April 18, 2019

TO: [Name]  
Assistant Director for Detention Management

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

SUBJECT: Annual Detention Inspection of the Dodge County Detention Facility

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) of the Dodge County Detention Facility in Juneau, Wisconsin during the period of April 16-18, 2019. This is an IGSA facility.

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

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td>[Name]</td>
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<tr>
<td>Security</td>
<td>[Name]</td>
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<tr>
<td>Safety</td>
<td>[Name]</td>
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<tr>
<td>Medical Care</td>
<td>[Name]</td>
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<tr>
<td>Medical</td>
<td>[Name]</td>
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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 Dodge County Detention Facility 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) - 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:
The inspection team identified twelve (12) deficient components in the following nine (9) standards:

- Correspondence and Other Mail – 1 repeat deficiency
- Detainee Grievance Procedures - 1
- Recreation – 1 repeat deficiency
- Access to Medical Care - 1
- Key and Lock Control - 2
- Population Counts – 1 repeat deficiency
- Special Management Unit (Administrative Segregation) – 1 repeat deficiency
- Special Management Unit (Disciplinary Segregation) – 2 repeat deficiencies
- Staff/Detainee Communication - 2

**Facility Snapshot/Description**

The Dodge County Detention Facility (DCDF) is located in Juneau, Wisconsin, approximately sixty miles northwest of Milwaukee. The facility is operated by the Dodge County Sheriff’s Office. The county has an Intergovernmental Service Agreement (IGSA) with ICE to house male and female detainees. A

Housing units are comprised of two direct supervision pods, two indirect supervision pods and one dormitory pod. The flexible housing options ensure that detainees are housed according to their respective classification levels. The Phase System, which works in conjunction with the ICE classification level system, is designed to provide incentives for positive behavior, as well as, program and work opportunities. The facility houses all ICE classification levels. ICE detainees are housed with other jurisdictions.

The housing units provide adequate open space. The common areas are furnished with televisions, commissary and program request kiosks, telephones, facility information binder (color-coded for ICE detainee services) and game tables. The atmosphere in the housing units was relaxed and detainees openly communicated with the inspection team. The inspection team interviewed approximately eighty detainees. Detainees stated, without exception, that they felt safe and had no concerns regarding programs and services. Facility staff were observed using the Language Line to communicate with detainees. Interviews with LEP detainees indicated that they had no issues communicating with staff and no problems obtaining services. There were no concerns expressed about medical services, law library privileges or conditions of confinement. Detainees were observed working in food services, cleaning in the pods, playing board games, playing cards, watching television, exercising in the indoor recreation area, teleconferencing in a private multipurpose room and reading. There is a law library adjacent to each housing unit.
Facility employees conducted themselves professionally during all interactions with the inspection team and with detainees. Sanitation levels were observed to be above average. Medical services are provided by WellPath. ICE detainees do not pay medical co-payments. Food services are contracted to Aramark.

**Areas of Concern/Significant Observations**

There were no areas of concerns 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 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
- Facility Staff -  

<table>
<thead>
<tr>
<th>Printed Name of LCI</th>
<th>Date</th>
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<tbody>
<tr>
<td>Lead Compliance Inspector</td>
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