

1                   **GENERAL AFFIDAVIT UNDER OATH OF KARLEEN FARNSWORTH**

2                   I, KARLEEN FARNSWORTH, declare and state as follows:

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4                   1.           I, KARLEEN FARNSWORTH ("Declarant"), am a resident of Ogden, County of  
5                   Weber, State of Utah, and do hereby certify, swear or affirm, and declare that I am competent to  
6                   give the following declaration based on my personal knowledge, unless otherwise stated, and that  
7                   the following facts and things are true and correct to the best of my knowledge.

8                   2.           I worked at Majestic Ranch for three weekends during the month of January 2005. It  
9                   did not take long for me to realize something was desperately wrong. During my employment  
10                  there I witnessed child abuse and neglect, animal neglect, and unhealthy living conditions. The  
11                  children looked listless and depressed.

12                  3.           I have past employment history with the Youth Corrections for the State of Utah. The  
13                  training I received while I was employed there alerted me that some of the practices I witnessed at  
14                  Majestic Ranch were inappropriate.

15                  4.           I was appalled at the way the children and animals were treated

16                  5.           I contacted an organization called ISAC who gave me the telephone number for  
17                  Craig Barlow, the Attorney General for the State of Utah. Craig Barlow gave me Debbie  
18                  Kurzban's direct number with the Department of Licensing and I called and left her a message. In  
19                  the meantime, I called the Office of Licensing and asked for Ken Stettler and spoke with his  
20                  partner who told me to contact Children Protective Services in Logan.

21                  6.           I reported the abuse to Child Protective Services in Logan, Utah, who told me they  
22                  would look into it. I never heard back from them.

23                  7.           Isabelle Zehnder contacted me to discuss the situation at Majestic Ranch. I told her  
24                  about the abuse and neglect that I had witnessed, as well as the horrible living conditions.

25                  **CHILDRENS' MENTAL, PSYCHOLOGICAL, PHYSICAL ISSUES**

26                  8.           I was unaware when I took this job that I would be dealing with children with serious  
27                  psychological issues. My understanding was that I would be working with children with behavior

1 issues and with animals. I took this job not for the money but for the experience of putting  
2 children and animals together and making a difference.

3 9. I had no idea and was shocked when I learned I would be working with children who  
4 ranged from a child who came from a distinctive family and who had never been in trouble to a  
5 child who, before coming to Majestic Ranch, had been in a mental institution.

6 10. I was asked to work with girls who were bi-polar and suicidal and who suffered from  
7 conditions such as abandonment and other psychological issues, post-traumatic disorder, and  
8 night terrors.

9 11. Girl #1 was beaten and raped in a Russian orphanage and suffered from night terrors.

10 12. Most of the girls suffer from sleep disorders. In the 10-13 year old dorm, girls woke  
11 up screaming in the middle of the night, some with night terrors, others with nightmares.

12 13. Girl #2 did not think her mother would be happy to know what is going on at the  
13 ranch. I took her out to see a horse and she was shocked to learn animals have a brain. She was  
14 excited when I cut up an apple and she fed it to the donkey. I was surprised that for a working  
15 ranch the children were not more associated with the animals and animal behavior.

16 **UNUSUAL TREATMENT AND PUNISHMENT/CHILD ENDAGERMENT**

17 14. ADAPT is for children who receive too many consequences or who have a bad  
18 attitude. Children were made to stand on milk crates in subfreezing weather for extended periods  
19 of time.

20 15. Girl #3 pushed girl #4 and was sent to ADAPT for an hour and a half with  
21 inappropriate clothing. I witnessed boys being sent to ADAPT more often than girls.

22 16. Boy #1 was walking around the parking lot and did not want to go inside. Staff asked  
23 him to come in but he kept walking in circles. The staff member who was having trouble getting  
24 him inside called several other staff members. One of those staff members told me to come along,  
25 that I would need to see how this was done. I saw that rather than try to talk to boy #1 they  
26 quickly resorted to restraining him. He is a very small-built child and the man who restrained him  
27 was large. I and two others watched as they threw him to the ground, his face in the snow,  
28 grabbed his arms and legs, pulled them up behind his back in the hog tied position. They counted  
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1 down out loud, held him there for some time, and then released him. They left him there lying in  
2 the snow until he finally went inside.

