



January 16, 2020

TO: [REDACTED]
Assistant Director for Detention Management

FROM: [REDACTED]
Lead Compliance Inspector
The Nakamoto Group, Inc.

SUBJECT: **Annual Detention Inspection of the Imperial Regional Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Imperial Regional Detention Facility in Calexico, California during the period of January 14-16, 2020. This is a CDF facility.

The inspection was performed under the guidance of [REDACTED], Lead Compliance Inspector. Team members were:

Subject Matter Field	Team Member
Detainee Rights	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual inspection which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the January 2019 inspection.

Inspection Summary

The Imperial Regional Detention Facility is currently accredited by:

- The American Correctional Association (ACA) – Yes
- The National Commission on Correctional Health Care (NCCHC) - Yes
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - Yes

Standards Compliance

The following information is a summary of the standards that were reviewed and overall compliance that was determined as a result of the 2019 and 2020 annual inspections:

2019 Annual Inspection	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

2020 Annual Inspection	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

The inspection team identified four (4) deficient components in the following standard:

Food Service—4

Facility Snapshot/Description

The Imperial Regional Detention Facility is owned by the Imperial Valley Gateway Center, LLC. Management and Training Corporation (MTC) has contracted with ICE to operate the facility. The facility is physically located in the eastern outskirts of Calexico, California, approximately 130 miles east of the San Diego International Airport. The facility, constructed in 2014, [REDACTED] As of December 20, 2019, the facility's designation changed from a dedicated IGSA (DIGSA) to an ICE Contract Detention Facility (CDF). The facility houses adult male ICE detainees of all classification levels and female ICE detainees classified as low and medium custody. [REDACTED]

The facility is a single level structure containing eleven general population housing units each with a [REDACTED] Both cell and dormitory beds are available. The facility has a special management unit (SMU) which contains [REDACTED]. All housing units are provided direct supervision by detention officers; oversight of housing units and hallways is supplemented by multiple cameras mounted inside the units and throughout the facility. Two fourteen-foot fences surround the perimeter. Both fences are enhanced with razor ribbon on and between the fences. Additionally, a vibration sensor shaker system is installed on the interior fence. Mounted cameras provide visual surveillance.

Each general population housing unit has a dayroom area equipped with tables, chairs, two televisions, seven telephones, nine electronic tablets, board games, card games and a sufficient number of showers and wash basins. There is an outdoor recreation area attached to each general population housing unit which is available to detainees daily between the hours of 7:30 a.m. and 9:00 p.m. Additionally, the facility has a large recreation yard where detainees may engage in various exercise activities such as walking, jogging, basketball, volleyball and intramural games between housing units of appropriate custody designations. Detainees housed in general population have access to this large outdoor recreation area two hours per day, seven days a week. Detainees housed in the SMU have access to recreation areas out of their cells one hour per day, seven days a week. Detainees in low and medium-low custody are permitted to participate in the voluntary work program outside of their housing unit. The facility also offers a variety of educational and training classes to detainees.

Each general population housing unit was recently provided nine electronic tablets. Detainees may use an electronic tablet to communicate with various facility and ICE staff, file a grievance, order commissary and access various educational and gaming applications. For a fee, detainees may communicate with family and friends via email, engage in a video visit, or download music and videos.

Overall, the inspection team found the atmosphere in the facility to be calm with no obvious indicators of high stress. Facility and ICE staff were observed interacting with detainees in the housing units. Sanitation and cleanliness throughout the facility were observed to be above average.

All housing units and common areas of the facility were visited and/or observed during the inspection. No less than fifty detainees were interviewed informally, either individually or in small groups. Twenty-two formal interviews were conducted. Nineteen formal interviews were with detainees with limited English proficiency (LEP); three were with transgender detainees. Language line was used to interview detainees who spoke neither English nor Spanish. A bi-lingual member of the inspection team conducted formal interviews with Spanish speaking detainees. The detainees voiced no concerns regarding life/safety issues. Detainees stated they felt safe and were generally satisfied with the interaction, responsiveness, and professionalism of facility and ICE staff and with access to medical services, mail, the law library, telephones, visitation, and recreation. Detainees expressed general satisfaction with the quantity and quality of food provided.

During detainee interviews, one detainee complained of pain in the back of his head and that he was not getting his prescribed diet. A review of his medical record showed that he was sent for a CT scan of the head which was found to be normal. He also has a low salt diet ordered by the provider.

Three transgender detainees were interviewed and voiced no concerns; the detainees stated they felt safe in this facility.

Some detainees stated that ICE officers do not visit with them in their housing units. The LCI, as part of the Staff-Detainee Communication standard inspection, reviewed this issue. A schedule for ICE visits is posted in each housing unit and each housing unit has a sign-in log which is only used to document ICE visits. The logs substantiated that ICE staff are in the housing units three times weekly on Tuesday, Wednesday and Thursday. ICE officers were observed visiting housing units during the inspection. Detention staff interviewed confirmed that ICE officers routinely visit the housing units and speak to detainees.

Detainee telephone services are provided via the ICE contract with Talton Communications. All other services are provided by MTC.

ICE detainees do not incur medical co-pays.

Areas of Concern/Significant Observation

There were no areas of concern or significant observations.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance Based National Detention Standards (PBNDS) 2011. No standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty-one (41) standards were found to be in compliance.

LCI Assurance Statement

The findings of compliance and non-compliance are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at



The Nakamoto Group, Inc.

the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

January 16, 2020

Printed Name of LCI

Date