



The Nakamoto Group, Inc.

August 19, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Allen Parish Public Safety Complex**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Allen Parish Public Safety Complex in Oberlin, Louisiana during the period of August 17-19, 2021. This is an IGSA.

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

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

Type of Inspection

This is a scheduled annual inspection to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the December 2020 annual inspection.

Inspection Summary

The Allen Parish Public Safety Complex is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCCHC) - 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 December 2020 and August 2021 PBNDS annual inspections:



<i>2020 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	4

<i>2021 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	4

The inspection team identified ten (10) deficient components in the following four (4) standards:

- Tool Control – 1, a priority component
- Disciplinary System – 5, one is a priority component and five are repeat deficiencies
- Food Service – 2
- Visitation – 2, both are priority components

Facility Snapshot/Description

The Allen Parish Public Safety Complex is owned by Allen Parish and operated under the jurisdiction of the Allen Parish Sheriff’s Office. The facility, which is located sixty miles south of Alexandria, Louisiana, houses adult male ICE detainees with a low custody level, adult female and male Allen Parish and surrounding jurisdiction prisoners and adult male State of Louisiana Department of Corrections inmates.

The facility was built in 2019. The complex is comprised of two separate single-story buildings. The secure outer perimeter of the compound is designed with two twelve-foot chain link fences with rows of razor ribbon affixed to the interior side of the exterior fence line, there are no supplemental detection systems installed between the fences. The facility perimeter is irregularly foot-patrolled by an unarmed officer 24 hours a day. Surveillance cameras offer visibility around the entire perimeter, into the housing units, recreation yards, the common areas and interior movement corridors. All exterior building doors and interior movement corridor gates are controlled by central control staff, and are under constant camera surveillance through a camera network that is monitored 24 hours a day.

The facility has ten individual general population housing units managed by indirect supervision. All movement is monitored. All security staff carry a radio. The general population housing units are all dormitory design. There are two special management units (SMU); they are all two-bed cells. There were no ICE detainees in the SMU during the inspection. One housing unit currently serves as a COVID-19 quarantine/isolation unit where newly admitted detainees and existing detainees are housed until negative testing results/protocols are complete. During the inspection there were no active COVID-19 cases in the facility. The health care unit is not an infirmary.

Each housing unit has a common dayroom equipped with one television, individual telephone stations, fixed table/chair units for detainees to eat their meals, play games and gather for conversation and two kiosks on which detainees can conduct their remote video-visits, order commissary and access facility program schedules and menus. Every housing unit has a dedicated room equipped with one LexisNexis work station open during daily waking hours for detainee to conduct their legal research/casework. Information not included on the kiosks is posted on the housing units’ bulletin boards. Dayrooms are accessible daily from 7:00 a.m. to 10:00 p.m. Detainees are provided daily indoor and outdoor recreation. The facility is maintaining an average level of sanitation.



There were no detainees who signed-up or volunteered for a formal confidential interview. However, approximately twenty detainees were informally interviewed by inspectors in the housing units, in intake and on the recreation yards. None of the detainees registered any complaints about their overall treatment by staff or other detainees, medical care, ICE/ERO access or services, visitation format, quality/quantity of their meals or access to services or recreation. Although on-site visitation has again been halted due to spiking COVID-19 conditions, detainees were not unhappy with the current visiting arrangements and stated the remote video-visit format was preferred as their family could not afford to travel to the facility's location. All of the detainees stated they had received the ICE/ERO and facility handbooks, watched the PREA video, were informed of the SAAPI services and its reporting avenues and were aware of the OIG hotline, although none of them had reached out for its assistance. There were seven detainees interviewed during their release processing. All were granted asylum and were enroute to their support bases stateside. The other detainees interviewed all had their court date and were awaiting their set release date. There were simply no complaints of any measure brought up in these interviews.

There were no deaths, suicide attempts, escapes, hunger strikes, allegations of sexual abuse or assault or calculated uses of force reported during this inspection period.