3 17. I was told by another staff member that Tori A. Jones is the Family Representative at  
4 Majestic Ranch. Her husband, Dave Jones, beat up boy #2 last year and was put on driving duty  
5 and taken away from his parent duties. Boy #2 was beaten was sent to Jamaica. Dave Jones  
6 currently works at Majestic Ranch once again as a driver, driving children to their appointments.  
7 There are times when the ranch has been understaffed so he has filled in, working directly with  
8 the children again.

9 18. One of the staff members told me that boy #3 drank shampoo in hopes of getting sick  
10 enough for their parents to withdraw him.

11 19. Staff admitted to me that children who refuse to shovel manure are forced to do so  
12 with their bare hands.

13 20. Suicidal kids or kids who have "run plans" are dressed in orange. They only get one  
14 set of orange clothing, 2 underwear, 2 socks, a set of thermals, a pair of shorts, one T-shirt, an  
15 orange sweat-shirt hoody. They do not get pajamas and have to sleep in the same clothes. The  
16 clothes only get washed once a week.

17 21. There are Peruvian male ranch hands whose sleeping quarters are only 100 yards or so  
18 from the boys' dorms.

19 22. Boy #1's mother died while he was at Majestic Ranch. He was not allowed to attend  
20 the funeral and it was deemed "not in his best interest."

21 23. It is my opinion from what I witnessed that children are being mentally abused.

22 24. Many of the children had outgrown their clothing but were still forced to wear them.

23 25. Two staff members, Manda and Evalisa, were mean to the girls. When they were  
24 doing shut-down at 9:00 p.m. they told the girls not to get out of bed or to go to the bathroom  
25 until they (Manda and Evalisa) were asleep, or the girls would get consequences. Sometimes  
26 Manda and Evalisa did not go to sleep until midnight or 1:00 a.m. Some of these girls wet the bed  
27 as a result. These girls told me their sheets were not washed. They were made to wear pull-up  
28 diapers that are designed for toddlers. These children are 12-13 years old.

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1 26. Children are fed a minimum amount of poor quality, high carb foods and are always  
2 complaining that they are hungry. Rather than feed them high-quality foods, they receive a lot of  
3 canned foods and ready-packed foods. They are served a bare minimum of fresh fruits and  
4 vegetables.

5 **LACK OF PROPER AND PROMPT MEDICAL CARE FOR THE CHILDREN**

6 27. Girl #4 had a terrible case of scabies with huge sores on her body. She had been seen  
7 and diagnosed by a doctor and given medication. Several other girls then developed scabies and  
8 were not taken to the doctor. Rather, they were treated with lice shampoo. The outbreak has been  
9 going on for over three months.

10 28. Food and water were making children and staff sick with vomiting and diarrhea; staff  
11 must bring their own food and water to avoid serious stomach problems

12 29. Children were sick with diarrhea and vomiting daily and suffered from stomach pain

13 30. Several girls were sick with the flu and had high fevers and vomiting. One of the girls  
14 was sick in bed vomiting in a garbage can.

15 31. A call came over the radio saying a boy's tooth had fallen out and the remaining  
16 portion in his mouth was black. That happened the first weekend I was there and he had not been  
17 treated by the time I left three weeks later.

18 32. Many girls complained of backaches from being forced to sit on hard floors for  
19 extended periods of time.

20 33. Girl #5 suffered from severe knee pain the entire three weeks I was there. She was not  
21 taken to a doctor. She finally came down with 104° fever and was taken to the emergency room  
22 where she was diagnosed with pneumonia. She returned with a knee brace and crutches.

23 34. Girl #6's glasses were broken for over a month and she still did not have new ones nor  
24 had she seen a doctor before I left.

