

1 discipline or redirection would have stopped the child's negative behavior. Restraints at Majestic
2 Ranch are overused, are not performed properly, and are dangerous to the children.

3 6. All restraints that I have witnessed and performed have been done with children lying
4 on their stomachs. They are then put into the hog-tied position. Their hands are placed behind
5 their backs, wrists touching. Their legs are pulled back and must touch each other but they cannot
6 be crossed. Their legs are then pushed down towards the child's body, bent at the knees. If the
7 child resists or if the staff is in a bad mood restraints can get out of hand. I have seen pressure
8 applied to children's legs by large men sitting on the child's calves and on their backs. I have seen
9 two large men at one time sitting on a small child's body; one on his legs, another on his back. I
10 have also seen them pull their arms backwards and upwards, causing severe pain. Children who
11 are restrained in this manner cry in pain.

12 7. Most restraints lasted 5, 10, 15 minutes. I have seen adult men sit on children for that
13 long. If the child kicks or resists staff are told to continue with the restraint.

14 8. The longest restraint that I can remember was done on a 12-13 year old boy who was
15 tall but very small built. When I first started working at Majestic Ranch he was doing very well
16 and was well-behaved. But as time went on he became angry because he had reached a higher
17 level but soon realized that no matter how hard he worked it was going to get him nowhere. He
18 did not get privileges that equaled the amount of energy and work it took to reach higher levels.
19 Extreme frustration would cause him to act out. I have seen him flip out, punch things, and
20 threaten to kill people. He had lost his desire to be good and to "work the program." I saw him
21 restrained for 30-45 minutes. Two grown men sat on his back and legs the entire time. I saw
22 scrapes on his arms when they were done.

23 9. I have seen grown men, in anger, pull children's arms back until their hands were
24 touching the back of their necks, putting pressure on the child's arms during restraints. A 13-year
25 old, small-built child's shoulder was dislocated during a restraint. He was not taken to a doctor
26 for a couple of days and then was given a brace.

27 10. I have seen Wayne Winder grab children by the backs of their necks and drag them on
28 the ground.

1 11. I learned there were other ways to work with children through diverting their attention
2 but some staff members were unwilling to work with the children and would treat them harshly
3 and with disrespect. I witnessed some staff members who were mean and who performed
4 restraints on children who did not need to be restrained.

5 12. Every restraint that I saw performed at Majestic Ranch, and I have seen many, were
6 done on the floor or on the ground. I have never seen restraints done in the sitting or standing
7 position.

8 13. One boy's mother died while he was in the program, resulting in psychological
9 problems. At times he acted out, lost his temper, and antagonized staff to make them angry. Some
10 staff abused him more than once leaving bruises on his face and arms. They also pulled muscles
11 in his arms.

12 14. Children were sometimes made to shovel manure. If they refused or otherwise
13 misbehaved they were made to sit in the manure for extended periods of time until they decided
14 they would resume shoveling. On 3-4 occasions I saw children who were restrained in the
15 manure. They were either thrown to the ground or assumed the position on their own. These
16 restraints resulted in manure getting into the children's hair, face, ears, and mouths. I have seen
17 children forced to remain in that position, with grown men sitting on their legs and backs, for 5 to
18 15 minutes at a time.

19 15. I was working at Majestic Ranch when someone performed a "blanket party." The
20 boys told me that Dar Tanyon gave them permission to do a blanket party on a very small-built,
21 tiny 12-year old boy. About 6 of the boys were told to attack him. When I asked them for more
22 details they said they could not talk about it any more. If children discuss situations like this they
23 are Cat 4 or Cat 5 consequences, which is the highest consequences they can get. Children work
24 very hard to earn points and they can be taken away very quickly, and are taken away very
25 quickly often. In order for children to graduate the program they must earn points so losing points
26 is very difficult on them and causes more stress resulting in increased bad behavior. Once they
27 know they have lost their points they lose their desire to work the program.

28

1 16. One form of punishment at Majestic Ranch is Intervention/Isolation. When staff or
2 management felt a child had done something to warrant it, they were put in Intervention/Isolation.
3 It was supposed to be used for children with extreme problems such as suicide attempts, children
4 who were a danger to themselves or others, etc. I felt that on many occasions it was misused and
5 that other forms of discipline or distraction could have helped the child.

6 17. During Intervention/Isolation, children are taken to a basement with one staff member.
7 The door is locked and the staff wears a key around his neck. The children eat, shower, use the
8 bathroom, do school work, and sleep in that room the entire time they are in intervention/
9 isolation. Mattresses were placed on the floor. They have no contact with other children or staff.
10 The windows are screwed shut so they could not get out of there was a fire in the middle of the
11 night. It was basically a lock-down area. The most I saw in there at one time was 3 children. I
12 never personally worked in isolation.

