No snacks for children, always hungry

- As punishment, children are forced to stand on top of milk crates in the middle of the yard for long periods of time in sub-freezing temperature (one day was 10 degrees)
- Children are forced to pick up maggot covered carcasses
- Boys drink shampoo in hopes of getting sick enough for their parents to withdraw them
- Boys, mostly, forced to work outside after dark in the freezing cold weather shoveling snow
- If they don't do the work they are forced to stand on milk crates and not talk or move
- Kids who refuse to shovel manure are forced to do so with their bare hands
- Suicidal kids or kids who have "run plans" are dressed in orange
- Girls were made to clean the owner's personal guest house located across the facility
- Adopted girl, who was beaten and raped in a Russian orphanage, has night terrors (they are not set up to deal with children like her)
- Boy mom died while he was in the facility. He was not allowed to attend the funeral. It was deemed "not in his best interest." (Again, they are not set up to deal with children with these issues.)
- was walking around the parking lot and did not want to go inside. Staff asked him to come in but he kept waking in circle. Rather than try to talk to him they called other staff members out there, including Kar, and proceeded to restrain him by throwing him to the ground, pulling his arms behind him, and pulling his legs up behind him. They counted and held him there for a short period of time and let him go. He just laid there in the snow and finally came in.

Poor Conditions:

- There is currently a sewage backup and raw sewage is flowing on the property; it is frozen and not visible, but can be smelled from the tap; she plans to take a picture of a sign by one of the bathrooms asking staff not to shower as it will contribute to the leach field problem
- Girls are housed in a double-wide pre-fab trailer split into 2 "dorms," one side for younger girls, the other for older girls
- One side has no smoke detector
- Windows have nails in them so they will only open about 2 inches fire hazard
- Raw meat is left out all day and if concerned staff did not refrigerate it, kitchen staff would keep it out all night
- The kitchen is below health code, dishes are not washed in a sanitary manner; rumor has it a new kitchen will be installed that will be up to code; she has heard more kitchen staff should be hired so the children do not have to continue to do all the work
- Powdered milk used 1/2 and 1/2 with regular milk (kids are told milk is too expensive parents are paying over \$3,000 a month)
- Expired milk is given to the children

- Clothing is rationed; some girls receive only 2 pair of underwear a week; when they complained they were dirty, they were told to turn them "inside out"
- Female staff member was forced to sleep with boys due to being understaffed. This staff member witnessed a top bunk fall onto a boy on the bottom bunk
- Bed sheets were not cleaned for over a month.
- Several girls wet their beds and there is suspicion they sleep in soiled bedding; she plans to find out more about this next week
- Bathroom door is propped open at all times; no privacy

<u>Issues re Animals:</u>

- If the children touch any of the dogs, the dogs are shot
- Ranch dogs feed on the carcasses
- Sick animals are shot in front of the kids
- Weanlings are made to stand tied with no water access, putting them at risk of strangulation, foundering, and dehydration
- Mature horses eat snow as water is a far distance from their feed pile
- Bands of horses roam the property in search of food
- Donkey has overgrown hooves

Miscellaneous:

Some ranch hands are from Peru - possibly illegals; they are sleeping in trailers that are only 100 yards from the minor boys' dorms

Tori A. Jones is the Family Rep – her husband, Dave Jone, beat up a boy last year and was put on driving duty and taken away from his parent duties. The boy was beaten and sent to Jamaica. He is still there as a driver but has to fill in at time working with the kids.

Majestic Ranch – 10 miles out of Randolph

Probably no longer there: Ronnie Gentry

Family Representative

- 15 years old – very programmed family

Does creative visualization – runs groups of kids

- 13 years old

She does not think her mother would be happy to know what is going on. Kar took her out the other day to see a horse. She was shocked to know that animals have a brain. When Kar cut an apple up for the donkey she was excited to see the donkey eat some apple.

Nice kid, never in trouble.

- 11 or 12 years old

She was in a mental hospital before she came to the ranch.

There are **bi-polar** kids who are taking medication daily older girls are on meds than the younger girls

and some others - more of the