All services are provided by Allen Parish employees. Detainee telephone and kiosk services are provided by Ally Telecom Group. Detainees are not charged co-pays for medical, mental health, or dental care services.

Areas of Concern/Significant Observations

The facility is providing the following optimal levels of service, as described in the standards in: 2.15 – Use of Force and Restraints, use of force audiovisual records are retained by the facility for at least one year after litigation or any investigation has concluded or been resolved; and 5.6 – Telephone Access, The facility has a TTY and video conferencing available for deaf/hard of hearing detainees; and 6.3 - Law Libraries and Legal Materials, detainees are provided law library access hours for more than fifteen hours per week.

This was a hybrid inspection in which some inspectors work remotely. Remote inspectors were unable to personally observe practices and procedures within the facility and relied upon photographs and/or videos to validate the observation of many standards. There were four priority components rated Does Not Meet Standard. Details are described as follows.

2.14 – Tool Control

Component 3: PRIORITY: Each facility administrator shall develop and implement a written tool control and storage system to include a tool classification system, and there are policies and procedures in place to ensure that all tools are properly marked and readily identifiable.

Finding: There is a tool control and storage system in place that includes a tool classification system. Tools are classified as either Class A (restricted) or class B (non-restricted). Inspection of kitchen utensils by on-site inspectors found that none of the kitchen utensil were marked or etched.

Recommendation: Adapt a tool classification system to ensure all tools are properly marked and readily identifiable.

3.1 – Disciplinary System



Component 5: PRIORITY: Incident reports are investigated within 24 hours of the incident by an officer who had no involvement in the incident. Low or moderate infractions are adjudicated by a Unit Disciplinary Committee (UDC). Unresolved cases and cases involving serious charges are forwarded by the UDC, or sent directly from the investigating officer, to the Institution Disciplinary Panel (IDP) for adjudication.

Finding: During the previous inspections this component was rated Does Not Meet Standard because the facility could not produce any documentation that incident reports were being investigated within 24 hours of the incident. During this inspection copies of multiple rule violation reports were reviewed. Review of these reports showed that there was still no documentation to verify that an investigative officer had been assigned, the date of the assignment or the date of the investigation was completed. Due to this lack of documentation, it was not possible to verify compliance with the requirements of this component. This is a repeat deficiency

Recommendation: Establish a procedure for the investigation of incident reports within 24 hours of the incident. Additionally, develop forms for the documentation of these investigations and the appointment of an investigating officer.

5.7 - Visitation

Component 5: PRIORITY: General visitation is permitted during set hours on Saturdays, Sundays, and holidays, and, to the extent practicable, the facility also establishes visiting hours on weekdays and during evening hours. The facility accommodates the scheduling needs of visitors for whom scheduled visiting hours pose a hardship. The number of visitors a detainee receives and the length of visits are limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order.

Finding: General visitation has been suspended during this inspection period due to COVID-19. Video visits are available to detainees using the tablets in the housing units. There is a charge for the visits. Indigent detainees do not have access to visits.

Recommendation: Provide an accommodation for a contact/non-contact and/or video-visit that is safe and does not charge a fee.

Component 9: PRIORITY: The facility's written rules shall specify time limits for visits. Visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

Finding: Normally detainees are permitted a minimum of one hour for a visit. Special consideration is given to individuals who have traveled along distance or who have unusual circumstances. On-site general visitation has been suspended during this inspection period due to COVID-19. Detainees may visit using the tablets in the housing units for a fee. No accommodation is made for indigent detainees

Recommendation: Provide an accommodation for a contact/non-contact and/or video visit that is safe and does not charge a fee.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility



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complies with the ICE Performance-Based National Detention Standards (PBNDS) 2011 for Over 72-hour facilities. No (0) standards were rated as Does Not Meet Standard and four (4) standards were Not Applicable. All remaining thirty-nine (39) standards were found to Meet Standards.

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] Lead Compliance Inspector

August 19, 2021

Printed Name of LCI

Date

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