

June 27, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the La Palma Correctional Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the Performance Based National Detention Standards (PBNDS 2011) of the La Palma Correctional Center in Eloy, Arizona, during the period of June 25-27, 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]
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.

Inspection Summary

The La Palma Correctional Center is currently accredited by:

- The American Correctional Association (ACA) – Yes
- The National Commission on Correctional Health Care (NCCHC) - No
- 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 PBNDS 2011 annual inspection:



The Nakamoto Group, Inc.

2019 Annual Inspection	
Meets Standard	39
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	3

The inspection team identified six (6) deficient components in the following five (5) standards:

- Admission and Release—2
- Correspondence and Other Mail—1
- Disciplinary System—1
- Hunger Strikes—1
- Significant Self-Harm and Suicide Prevention and Intervention—1

Facility Snapshot/Description

The La Palma Correctional Center is located on a rural road in Eloy, Arizona, approximately sixty miles southeast of the Phoenix Sky Harbor International Airport. The facility, constructed in 2008, is owned and operated by CoreCivic. The City of Eloy, Arizona, has an IGSA with Homeland Security-ICE and sub-contracts with CoreCivic to operate the facility. The facility [REDACTED] houses all custody levels of adult male ICE detainees. During the previous twelve months, the facility has housed both male ICE detainees and male inmates from the California Department of Corrections (DOC). The California DOC has been depopulating the facility and returning their inmates to California. On the first day of the inspection the last remaining California DOC inmates departed the facility. [REDACTED]

The facility is a large complex consisting of multiple buildings spread across three compounds. The administration building is located outside the secure perimeter. The visitation building and a building referred to as the “main” building, which houses receiving and discharge (R & D), the medical department and central control, are located immediately inside the secure perimeter. Three “compounds” separated by security gates and referred to as Compound 1, Compound 2 and Compound 3, contain the detainee housing units, recreation yards and programmatic offices. Each compound has detainee housing in three buildings which contain either three or four housing pods. Housing pods have a capacity of either sixty or 120 beds and are under direct supervision of an officer assigned inside the pod. Cameras are also located inside the housing pods and throughout the facility. Detainees are identified as either Eloy docket or Florence docket and are not housed together. During the inspection, Compound 2 was dedicated to Florence docket detainees, Compound 3 to Eloy docket detainees and Compound 1 was evenly split between the two dockets.

The facility provides nine outdoor recreation areas; three on each of the compounds. Detainees are afforded access to the recreation yards at least one hour per day, seven days per week. Dayrooms in each housing unit contain a combination pull-up bar/dip-bar device for exercise. Housing areas provide adequate dayroom space, restroom facilities and seating areas for their maximum occupancy. Televisions, playing cards, board games, a monitor with Xbox games, kiosks for purchasing commissary items and microwave ovens are available in the dayrooms.

The entire facility is climate controlled. Cleanliness and sanitation throughout the facility were observed to be above average.



The Nakamoto Group, Inc.

All housing units and common areas of the facility were visited and/or observed during the inspection with the exception of five housing pods which were under cohort (quarantine) for mumps.

Numerous detainees were interviewed; some interviews were in housing units or work areas with small groups of detainees and several were private and confidential and included detainees with limited English proficiency (LEP). Interviews included detainees who had recently arrived at the facility and some who had been housed at the facility for longer periods of time. 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.

Two detainees housed on the same compound stated they were not consistently offered outside recreation. This issue was discussed with the chief of security who was aware of the problem and had already made adjustments to the recreation schedule to address the issue. The schedules required adjustments after the last of the inmates from California departed the facility on the first day of the inspection which resulted in some housing changes and changes in utilization of the recreation yards.

Seven transgender detainees were housed at the facility during the inspection; all seven were interviewed in a private and confidential setting. Three of the transgender detainees complained that they were removed from their jobs and they felt this constituted discrimination. Follow-up by the medical SME discovered that the detainees had been temporarily suspended from their jobs because their housing units were on cohort (quarantine) for mumps. The detainees will be permitted to return to their jobs once the quarantine is lifted.

Detainee telephone services are provided by Securus Technologies; medical services are provided by CoreCivic; and food service operations are contracted with Trinity Services Group.

ICE detainees do not incur medical co-pays.

Areas of Concern/Significant Observations

The inspection team did not identify any 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. No (0) standards were found Does Not Meet Standard and three (3) standards were Not Applicable (N/A). All remaining thirty-nine (39) standards were found to be in compliance.

LCI Assurance Statement

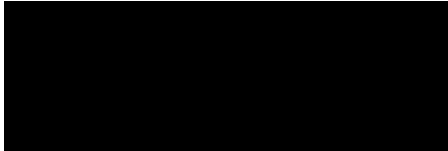
The findings of compliance and non-compliance are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials [REDACTED]



The Nakamoto Group, Inc.

- Facility Staff [REDACTED] and various other supervisors and staff



[REDACTED], Lead Compliance Inspector

June 27, 2019

Printed Name of LCI

Date