25 35. There are many children who are taking medications daily. They were taking  
26 prescription drugs for conditions ranging from ADD/ADHD/ bi-polar, depression, etc., that were  
27 administered by staff, one being a 19 year old female. When I worked for corrections we were not  
28 allowed give out even an aspirin.

1 36. No nurse was on-site to administer these drugs. No nurse was on-site ever.

2 37. Some children complained they were being administered the wrong doses of their  
3 medications.

4 **ANIMAL ABUSE/NEGLECT**

5 38. When I approached a dog to pet it I was told by the children and staff to not touch the  
6 dogs or they would be shot, especially the white dogs because they are working dogs.

7 39. Ranch dogs feed on the carcasses and come back with blood on their faces.

8 40. I was told by my shift leader that Dan Peart shot sick animals in front of the children.

9 41. Weanlings are made to stand tied with no water access, putting them at risk of  
10 strangulation, foundering, and dehydration.

11 42. Mature horses eat snow because water is a far distance from their feed pile. Their  
12 hooves are overgrown.

13 43. Bands of horses roam the property in search of food.

14 44. The donkey has overgrown hooves that are curled at the tips.

15 **CHILD LABOR LAW VIOLATIONS**

16 45. Children (mostly boys) are forced to work outside after dark in the freezing cold  
17 weather shoveling snow.

18 46. Girls were made to clean the owner's personal guest house located across the facility.

19 47. Children clean classrooms, the kitchen, their dorms, their bathrooms, and do their  
20 laundry. They do their own dishes in dirty water. There was no sanitation system while I worked  
21 there.

22 48. I was told by the children and other staff that during the summer girls do the gardening  
23 and painting and boys do the ranching.

24 **POOR, UNSAFE LIVING CONDITIONS**

25 49. The windows in the girls' dorm were screwed shut.

26 50. There was no smoke detector in one of the girls' dorms.

27 51. Staff are told to sleep with their beds in front of the door at night so that children will  
28 not escape, which was a fire hazard.

1 52. There was only one bathroom for 12 or more girls. The door was always propped open  
2 and the girls never had privacy of any kind.

3 53. Bedding was not cleaned on a regular basis. There was only one washer and drier in  
4 the girls' dorm. Some girls had to do their laundry in another building. Because there were not  
5 enough washers and driers clothes were not always clean.

6 54. Frozen meat was taken out of the freezer during the day by around 3:00 p.m. and was  
7 left on the counter to thaw overnight.

8 55. There was no sanitation process for the dishes, silverware, pots, or pans. They were  
9 washed in a pot of soapy water and rinsed in cold water by the children, placed into a dish  
10 drainer, and used by the next group of children. The same pot of soapy water was used by many  
11 children -- sick or healthy.

12 56. The cook never wore a hair net and no rubber gloves.

13 57. The children were not allowed time to wash their hands before meals.

14 58. I brought a bottle of hand-sanitizer and a bottle of lotion and the girls acted as though I  
15 had given them gold.

16 59. There were dead animal body parts around the yard.

17 **BRAINWASHING**

18 60. I witnessed a 15 year old girl, girl #7, who ran creative visualization groups for  
19 children where she would play music and tell the children to picture their family, then picture  
20 their family leaving them because they had done bad things. All twelve girls were in tears.

21 61. Girl #7 would have them stand six in a row across from one another, close their eyes,  
22 put their hands out in front of them, and ask things like "see, don't you want to give (your  
23 brother) a hug? You can't because you hurt him and you must behave. That is how your family is  
24 feeling because you are here. Empty."

25 62. Girl #7 knew students' specific family names and situations. For example, one girl had  
26 been molested. She knew the girls' perpetrator and asked the child how her behavior could have  
27 changed the situation so that she would not have been molested.

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1 63. She went around the room, knowing personal information about each child, and using  
2 their negative situations against them by visualizing that person in front of them and then she  
3 would pretend she was that person. She talked "if you would behave and do as I told I would not  
4 have had to send you away."

