



The Nakamoto Group, Inc.

April 7, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Jerome Combs Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) 2000 of the Jerome Combs Detention Center in Kankakee, Illinois during the period of April 5-7, 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
Detainee Rights	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual inspection that is performed to determine overall compliance with the ICE NDS 2000 for Over 72-hour facilities. The facility received a rating of Meets Standards during the November 2020 annual inspection.

Inspection Summary

The Jerome Combs Detention Center is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) - Yes
- 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 2020 and 2021 NDS annual inspections:



2020 Annual Inspection	
Meets Standards	38
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

2021 Annual Inspection	
Meets Standards	37
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

The inspection team identified thirteen (13) deficient components in the following six (6) standards:

- Correspondence and Other Mail – 1, which is a repeat deficiency
- Recreation – 6
- Visitation – 1
- Special Management Unit (Administrative Segregation) – 1
- Special Management Unit (Disciplinary Segregation) – 1
- Staff-Detainee Communications- 3, one of which is a repeat deficiency

Facility Snapshot/Description

The Jerome Combs Detention Center is owned by Kankakee County and is operated under the jurisdiction of the Kankakee County Sheriff's Department. It is located in downtown Kankakee, Illinois about seventy miles southwest of Chicago.

[REDACTED] The facility does not house female ICE detainees. The remaining detainees were from Kankakee County and surrounding jurisdictions of U.S. Marshals Service detainees.

[REDACTED] ICE detainees are not housed with nor do they comeingle with non-ICE detainees.

The facility was built in 2004. It is a stand-alone one-story building. The secure perimeter of the compound is comprised of the exterior walls of the building. All exterior building doors are alarmed, under constant camera surveillance, and controlled by control center staff. The compound is equipped with a 150+ surveillance camera network that is monitored 24 hours a day. Surveillance cameras offer visibility around the entire perimeter, into the housing units, the common areas, and interior movement corridors. All movement is escorted. The building perimeter is foot patrolled by an armed officer twice each shift.

The facility has sixteen individual general population housing units/pods. The housing units are a combination of dormitory styles ranging in size from twenty to 64 beds and celled units ranging in size from eight to 24 two-bed cells. There are two special management units (SMU) that combine for a total of eight one-bed cells. The health care unit has eight single bedrooms for patient care and observation; two of the rooms have negative air pressure. There were no ICE detainees in the SMU during the inspection. The facility has dedicated sections of its housing units to serve as COVID-19 wings for intake observation protocols and housing for active cases. There were eight positive COVID-19 cases on-site during this remote inspection.

Each living area, except the SMU, has a common dayroom equipped with a television, a bank of telephones, and fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. Each housing unit is furnished with a supply of electronic tablets and two kiosks on which detainees can review the facility handbook, submit in-house requests, file grievances, request sick call slips, order their commissary, send/receive emails, make telephone calls and partake in fee-based entertainment programs. Dayrooms and the tablets/kiosks are accessible daily from 8:00 a.m. to 9:00 p.m.



On-site visitation was not permitted during this inspection period, due to COVID-19 conditions. A fee-based video-visit format is the only mechanism for general and legal visits. Video visits are permitted daily, but only for twenty minutes for each call. Detainees are provided daily indoor recreation; there is no outdoor recreation at this facility.

The inspectors conducted eight confidential detainee interviews, all that volunteered for the opportunity, during the inspection; three required the use of a language line. The detainees' detention in the facility ranged from eleven days to five months. All of the detainees stated they felt safe at the facility and had not been threatened or mistreated by staff or other detainees. Detainees stated they felt informed of their behavioral expectations and were made aware of the services and programs available to them before they left the intake area. None of the detainees had filed a grievance and they were unaware of the OIG resource; they were informed by the inspectors of OIG services and how to contact them.

The detainees who registered medical concerns had their issues brought to the attention of the health services administrator by the medical SME. All concerns had been previously addressed. Emergency follow-up appointments for these individuals were not necessary; routine care for their concerns had already been scheduled.

Many of the detainees stated they did not like the food citing poor quality and small portions. These concerns were discussed with the food service manager by the safety SME. All cycle menus have been approved by a registered dietician as meeting or exceeding the nutritional requirements set by the USRDA. There is ample entrée variety in the 28-day menu. No further action was necessary. There were also numerous complaints about the absence of outdoor recreation; it is not offered at the facility.

There was some concern about the absence of ICE/ERO contact in the housing units. This issue was discussed with the supervising detention and deportation officer (SDDO) by the detainee rights SME. The stated schedule calls for an ICE/ERO presence in the facility on Wednesdays, as of February 2021. During the first ten months of this inspection period, ICE/ERO did not maintain a scheduled on-site presence, per a directive issued by the Chicago Field Office. The names of those detainees claiming they had never been seen by ICE/ERO personnel were provided to the SDDO.

Several detainees complained the housing units were not clean. This concern was discussed with the administration who assured the detainee rights SME that a faithfully executed cleaning schedule is applied to all areas of the facility. An examination of submitted photos showing the housing units and common areas does not support the detainees' allegations.

Half of the detainees complained about the lack of outdoor recreation. This concern was discussed with the SDDO by the safety SME. Those requesting transfer due to the lack of this activity will be reviewed for possible transfer.

Most of the detainees were awaiting deportation and were upset about the lack of information regarding their plight. According to ICE/ERO, definitive plans for deportation and/or asylum are frequently changing and definitive answers to their questions are not always available upon demand.

Overall, detainees were content with the climate in the facility, their treatment by staff and other detainees, and the general conditions of confinement.

Medical services are provided by MJS Advantage and county employees. Food service operations are contracted with Country Table. Building maintenance is managed by county employees. Detainee telephone, tablet, and kiosk services are provided by Securus. ICE detainees are not charged medical co-pays.



Areas of Concern/Significant Observations

The inspection was conducted remotely, and inspectors were unable to personally observe practices and procedures within the facility. The inspection team relied upon photographs and/or videos to validate the observation of many standards. 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 unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility complies with the ICE National Detention Standards (NDS) 2000 for Over 72-hour facilities. No (0) standards were rated as Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining thirty-seven (37) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and noncompliance are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. A call-in 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

April 7, 2021

Printed Name of LCI

Date

