

February 22, 2019

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Brooks County Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) of the Brooks County Detention Center in Falfurrias, Texas during the period of February 20-22, 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]
Safety	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[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 received a previous rating of Acceptable during the April 2018 inspection.

### **Inspection Summary**

The Brooks County Detention Facility 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 2018 and 2019 NDS compliance annual inspections:

2018 Annual Inspection		2019 Annual Inspection	
Acceptable	36	Acceptable	36
Deficient	0	Deficient	0
Repeat Deficiency	0	Repeat Deficiency	0
Not Applicable	3	Not Applicable	3

The inspection team identified one (1) deficient component in one (1) standard:

Security Inspections – 1, which is a repeat deficiency

### Facility Snapshot/Description

The Brooks County Detention Center (BCDC) is located in a rural area of Falfurrias, Texas, approximately 120 miles south of San Antonio. The facility is owned and operated by the Geo Group, Inc. (GEO) [REDACTED]

[REDACTED] All detainee services are provided by GEO employees. During this inspection period, low custody male ICE detainees were housed at BCDC from May 2018 until August 2018. Available documentation from this period was inspected by the team.

Brooks County has an Intergovernmental Service Agreement (IGSA) with ICE to house low security male and female detainees. [REDACTED]

[REDACTED] ICE detainees were housed in two 48-bed dormitories. [REDACTED] The chief of security confirmed that most detainees are housed for two to three days. The facility does not hold detainees in restrictive housing. A detainee presenting disciplinary issues or medical concerns would be transferred immediately.

The day rooms are equipped with televisions, microwaves, telephones, water fountains, tables and chairs. Radios may be purchased through the commissary. Large outdoor recreation areas are available for soccer, basketball and walking. Sanitation and cleanliness standards were adequate. The majority of the staff members are bilingual. Staff were observed to be professional in appearance and demeanor. All employees interviewed were well-versed in the requirements of the National Detention Standards. Detainees are not charged a copayment for medical care.

### 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 three (3) standards were Not Applicable (N/A). All remaining thirty-six (36) standards were found to be in compliance.

### **LCI Assurance Statement**

The findings of Acceptable and Deficient 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]
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

February 22, 2019

Printed Name of LCI

Date