

November 7, 2019

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Montgomery County Jail**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) of the Montgomery County Jail in Montgomery City, Missouri during the period of November 5-7, 2019. This is an IGSA 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]
Safety	[REDACTED]

### **Type of Inspection**

This is a scheduled annual inspection which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The facility was not inspected in 2018.

### **Inspection Summary**

The Montgomery County Jail is currently accredited by:

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

### **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 annual inspection:

<b>2018 - No Inspection</b>	
Acceptable	N/A
Deficient	N/A
Repeat Deficiency	N/A
Not Applicable	N/A

<b>2019 Annual Inspection</b>	
Acceptable	38
Deficient	0
Repeat Deficiency	0
Not Applicable	1

The inspection team identified eight (8) deficient components in the following three (3) standards:

Food Service – 1  
Environmental Health and Safety – 3  
Key and Lock Control – 4

### **Facility Snapshot/Description**

The Montgomery County Jail is located in Montgomery City, Missouri approximately 75 miles west of St. Louis. The facility is owned by Montgomery County and operated under the jurisdiction of the Montgomery County Sheriff's Office. The jail currently houses adult male and female ICE detainees of all classification levels and adult male and female Montgomery County detainees. The facility houses ICE detainees with non-ICE detainees of compatible custody levels. [REDACTED]

The jail opened in 1997 and has an operational/rated [REDACTED]. The facility is a multi-story structure in the middle of town; it houses the Sheriff's Office, county court rooms and administrative offices, the county 911/dispatch center, and the jail. The secure perimeter of the building is the exterior walls of the building. All exterior doors are under monitored camera surveillance and controlled by central control officers. The 58 surveillance camera network also monitors all of the housing units, common areas, and movement corridors. There is no perimeter fencing around the building but the entire perimeter is under constant monitored surveillance camera coverage. Once each shift an unarmed officer patrols the perimeter of the building on an irregular schedule to identify existing or potential security breaches.

The jail contains six general population housing units. Five housing units are for male detainees and one for female detainees. There is no dedicated special management unit. Detainees worthy of such status are sheltered in place and subject to restricted movement and comingling. All movement is escorted. The five male housing units are two-tier design ranging from eight to twelve cells per unit and two to four beds in each cell. The female housing unit is a ten-bed dormitory. Direct supervision is the management model in all housing units. Overall the facility is maintaining an adequate level of cleanliness.

All housing units have a dayroom equipped with one television and fixed dining/seating tables where detainees can play board games, cards, and engage in social interactions with one another and eat their meals. Each housing unit has one kiosk on which detainees can file requests; submit grievances; shop at the commissary; review activity schedules, bulletins, pro bono/consulate lists and handbook content; submit medical call pass requests; partake in video-visits; and access the LexisNexis law library collection. All detainees have access to outdoor recreation for at least one hour a day five days a week.

Detainees were noticeably polite to staff and spoke freely with the inspection team. The inspection team conducted several interviews with detainees in public, private, and confidential settings. Some of the LEP interviews were assisted by the use of a language line. Detainees voiced no substantive complaints or concerns when questioned



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about their personal safety, treatment by staff, medical care, asylum requests, consulate/court access, ICE services, visiting privileges, law library access, or food services.

Medical care is provided by two Montgomery County contract nurses and one Advanced Correctional Healthcare, Inc. contract physician. Food service is contracted to Consolidated Food Services, Inc. Maintenance services are provided by Montgomery County employees. Detainee telephone services are provided by Legacy Inmate Communications. Housing unit kiosks are managed by TurnKey Corrections. ICE detainees are not charged a medical co-payment.

### **Areas of Concern/Significant Observations**

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 Acceptable. The facility complies with the ICE National Detention Standards (NDS). No (0) standards were found Deficient and one (1) standard was Not Applicable (N/A). All remaining thirty-eight (38) standards were found to be in compliance.

### **LCI Assurance Statement**

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

November 7, 2019

Printed Name of LCI

Date