13 18. Another form of discipline was called ADAPT (All Day Alternative Physical
14 Training) which was used for children who misbehaved. There were a wide range of reasons
15 children were sent to ADAPT. While they were there, they were forced to sit on crates in the
16 snow. They were sent out in the clothing they were wearing and if they were lucky they got a
17 jacket. If they were in orange (for children who are suicidal or run-away threats,) that would
18 mean a pair of shorts and a hoody. If he was lucky he might have a jacket. They made them stay
19 out there until they changed their behavior. Some children sat out there for 3 hours or more.
20 Children were sick often with colds and fevers.

21 19. While in ADAPT children were made to shovel manure, shovel snow, or perform
22 other physical manual labor to work out their anger. The length of stay in ADAPT depended on
23 what they did wrong, but the allowed amount of time was from 6:00 a.m. to 10:00 p.m. The
24 average amount of time that I saw children spend in Adapt was 2-6 hours. Children routinely
25 were restrained while they were in ADAPT.

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

27 20. I felt that many of the boys who I worked with did not need to be in a program. It
28 appeared that some of the children who were there had parents who did not want them. Some had
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1 anger problems and issues but none deserved the treatment they received at Majestic Ranch.

2 Many boys who were fine when they arrived finally snapped from the pressure, sadness, and pain.

3 21. I saw children as young as 7 and as old as 16 at Majestic Ranch.

4 22. Some children tried to commit suicide by drinking cleaners or by cutting themselves.

5 Some had ADD, some were bi-polar. Many took strong medications for their conditions.

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

7 23. The children were sick often, more than normal children.

8 24. We were given no training in disbursing strong prescription drugs. Shift leaders were
9 the ones who were supposed to distribute the medications but they were not always available to
10 do so. I have disbursed medications during those times. There was no nurse on-site.

11 25. I currently work at a facility run by the state, and we are trained to understand what a
12 medication, what it does, and what it is taken for.

13 26. When children were injured or sick they were not taken to a doctor right away. There
14 were many occasions when children never got medical attention for illnesses and injuries when
15 they should have.

16 **UNSAFE AND UNSANITARY LIVING CONDITIONS**

17 27. The windows were nailed shut in the dorms which was a fire hazard.

18 28. There was a mouse problem in the kitchen.

19 29. The sewage backed up at least once a day. Though it was frozen when I left you could
20 still smell it. Children crossed a small wooden bridge that went over the place where the sewage
21 was coming up to the ground. Sewage overflowed onto the ground daily.

22 **CHILD LABOR VIOLATIONS**

23 30. Children had to do work for owners Dan and Donna Peart. They were made to

24 (1).paint Dan and Donna's cabin, (2) clean around the Peart's houses, and do other chores.

25 Children had to do all the work around the facility. Every morning they had to clean the dorm.

26 They had to do their own dishes. It was not sanitary. They washed them in a bucket and rinsed

27 them off. They didn't change the water sometimes for the 60 kids that were there. They then

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1 dripped dry. Children were the ones who cleaned the bathrooms. They also worked on the ranch
2 clearing lambing pens, and going on the sheep trail.

3 **ANIMAL ABUSE/NEGLECT**

4 31. I was brought up with animals so I was shocked to see horses whose hooves were
5 curling from neglect. Dogs were not fed but rather had to find their own food.

6 32. If the children touched one of Dan Peart's working dogs the dog would be shot. The
7 children told me about it.

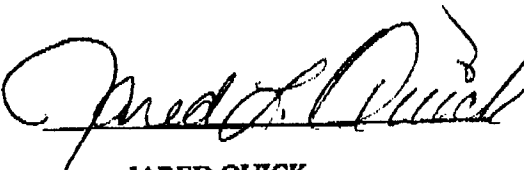
8 **DIRECTOR'S/OWNER'S INVOLVMENT WITH THE CHILDREN**

9 33. Wayne Winder is a large man who is 6'7" or 6'8" and towers over people. He has a
10 very bad temper. I have seen him get in children's faces, yelling at them and threatening them. It
11 does not take much to push his buttons and once you do he gets very angry. I have seen him chase
12 children, drag them, throw them to the ground, and perform unnecessary and harsh restraints
13 while they were lying on their stomachs.

14 34. I have seen Wayne grab children by the nap of the neck and drag them on the ground.

15 35. I saw Wayne tackle a 14-year old boy and throw him to the ground when he did not
16 want to get his hair cut. He restrained him in the hog-tied position while he and Gabe Goynes, a
17 staff member, sat on his legs and back. Gabe sat on the child's legs while they were bent towards
18 his body. Wayne sat on his back. The child's arms were held behind his back. They had him on
19 his stomach and would flip his head from side to side to shave it. They shaved his head until he
20 was bald. It was a very rough physical restraint.

21 WITNESS my signature this 25 day of February, 2005.

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23 

24 JARED QUICK