5 64. She would have the girls picture their homes and their own bedrooms. She had them  
6 visualize their stuffed animals, toys, bedding, and then would ask "imagine your mom and/or dad  
7 staring at an empty room because that is what they have to deal with because you are gone."

8 65. Later that night when we had "group" girl #7 addressed each girl individually. She  
9 would ask them things like "by the work that you did earlier today, what do you think you need to  
10 work on for your program?" When the child answered, other children gave their feedback,  
11 something they were required to do. Feedback was almost always negative. It was as though in  
12 order for them to accomplish anything they had to be completely broken down.

13 66. Girl #7 had the girls play a game. She would pick one girl and whisper one of the  
14 other girl's name in her ear. The girl would then have to say things about the girl or act like the  
15 girl and then everyone would have to guess who it was. Example: one child describing another's  
16 personality and behavior would say something like "I hate my mom, she's such a bitch, she sent  
17 me here." And then later she would say "I love my mom and I miss her." The girls then had to  
18 guess her name.

19 67. Some girls, girl #7 in particular, were extremely programmed. If I didn't know the  
20 proper procedure for something, even something very minor like going outside, she would melt  
21 down. She did not get angry but rather she grasped for procedures and rules. She could not handle  
22 any variance to the program.

### 23 LACK OF STAFF TRAINING/ISSUES WITH STAFF

24 68. During my last week at Majestic Ranch I was told by my shift leader and the  
25 supervisor that several disgruntled employees walked off their jobs demanding better food and  
26 drinking water for the children, better health care for the children, and better housing for the staff.  
27 When staff tried to leave they were warned they would be turned in for child abandonment. Some  
28 stayed as a result of that threat.

1 69. Based on my experience with youth corrections, many of the staff were untrained to  
2 deal with the youth in the program.

3 70. Staff were encouraged to look at the negative side of the child, not the positive.

4 71. There were two female staff who were mean and ignorant who quit during my 2<sup>nd</sup>  
5 week. The children were unable to talk to them and were scared they would make them mad.

6 72. I was then alone to care for all of the girls during my third and last weekend at  
7 Majestic Ranch except when one woman came in late Saturday afternoon and left Sunday, but  
8 other than that I was alone with the girls from Friday afternoon until Monday morning.

9 **POOR, UNSAFE LIVING CONDITIONS**

10 73. There is currently a sewage backup and raw sewage is flowing on the property; it is  
11 frozen and not visible, but can be smelled from the tap; she plans to take a picture of a sign by  
12 one of the bathrooms asking staff not to shower as it will contribute to the leach field problem

13 74. Girls are housed in a double-wide pre-fab trailer split into 2 "dorms," one side for  
14 younger girls, the other for older girls

15 75. One side has no smoke detector

16 76. Windows have nails in them so they will only open about 2 inches - fire hazard

17 77. Raw meat is left out all day and if concerned staff did not refrigerate it, kitchen staff  
18 would keep it out all night

19 78. The kitchen is below health code, dishes are not washed in a sanitary manner; rumor  
20 has it a new kitchen will be installed that will be up to code; she has heard more kitchen staff  
21 should be hired so the children do not have to continue to do all the work

22 79. Powdered milk used 1/2 and 1/2 with regular milk (kids are told milk is too expensive  
23 - parents are paying over \$3,000 a month)

24 80. Expired milk is given to the children

25 81. Clothing is rationed; some girls receive only 2 pair of underwear a week; when they  
26 complained they were dirty, they were told to turn them "inside out"

27 82. Female staff member was forced to sleep with boys due to being understaffed. This  
28 staff member witnessed a top bunk fall onto a boy on the bottom bunk

1 83. Bed sheets were not cleaned for over a month

2 84. Several girls wet their beds and there is suspicion they sleep in soiled bedding; she  
3 plans to find out more about this next week

4 85. Bathroom door is propped open at all times; no privacy

5 WITNESS my signature this 21st day of February, 2005.

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9 **KARLEEN FARNSWORTH**

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