

June 20, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual/180 Day Follow-Up Detention Inspection of the St. Clair County Jail**

The Nakamoto Group, Inc. performed an annual/180-day follow-up inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008) of the St. Clair County Jail in Port Huron, Michigan, during the period of June 18-20, 2019. This is an IGSA facility.

The annual 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/180-day follow-up inspection, which is performed to determine overall compliance with the ICE PBNDS 2008 for Over 72 hour facilities. The facility received a previous rating of Does Not Meet Standards during the August 2018 annual inspection.

Inspection Summary

The St. Clair 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 2018 Annual Inspection and 2019 180-day follow-up annual inspection.

2018 Annual Inspection	
Meets Standards	39
Does Not Meet Standards	1
Repeat Finding	0
Not Applicable	1

2019 Inspection	
Meets Standards	39
Does Not Meet Standards	0
Repeat Findings	0
Not Applicable	2

The inspection team identified two (2) deficient components in the following two (2) standards:

Suicide Prevention and Intervention -1
Correspondence and Other Mail - 1

Facility Snapshot/Description

The St. Clair County Jail was constructed in 2005 and is located in Port Huron, Michigan. The facility is owned by the County of St. Clair and operated by the St. Clair County Sheriff's Department. [REDACTED] The direct supervision facility currently houses all custody levels of adult male and female detainees for ICE, U.S. Marshals Service, Federal Bureau of Prisons, and St. Clair County. [REDACTED]

ICE detainees are commingled in housing units with other populations of similar custody levels. With the exception of the dedicated segregation management units, five housing units consist of dormitory style beds. Housing units are well lit with both natural and artificial light and have adequate open space for detainees. Large dayrooms in each of the housing units are furnished with numerous tables and chairs for detainees to participate in leisure time activities and socializing. Detainees were observed playing board games, reading, playing cards, visiting, watching television, and sending electronic mail to family members through use of computer tablets provided by a vendor. An outside enclosed recreation area is attached to the housing unit and is available at scheduled times each day for detainee use.

The entire facility is climate controlled. The inspection team found the environment to be relaxed with detainees freely approaching inspectors, ICE officials, and facility personnel to participate in formal interviews and general discussions. While the facility appeared in good repair, the sanitation level was found to be average. All officers interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and staff were professional when dealing with detainees and the inspection team.

The inspection team interviewed 49 LEP and English speaking detainees confidentially, in small groups, and individually in housing units or other common areas of the facility. There were no substantive concerns voiced when asked about their personal safety, ICE services, treatment by staff, access to telephone, access to mobile law library, or food services. During one LEP confidential interview a detainee expressed his concern being housed with county offenders who received a sentence, stating that county offenders who are serving a longer sentence are disruptive to ICE detainees and entice them to engage in negative behavior. This concern was not widely found among detainees during ICE interviews but was brought to the OIC's attention. Another detainee raised a concern about medical treatment that he was receiving for a rash and skin irregularities. The medical compliance inspector reviewed the medical file and conducted an interview with the detainee. At the completion of the interview, the medical compliance inspector shared his observations and concerns with the HSA who arranged for a meeting with the detainee to ensure that all relative medical concerns were being addressed.

Medical services are provided by Lake Huron Medical Center. The facility does not charge co-pays for medical, mental health, or dental care. Food services are provided by Aramark.

Detainee telephone services and video visitation kiosks and services are provided by Securus Technologies Inc., via contract with the facility. Global Tel Link (GTL) provides computer tablet services to detainees that includes electronic mail.

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 Meets Standards. The facility complies with the ICE Performance-Based National Detention Standards (PBNDS) 2008. No (0) standard was found Does Not Meet and two (2) standards were Not Applicable (N/A). All remaining thirty-nine (39) 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-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

June 20, 2019

Printed Name of LCI

Date